

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit


Mr. Jack M. Kriesel
Rayonier, Inc.
Post Office Box 2002
Fernandina Beach, Florida 32035-1309

DEP File No. 0890004-006-AC
PSD-FL-256

Enclosed is the FINAL Permit Number PSD-FL-256 for the installation of a 212 Million British Thermal Units per hour boiler (Unit 8) at the Fernandina Mill, Nassau County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-212.400., F.A.C. - Prevention of Significant Deterioration(PSD).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.


C.H. Fancy, P.E., Chief
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12-17-98 to the person(s) listed:

Mr. Jack M. Kriesel, Rayonier *
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS
Mr. Chris Kirts, DEP

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

12-17-98
(Date)

FINAL DETERMINATION

Rayonier, Incorporated

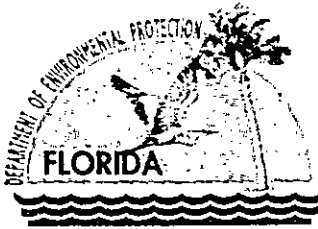
Permit No. 0890004-006-AC, PSD-FL-256

Fernandina Mill

An Intent to Issue an air construction permit to Rayonier, Inc., to install a temporary fuel oil boiler at Fernandina Mill in Nassau County, was distributed on November 9, 1998. The Notice of Intent was published in the News-Leader on November 11, 1998. Copies of the draft construction permit were available for public inspection at the Department offices in Jacksonville and Tallahassee.

No comments were submitted by the National Park Service, the U.S. Environmental Protection Agency or the public. No comments were received from the applicant other than inquiries regarding the earliest possible issue date of the final permit. The Department will delete Condition No. 3 of Section II. Emission Unit(s) Administrative Requirements. This condition is not required as the facility does not have Emission Unit(s) Common Specific Conditions attached to the permit.

The final action of the Department is to issue the permit with the change noted above.



Lawton Chiles
Governor

Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

PERMITTEE:

Rayonier, Inc.
Post Office Box 2002
Fernandina Beach, Florida 32035-1309

Authorized Representative:

Jack M. Kriesel
General Manager

FID No.	0890004
PSD No.	PSD-FL-256
SIC No.	2611
Project:	Temporary Boiler
Permit No.	0890004-006-AC
Expires:	January 31, 2000

PROJECT AND LOCATION:

Permit for the construction of a 212 MMBtu/hr Combustion Engineering boiler at the Fernandina Mill, Foot of Gum Street, Fernandina Beach, Nassau County. UTM coordinates are Zone 17; 454.7 km E; 3392.2 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices are made a part of this permit:

Appendix BD BACT Determination
Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

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

AIR CONSTRUCTION PERMIT 0890004-006-AC AND PSD-FL-256

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The Fernandina Mill presently consists of three power boilers designated as Units 1, 2 and 3, and one recovery boiler designated as Unit 6. This permit is to construct a 212 MMBtu/hr temporary boiler designated as Unit 8 and will be used to replace Units 1 & 2 while they undergo foundation repairs.

REGULATORY CLASSIFICATION

The Fernandina Mill is classified as a Major Source of Air Pollution or Title V Source because it emits or has the potential to emit at least 100 tons per year of a regulated air pollutant. It is also a Major Facility with respect to preconstruction review because it emits or has the potential to emit at least 250 tons per year of a regulated air pollutant.

PERMIT SCHEDULE:

- 08-07-98: Date of Receipt of Application
- 10-26-98: Application deemed complete
- 11-09-98: Intent issued
- 11-11-98: Notice of Intent published in News-Leader

RELEVANT DOCUMENTS:

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 08-07-98
- Department's letter dated 09-01-98, 09-03-98, and 10-19-98
- Company letters dated 10-06-98, and 10-26-98
- Technical Evaluation and Preliminary Determination dated 11-09-98
- Best Available Control Technology determination (issued concurrently with permit)

AIR CONSTRUCTION PERMIT 0890004-006-AC AND PSD-FL-256

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, Northeast District Office located at 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256, and phone number (904) 448-4300. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blirstone Road, Tallahassee, Florida 32399-2400 and phone number (850) 488-0114.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [**Rule 62-4.160, F.A.C.**]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [**Rule 62-210.900, F.A.C.**]
5. Expiration: This air construction permit shall expire on January 31, 2000. [**Rule 62-210.300(1), F.A.C.**]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the permitting authority office of any delays in completion of the project which would affect the startup day by more than 90 days. [**Rule 62-4.090, F.A.C.**]
6. Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [**Rule 62-210.300, F.A.C.**]

AIR CONSTRUCTION PERMIT 0890004-006-AC AND PSD-FL-256

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

LISTING OF EMISSIONS UNITS

This permit addresses the following emission units.

EMISSION UNIT NO.	EMISSIONS UNITS DESCRIPTION
001	Existing No. 1 Power Boiler, oil fired boiler
002	Existing No. 2 Power Boiler, oil and wood waste fired boiler
008	New 212 MMBtu/hr Temporary Boiler, oil fired boiler

SPECIFIC CONDITIONS (UNIT 008):

The following Specific Conditions apply to the following emission unit:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
008	212 MMBtu/hr Temporary Boiler, oil fired boiler

EMISSION LIMITATIONS

1. The maximum allowable emission rates for NO_x for Unit No. 008 shall not exceed 0.425 pounds per million Btu (lb/mmBtu) or 90 pounds per hour (lb/hr) and 395 tons per year (TPY) pursuant to the Best Available Control Technology (BACT) Determination. [Rule 62-212.410, F.A.C.]
2. The maximum allowable emission rates for SO₂ for Unit No. 008 shall not exceed 0.26 lb/mmBtu or 55 lb/hr and 244 TPY. [Per application]
3. The maximum allowable emission rates for PM/PM₁₀ for Unit No. 008 shall not exceed 0.05 lb/mmBtu or 5 lb/hr and 21 TPY. [Per application]
4. Visible emissions shall not exceed 20 percent opacity except for either one six-minute period per hour during which opacity shall not exceed 27 percent, or one two-minute period per hour during which opacity shall not exceed 40 percent. [Rule 62-296.406(1), F.A.C.]
5. In order to minimize excess emissions during startup/shutdown/malfunction this emission unit shall adhere to best operational practices. [Rule 62-210.700, F.A.C.]

OPERATIONAL LIMITATIONS

6. The emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].
7. Only No. 6 fuel oil may be fired in the boiler. The maximum sulfur content of the No. 6 fuel oil shall not exceed 2.5 percent, by weight. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].
8. The maximum heat input rate to Unit No. 008 shall not exceed 212 MMBtu/hr [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].

AIR CONSTRUCTION PERMIT 0890004-006-AC AND PSD-FL-256

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

9. The maximum No. 6 fuel oil consumption allowed to be burned in Unit No. 008 is 12,400,000 gallons per year, which is equivalent to 8760 hours per year of operation at full load. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit]
10. Unit No. 008 can be operated for one year (12 months) from the start-up date. The facility will notify Bureau of Air Regulation and the Northeast District of the start-up date for the emission unit. Quarterly progress reports shall be submitted to the Northeast District concerning the project. Any deviations from the project schedule as outlined in the PSD application shall be approved by the Bureau of Air Regulation. [Per application]
11. Unit No. 008 can be operated only when either Unit No. 001 or Unit No. 002 is down for foundation repairs. [Per application]

TEST METHODS AND PROCEDURES

12. Compliance with the allowable emission limiting standards for NO_x in Specific Condition 1 shall be determined by using EPA Reference Method 7E (or equivalent) as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.310, F.A.C.]
13. Compliance with the allowable emission limiting standards for SO₂ in Specific Condition 2 shall be determined by using EPA Reference Method 6C (or equivalent) as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.310, F.A.C.]
14. Compliance with the allowable emission limiting standards for PM/PM₁₀ in Specific Condition 3 shall be determined by using EPA Reference Method 5 (or equivalent) as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.310, F.A.C.]
15. The fuel shall be monitored initially and annually for the sulfur content using ASTM D4294 Method (or equivalent). [Rule 62-297.440, F.A.C.]
16. The permittee shall maintain daily records of fuel oil consumption for the emission unit. [Rule 62-210.200, F.A.C.]
17. Compliance with the visible emission standard shall be demonstrated with EPA Reference Method 9 as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.401, F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

18. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]
19. Two copies of the results of the emission tests for the pollutant listed in Specific Conditions 1, 2 and 3 for Unit No. 8 shall be submitted within forty-five days of the last sampling run to the Northeast

AIR CONSTRUCTION PERMIT 0890004-006-AC AND PSD-FL-256

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

District office in Jacksonville. All reports shall be in a format consistent with and shall include the information in accordance with Rule 62-297.310 (8), F.A.C. [**Rule 62-297.310(8), F.A.C.**]

SPECIFIC CONDITIONS (UNIT 001-002)

The following Specific Conditions apply to the following emission units:

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
001	No. 1 Power Boiler, oil fired boiler
002	No. 2 Power Boiler, oil and wood waste fired boiler

- 20. Emission Units No. 001 and 002 shall comply with all the requirements and emission limitations of Title V Air Operation Permit No. 0890004-005-AV. [**Air Operation Permit 0890004-005-AV**]
- 21. In order to minimize excess emissions during startup/shutdown/malfunction emission units No. 001 and 002 shall adhere to best operational practices. [**Rule 62-210.700, F.A.C.**]

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Fernandina Mill
Rayonier, Incorporated
PSD-FL-256 and 0890004-006-AC
Fernandina Beach, Nassau County

Rayonier plans to install a leased package #6 fuel oil boiler at its existing Fernandina Mill in Fernandina Beach, Nassau County. The unit is a Combustion Engineering 37-A-15 Type A Boiler. The boiler will temporarily be used to supply steam to replace either No. 1 or No. 2 power boiler while that boiler undergoes foundation repair. The facility currently consists of three (3) power boilers and a recovery boiler used for generating steam. Power Boiler No. 1 burns #6 fuel oil with a 2.5% sulfur content and has a heat input capacity of 185 MMBtu/hr. Power Boiler No. 2 primarily fires wood waste and also #6 fuel oil with 2.5% sulfur content when required. The heat input capacity for boiler No. 2 varies depending on the fuel fired and can vary from 185 MMBtu/hr on #6 oil to 218 MMBtu/hr on wood fuels. The proposed temporary unit will have a heat input capacity of 212 MMBtu/hr and will burn #6 fuel oil with a 2.5% sulfur content by weight. There is a single #6 fuel oil storage and supply system at the facility that supplies fuel to Boiler Nos 1 and 2 and supplies fuel as needed to other combustion units.

Rayonier has indicated that the maximum annual air pollutant emission rates in tons per year for the 212 MMBtu/hr temporary boiler, based on an annual consumption of 12.4 million gallons of No. 6 fuel oil and 100% capacity factor or 8760 hours of operation will be:

Pollutant	#1 boiler actual emissions (TPY)	#2 boiler actual emissions (TPY)	Temporary boiler potential emissions (TPY)	Delta emissions with temp. on & #1 off (TPY)	Delta emissions with temp. on & #2 off (TPY)	Delta emissions with repair of 8 mos. to # 2 & 4 mos. to #1 (TPY)	Subject to PSD Review
PM & PM ₁₀	111	159	21	-90	-138	-122	No
SO ₂	467	81	244	-223	162	34	No
CO	16	376	31	15	-345	-225	No
NO _x	227	58	395	167	336	280	Yes
VOC	1	10	7	6	-3	0	No

BACT DETERMINATION REQUESTED BY THE APPLICANT:

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides	0.425 lb/mmBtu by flue gas recirculation and low NO _x burners

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The Fernandina Mill is a major source of air pollution or Title V source. Because emissions of a pollutant are greater than 250 tons per year, it is a major facility with respect to the Prevention of Significant Deterioration (Rule 62-212.400). Because the project will result in a significant increase in nitrogen oxides emissions per Table 62-212.400-2, F.A.C., "Regulated Air Pollutants - Significant Emissions Rates," a BACT determination is required pursuant to Rule 62-212.410, F.A.C.

DATE OF RECEIPT OF A BACT APPLICATION:

October 6, 1998

REVIEW GROUP MEMBERS:

Syed Arif, P.E., prepared BACT

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as follows:

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

- *Combustion Products* (e.g., SO_2 , NO_x , PM). Controlled generally by good combustion of clean fuels, removal in add-on control equipment.
- *Products of Incomplete Combustion* (e.g., CO, VOC). Control is largely achieved by proper combustion techniques.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO_2 , H_2SO_4 , fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT POLLUTANT ANALYSIS

NITROGEN OXIDES (NO_x)

Oxides of nitrogen (NO_x) are generated during fuel combustion by oxidation of chemically bound nitrogen in the fuel (fuel NO_x) and by thermal fixation of nitrogen in the combustion air (thermal NO_x). As flame temperature increases, the amount of thermally generated NO_x increases. Fuel type affects the quantity and type of NO_x generated. Generally, natural gas is low in nitrogen. However it causes higher flame temperatures and generates more thermal NO_x than oil or coal, which have higher fuel nitrogen content, but exhibit lower flame temperatures.

NO_x emissions represent a significant portion of the total emissions generated by this project, and must be minimized using BACT. A review of EPA BACT/LAER Clearinghouse (BACT Clearinghouse) information indicates that NO_x emissions at most small facilities are minimized by process control and good combustion practices.

The applicant has proposed combustion controls equipped on the temporary boiler which includes flue gas recirculation (FGR) and low NO_x burners. The combination of FGR and low NO_x burners results in less NO_x formation. Low NO_x burners reduce NO_x by conducting the combustion process in stages. Staging partially delays the combustion process, resulting in a cooler flame which suppresses thermal NO_x formation. NO_x reductions of 40 to 85 percent (relative to uncontrolled emission levels) have been observed with low NO_x burners when combined with flue gas recirculation.

In a FGR system, a portion of the flue gas is recycled from the stack to the burner windbox. Upon entering the windbox, the cooler gas is mixed with combustion air prior to being fed to the burner. The FGR system reduces NO_x emissions by two mechanisms. In the first mechanism, the recycled flue gas is made up of combustion products which acts as inserts during combustion of the fuel/air mixture. This additional mass is heated in the combustion zone, thereby lowering the peak flame temperature and reducing the amount of NO_x formed. Second, to a lesser extent, FGR also reduces NO_x formation by lowering the oxygen concentration in the primary flame

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

zone. This combination of NO_x controls and good combustion practices should provide effective emissions control.

BACT DETERMINATION BY DEP:

Based on the information provided by the applicant and the information searches conducted by the Department, lower emissions limits can be obtained employing the top-down BACT approach for NO_x.

NO_x DETERMINATION

The top-down BACT approach for fuel oil boilers listed in order from most stringent control to least:

1. Selective Catalytic Reduction (SCR)
2. Selective Noncatalytic Reduction (SNCR)
3. Good combustion design/practices

The following table summarizes the feasibility of using these control technologies with the Combustion Engineering Boiler as designed for installation in Rayonier's Fernandina Mill.

Control Technology	Emission Reduction (%)	Technically Feasible	Cost per ton	Adverse Environ. Impacts
SCR with ammonia	80-90	Yes	\$6,970	Yes
SNCR	40-70	Yes	\$8,750	No
Low NO _x Burners with Flue Gas Recirculation	20-50	Yes	N/A	No
Fuel Substitution	7-35	Yes	\$21,000	No

The BACT/LAER database does not list any facilities which uses post-combustion add-on controls for temporary boiler installations. Because the boiler is temporary (12 months), the economic impact analysis of add-on type controls were based on a one year equipment life amortization versus a typical 10 year life. The one year time frame results in a very high economic impact.

For NO_x emissions, the Department accepts the applicants proposed use of low NO_x burners with flue gas recirculation as BACT for this project.

The BACT emission level established by the Department is as follows:

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides (NO _x)	0.425 lb/mmBtu; 90 lbs/hr (395 TPY)

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

COMPLIANCE


Compliance with the NO_x limitations shall be in accordance with the EPA Reference Method 7E as contained in 40 CFR 60, Appendix A.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

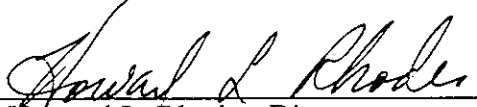
Syed Arif, P.E.
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:



C. H. Fancy, P.E., Chief
Bureau of Air Regulation



Howard L. Rhodes, Director
Division of Air Resources Management

12/15/98
Date:

12/15/98
Date:

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]



The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

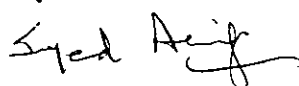
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X)
 - (b) Determination of Prevention of Significant Deterioration (X); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy 
Al Linero 

FROM: Syed Arif 

DATE: December 15, 1998

SUBJECT: Rayonier, Inc., 0890004-006-AC,
PSD-FL-256

Attached for approval and signature is a construction permit number 0890004-006-AC, PSD-FL-256 for Rayonier, Inc., Fernandina Mill's 212 MMBtu/hr temporary boiler (Unit No. 8) to be located in Fernandina Beach, Florida. A Technical Evaluation and Preliminary Determination was issued, and the facility was required to do a public notice.

The new unit is a source of nitrogen oxides emissions which are controlled by flue gas recirculation and low NO_x burners. The temporary boiler will be utilized for a period of 12 months while the No. 1 and No. 2 Power boilers undergo foundation repairs. The existing scrubber systems will be used to minimize other pollutant emissions.

The project modification provides reasonable assurance that all the requirements of the permit and BACT determination will be complied with. I recommend your approval and signature.

SENDER:

- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Jack Kriesel
 Rayonier, Inc.
 PO Box 2002
 Fernandina Beach, FL
 32035-1309

4a. Article Number
 2 333 612 569

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

7. Date of Delivery
 12-22-98

5. Received By: (Print Name)
 C. MITCHELL

6. Signature: (Addressee or Agent)
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

2 333 612 569

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
Post Office, State, & ZIP Code	Fernandina Beach, FL
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	12-17-98

PS Form 3800, April 1995
 08910004-006-AC
 PSD-FI-256