Rayonier

Specialty Pulp Products

Fernandina Mill

RECEIVED
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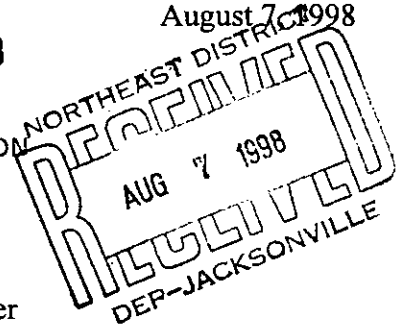
BUREAU OF
AIR REGULATION

August 7, 1998



Mr. Christopher L. Kirts, P. E.
Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

RE: Construction Permit for Temporary Replacement Boiler

Dear Mr. Kirts:

Repairs must be made on an emergency basis to both no. 1 and no. 2 power boilers at Rayonier's dissolving sulfite mill in Fernandina Beach. These boilers will be taken off line sequentially and repaired. This repair is scheduled to take one year. The mill intends to lease a boiler capable of producing 150,000 pounds of 600 psi steam and to connect it to the existing scrubbers and stacks serving nos. 1 and 2 power boilers. This temporary boiler will burn only number 6 fuel oil. At the end of the repair the leased boiler will be returned to the lender. A boiler of this size will enable full operation of the mill.

The mill is expecting delivery of this temporary boiler in December 1998 with operations beginning in February 1999. It will be located west of and near the existing nos. 1, 2 and 3 power boilers on an old foundation for the abandoned no. 4 power boiler. This will locate it near the existing scrubbers and stacks so that it can be tied into the ductwork leading to A scrubber currently serving nos. 1 and 2 power boilers and will exhaust out the stack associated with that scrubber.

Attached to this letter I have estimated both present actual emissions of nos. 1 and 2 power boilers and the expected emissions of the temporary boiler. Future emissions are dependent on the operating scenario being used. Only two operating scenarios are contemplated in this application. Either no. 1 boiler is off-line being repaired and is replaced by the temporary boiler or no. 2 boiler is off-line being repaired and is replaced by the temporary boiler. The Summary Table of Emissions below indicates the increases and decreases for each scenario and the actual annual increase or decrease expected given the time the temporary boiler substitutes for each boiler being repaired.

Pursuant to my conversations with Rita Felton-Smith, I have enclosed an application for a construction permit for the temporary boiler. Two issues are raised by this application that require further explanation.

I understand that this boiler will be required to meet any applicable New Source Performance Standards (NSPS). I also understand that increases of applicable pollutants over the significant levels will trigger a Prevention of Significant Deterioration review. These two regulatory requirements are discussed further below.

1. NSPS ISSUES. The temporary boiler will have a maximum heat input rate 212.47 Million Btu per hour (mmBtu/hr). It was constructed in 1974, before the New Source Performance Standards (Subpart Db) were promulgated or for similar new sources. However, the boiler will meet all the New Source Performance Standards that a modern boiler would be required to meet except for the NOx standards proposed on July 9, 1997 in 62 FR 36948. In any event, because of its construction date no NSPS's apply to this boiler.

Section 40 CFR 60.42b NSPS would require a 90% reduction of potential sulfur dioxide emissions for those boilers subject to it. Rayonier estimates its present sulfur dioxide removal efficiency in the venturi scrubber to be approximately 80%.

2. PSD ISSUES. As stated above, the leased boiler was constructed in 1974. This was before the promulgation of the PSD Program. Sources constructed prior to August 7, 1977 are not subject to PSD review. See Section 40 CFR 52.21(i)(4).

However, in order to show what effect the temporary installation will have, the actual increases and decreases have been estimated to determine whether the PSD significance levels would be exceeded. The table below provides a summary of that analysis. The emissions for no. 1 and 2 boilers were taken from the Annual Operating Report for 1997. The basis for the emission estimation calculations for the temporary boiler are also attached. Since repair to no. 1 boiler is only expected to take 4 months, and the repair to no. 2 boiler is to take 8 months, the actual increases or decreases have been proportioned between the two scenarios. Only for nitrogen dioxide are the significance levels exceeded, and then only by 40 tons per year.

The NO_x emissions from the newer oil fired boiler are approximately the same as those from the existing oil fired boiler, but are greater than for the wood fired no. 2 boiler possibly because of the lower thermal NOx generated. NO_x emissions will increase while no. 2 boiler is being repaired and the temporary boiler is on-line. However, in order to minimize any increase, Rayonier will install low excess air boiler controls and low NOx burners. Even if this boiler were subject to PSD review, and BACT were required, it is unlikely that controls on a temporary source in addition to the low excess air and low NOx burners would be required.

The table below summarizes the various existing and projected emissions changes for the two scenarios.

SUMMARY OF EMISSIONS AND INCREASES/DECREASES

Pollutant	#1 boiler actual emissions 97 AOR	#2 boiler actual emissions 97 AOR	Temp boiler Potential emissions AP42	Delta emissions With temp on and #1 off	Delta emissions with temp on and #2 off	Delta emissions with repair of 8 mos. to No 2 and 4 mos. No. 1
PM10	111	159	151.48	41	-7	9
SO2	467	81	487	20	406	277
CO	16	376	31	15	-345	-225
NOx	172	48	171	-1	122	81
VOC	1	10	7	6	-3	0

These repairs must be made to the foundations of nos. 1 and 2 boilers immediately. Even though the temporary boiler is exempt from NSPS and PSD, Rayonier has made every reasonable effort to comply with those requirements. The existing level of sulfur dioxide removal will be continued by using the existing scrubbers. Low NOx burners and whatever low excess air control that can be placed on a boiler of this age will be used to reduce NOx emissions. It is requested that a permit be issued immediately so that these repairs can be made without significant loss of production.

If you have any questions, please call me at 904-277-1452.

Sincerely,

David E. Tudor
Manager, Environmental
Affairs – Air

Cc: Rita Felton-Smith

Enc.

tempblrltr

Attachment to Letter for Fernandina Temporary Boiler Permit
Christopher Kirts
August 7, 1998

FERNANDINA TEMPORARY BOILER EMISSIONS ANALYSIS

#1 power boiler - 6255 x 10^3 gal/yr. #6 oil

#2 power boiler – 977 x 10^3 gal/yr. #6 oil and 113,233 ton/yr. wood waste/yr.

Take emissions from 1997 Annual Operating Report

Temp boiler

150,000 lbs. steam x 1204 Btu/lbs. / 0.85 fuel efficiency = 212.47 mmBtu/hr
212.47 mmBtu/hr / 0.150000 mmBtu/gal = 1416.46 gal/hr
1.416.46 tgal./hr. x 8760 hr./yr. = 12,408 tgal/yr.

PM - Using AP42 and venturi scrubber control efficiency of 87%
8.34 x (9.19 x 2.5 + 3.22) x 12,408) x (1/2000 ton/lbs.) x (1.0 - 0.87)
= 176.2 ton/yr.
allowed:
0.1 lbs./mmBtu x 212.47 mmBtu/hr x 8760/2000 = 93.06 tons/yr

PM10 - Using AP42 and venturi scrubber control efficiency of 87%
7.17 x (9.19 x 2.5 + 3.22) x 12,408 x (1/2000 ton/lbs.) x (1.0 - 0.87)
= 151.48 tons/yr

SO_2 - Using AP42 and venturi scrubber control efficiency of 80%
157 x 2.5 % fuel sulfur x 12,408 tgal/yr. x (1/2000 ton/lbs.) x (1-0.8 scrubber eff)
= 487.01 tons/yr.

CO - Using AP42
5 lbs./tgal x 12,408 tgal/yr x (1/2000 ton/lbs.) = 31.02 tons/yr.

NO_x - Using AP42 and low excess air and low NO_x burners for a 50% reduction
55lb/tgal x 12,408 tgal/yr x (1/2000 ton/lbs.) x 0.5 = 170.61 tons/yr.

proposed NSPS:
0.2 lbs/mmBtu x 212.47 mmBtu/hr x 8760/2000 = 186.12 tons/yr.

VOC - Using AP42
1.13 lbs./tgal x 12,408 tgal/yr. (1/2000 ton/lbs.) = 7.01 tons/yr.

tempblrltr

FLORIDA DEP LOGO

Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: **Rayonier, Inc.**	
2. Site Name: **Fernandina Mill**	
3. Facility Identification Number: **31JAX450004** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **Foot of Gum Street** City: **Fernandina Beach** County: **Nassau** Zip Code: **32035-1309**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
Jack M. Kriesel, General Manager, Rayonier, Inc.

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: **Rayonier, Inc.**
Street Address: **Foot of Gum Street**
City: **Fernandina Beach** State: **FL** Zip Code: **32035-1309**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
Telephone: (**904**) **261-3611** Fax: (**904**) **277-1413**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Jack M Kriesel
Signature

8/7/98
Date

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit	Permit Type
TB1	Temporary package #6 oil boiler	AC1B

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[ ] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

[X] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

_____

[ ] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

[X] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: _____

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[ ] Attached - Amount: $_____ [X] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations: **A temporary #6 fuel oil fired boiler will be leased and installed to provide steam while either power boiler no. 1 or no. 2 are off line and undergo foundation repairs. Repairs are expected to take 12 months, 4 months for no. 1 boiler and 8 months for no. 2 boiler. This temporary boiler will be removed from the site when repairs to nos. 1 and 2 boilers are completed.**
2. Projected or Actual Date of Commencement of Construction: **December 1998**
3. Projected Date of Completion of Construction:

Professional Engineer Certification

1. Professional Engineer Name: **Michael G. Ryan** Registration Number: **52090**
2. Professional Engineer Mailing Address: Organization/Firm: **EMCON** Street Address: **8021 Phillips Highway, Suite 12** City: **Jacksonville** State: **FL** Zip Code: **32256**
3. Professional Engineer Telephone Numbers: Telephone: **(904) 636-9360** Fax: **(904) 636-9356**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

8/7/98

Signature Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact:
David E. Tudor
Manager Environmental Affairs – Air

2. Application Contact Mailing Address:

Organization/Firm: **Rayonier, Inc.**
Street Address: **P. O. Box 2002**
City: **Fernandina Beach** State: **FL** Zip Code: **32035-1309**

3. Application Contact Telephone Numbers:
Telephone: (**904**) **277-1452** Fax: (**904**) **277-1413**

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **454.7** North (km): **3392.2**			
2. Facility Latitude/Longitude: **NA** Latitude (DD/MM/SS): Longitude (DD/MM/SS):			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **26**	6. Facility SIC(s): **2611**
7. Facility Comment (limit to 500 characters): **This facility extracts cellulose from fibrous sources using processes similar to the sulfite pulping process. It produces what is referred to as dissolving pulps.**			

Facility Contact

1. Name and Title of Facility Contact: **Richard Hopper, Manager Environmental Operations**
2. Facility Contact Mailing Address: Organization/Firm: **Rayonier, Inc.** Street Address: **P. O. Box 2002** City: **Fernandina Beach** State: **FL** Zip Code: **32035-1309**
3. Facility Contact Telephone Numbers: Telephone: (**904**) **277-1480** Fax: (**904**) **261-0333**

Facility Regulatory Classifications

1. Small Business Stationary Source? [ ] Yes [X] No [ ] Unknown
2. Title V Source? [X] Yes [ ] No
3. Synthetic Non-Title V Source? [ ] Yes [X] No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? [X] Yes [ ] No
5. Synthetic Minor Source of Pollutants Other than HAPs? [ ] Yes [X] No
6. Major Source of Hazardous Air Pollutants (HAPs)? [X] Yes [ ] No
7. Synthetic Minor Source of HAPs? [ ] Yes [X] No
8. One or More Emissions Units Subject to NSPS? [ ] Yes [X] No
9. One or More Emission Units Subject to NESHAP? [ ] Yes [X] No
10. Title V Source by EPA Designation? [ ] Yes [X] No
11. Facility Regulatory Classifications Comment (limit to 200 characters):

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

The Rule Applicability Analysis is not required for the facility. This is a Category III application, but involving a Title V source. A Rule Applicability Analysis for the temporary boiler is presented in Section III of the application.

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

See Attachment 1 for a list	

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
See Attachment 2 for a list	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted: **NA**		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters): **This section is not applicable. No cap is requested.**		

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: [X] Attached, Document ID: 3 [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: 4 [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [ ] Attached, Document ID:_____ [X] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: [ ] Attached, Document ID:_____ [X] Not Applicable
8. List of Equipment/Activities Regulated under Title VI: [ ] Attached, Document ID:_____ [ ] Equipment/Activities On site but Not Required to be Individually Listed [X] Not Applicable
9. Alternative Methods of Operation: [X] Attached, Document ID: 5 [ ] Not Applicable
10. Alternative Modes of Operation (Emissions Trading): [ ] Attached, Document ID: _____ [ ] Not Applicable

11. Identification of Additional Applicable Requirements: [ ] Attached, Document ID:_____ [X] Not Applicable
12. Compliance Assurance Monitoring Plan: [ ] Attached, Document ID:_____ [X] Not Applicable
13. Risk Management Plan Verification: [ ] Plan Submitted to Implementing Agency - Verification Attached, Document ID:_____ [X] Plan to be Submitted to Implementing Agency by Required Date [ ] Not Applicable
14. Compliance Report and Plan: [ ] Attached, Document ID:_____ [X] Not Applicable
15. Compliance Certification (Hard-copy Required): [ ] Attached, Document ID:_____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): **Type 1 - Temporary #6 fuel oil fired boiler to replace either no.1 or no. 2 boiler while the other is being repaired. Duration on-site is expected to be 1 year.**		
2. Emissions Unit Identification Number: [ ] No Corresponding ID [X] Unknown		
3. Emissions Unit Status Code: **C**	4. Acid Rain Unit? [ ] Yes [X] No	5. Emissions Unit Major Group SIC Code: **26**
6. Emissions Unit Comment (limit to 500 characters): **This is a construction permit application but issuance of the construction permit should include this emissions unit on the facility's Title V operating permit.**		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): **Venturi scrubber**
2. Control Device or Method Code: **053**

B.

1. Description (limit to 200 characters): **Low Excess Air Control** **Low NOX Burners**
2. Control Device or Method Code: **029**

C.

1. Description (limit to 200 characters):
2. Control Device or Method Code:

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

This application is for a construction permit for a leased #6 fuel oil fired boiler that will temporarily be used to supply steam while another boiler is being repaired. It will be used for approximately one year. The specific boiler being permitted was constructed in 1974 and therefore is not subject to NSPS subpart Db as that rule was not promulgated until 1985. This boiler is not subject to PSD also because of it construction date. The PSD rules apply to sources constructed after August 7, 1977. See 40 CFR 52.21(i)(4). Below is the analysis by 62-212.FAC citations.

62-212.300 FAC – General Preconstruction Review Requirements - This section requires application for a construction permit demonstrating compliance with other regulations. This application for a construction permit constitutes compliance with this section and so demonstrates. Because emission increases are negative or small and the stack gas parameters are very similar and because the same scrubber and stack are being used, no changes from previously submitted ambient modeling are expected.

62-212.400 FAC – Prevention of Significant Deterioration - Due to the age of this source, it is exempt from this permit review. See above.

62-212.500 FAC – Preconstruction Review for Nonattainment Areas - There are no Nonattainment areas involved.

62-212.600 FAC – Sulfur Storage and Handling Facilities - This facility has a molten sulfur storage facility included on its Title V permit. This application does not include any sulfur storage or handling facility.

62-212.710 FAC – Air Emission Bubble - There is no bubble involved with this application.

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

Rayonier Core List of Rules applying to entire facility. See Attachment 1.	
62-296.410(2)(b) FAC	
62-297.310 FAC	
62-297.401(1) FAC	
62-297.401(2) FAC	
62-297.401(3) FAC	
62-297.401(4) FAC	
62-297.401(5) FAC	
62-297.401(6) FAC	
62-297.401(7) FAC	
62-297.401(9) FAC	
62-297.401(10) FAC	

E. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **TB1 Stack A**
2. Emission Point Type Code: [ ] 1 [**X**] 2 [ ] 3 [ ] 4
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **All boilers can vent to either scrubber or stack. Generally boilers nos. 1 and 2 and this temporary boiler vents to stack scrubber A and stack A and boiler no. 3 vents to scrubber B and stack B.**
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **B1 - no. 1 power boiler** **B2 - no. 2 power boiler** **B3 - no. 3 power boiler** **TB1 – temporary power boiler**
5. Discharge Type Code: [ ] D [ ] F [ ] H [ ] P [ ] R [**X**] V [ ] W
6. Stack Height: **180** feet
7. Exit Diameter: **10.0** feet
8. Exit Temperature: **136** °F

9. Actual Volumetric Flow Rate:	**UNK** acfm
10. Percent Water Vapor :	**UNK** %
11. Maximum Dry Standard Flow Rate:	**UNK** dscfm
12. Nonstack Emission Point Height: **NA**	feet
13. Emission Point UTM Coordinates: Zone: **17** East (km): **454.7** North (km): **3392.2**	
14. Emission Point Comment (limit to 200 characters):	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment __1__ of __1__

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **#6 fuel oil fired in boiler (emissions related to thousands of gallons burned)**	
2. Source Classification Code (SCC): **1-02-004-01**	
3. SCC Units: **thousands gallons burned**	
4. Maximum Hourly Rate: **1.42**	5. Maximum Annual Rate: **12,408**
6. Estimated Annual Activity Factor: **NA**	
7. Maximum Percent Sulfur: **2.5**	8. Maximum Percent Ash: **0.03**
9. Million Btu per SCC Unit: **150**	
10. Segment Comment (limit to 200 characters):	

Emissions Unit Information Section __1___ of ___1__

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):	
2. Source Classification Code (SCC):	
3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	**053**	**NA**	**EL**
SO2	**052**	**NA**	**EL**
CO	**NA**	**NA**	**NA**
NOx	**NA**	**NA**	**NA**
VOC	**NA**	**NA**	**NA**

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: **PM**

2. Total Percent Efficiency of Control: **87** %

3. Potential Emissions: **40.2** lb/hour **176.2** tons/year

4. Synthetically Limited?
   [ ] Yes [**X**] No

5. Range of Estimated Fugitive/Other Emissions: **NA**
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor: **8.34 x ((9.19 x S%) +3.22) x tgal/yr**
   Reference: **AP42**

7. Emissions Method Code:
   [ ] 0 [**X**] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):

8.34 x ((9.19 x 2.5%) +3.22) x 12,408 tgal/yr x (1/2000 ton/lbs) x 0.13
= 176.2 ton/year

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **Rule**	
2. Future Effective Date of Allowable Emissions: **NA**	
3. Requested Allowable Emissions and Units: **0.1 lbs/mmBtu**	
4. Equivalent Allowable Emissions:	**21.2** lb/hour **93** tons/year
5. Method of Compliance (limit to 60 characters): **Quarterly Stack Test EPA Method 5**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **0.1 lbs/mmBtu x 212.47 mmBtu/hr x 8760/2000 = 93 tons/yr**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions:	lb/hr tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: **SO2**

2. Total Percent Efficiency of Control: %

3. Potential Emissions: **556** lb/hour **2435** tons/year

4. Synthetically Limited?
   [ ] Yes [**X**] No

5. Range of Estimated Fugitive/Other Emissions: **NA**
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor: **157 x S% x tgal/yr**
   Reference: **AP42**

7. Emissions Method Code:
   [ ] 0 [**X**] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
157 x 2.5% x 12,408 tgal/yr x (1/2000 ton/lbs) x = 2435 ton/year

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):

Emissions Unit Information Section __1___ of ___1__

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **Rule**
2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **2.5% sulfur in fuel oil**
4. Equivalent Allowable Emissions: **587.83** lb/hour **2574.71** tons/year
5. Method of Compliance (limit to 60 characters): **fuel analysis and fuel usage measurements**
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **212.47 mmBtu/hr x 8.3 lb/gal x 8760 hr/yr x 0.025 %S x 2 SO2/S = 2574.71** **150,000 Btu/gal x 2000 lb/ton**

B.

1. Basis for Allowable Emissions Code:
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:
4. Equivalent Allowable Emissions: lb/hr tons/year
5. Method of Compliance (limit to 60 characters):
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation __1___ of __1___

1. Visible Emissions Subtype: **VE30**
2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **30** % Exceptional Conditions: **40** % Maximum Period of Excess Opacity Allowed: **2** min/hour
4. Method of Compliance: **EPA Method 9**
5. Visible Emissions Comment (limit to 200 characters): **Wet scrubber on stack.** **Rule basis for allowable opacity is FAC 62-296.410(2)(b)(1)**

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters): **This section is NA. No continuous emission monitors are required for this temporary source.**	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [X] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[X] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[X] Unknown
SO2	[ ] C	[ ] E	[X] Unknown
NO2	[ ] C	[ ] E	[X] Unknown

4. Baseline Emissions: **NA**		
PM	lb/hour	tons/year
SO2	lb/hour	tons/year
NO2		tons/year

5. PSD Comment (limit to 200 characters):

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram [**X**] Attached, Document ID:__**6**_____ [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [**X**] Attached, Document ID:__**7**____ [ ] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [**X**] Attached, Document ID:__**8**____ [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [**X**] Attached, Document ID:__**9**_____ [ ] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [**X**] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [**X**] Not Applicable
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID:_____ [**X**] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [**X**] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation [X] Attached, Document ID:___5___ [ ] Not Applicable
11. Alternative Modes of Operation (Emissions Trading) [ ] Attached, Document ID:_____ [ ] Not Applicable
12. Identification of Additional Applicable Requirements [ ] Attached, Document ID:_____ [X] Not Applicable
13. Compliance Assurance Monitoring Plan [ ] Attached, Document ID:_____ [{X] Not Applicable
14. Acid Rain Application (Hard-copy Required) [ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:_____ [ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:_____ [ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:_____ [ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:_____ [X] Not Applicable

ATTACHMENT 1

List of Applicable Requirements for the Facility

Federally Enforceable Regulations Applicable to the Entire Facility

40CFR61.145
40CFR61.148
40CFR61.150
40CFR61.153
40CFR80.29
40CFR80.30
62-103.150
62-103.155
62-210.300(1)
62-210.300(2)
62-210.300(3)(a)
62-210.300(3)(b)
62-210.300(5)
62-210.300(6)
62-210.350(1)
62-210.350(2)
62-210.350(3)
62-210.360
62-210.370(3)
62-210.550
62-210.550
62-210.650
62-210.700(1)
62-210.700(2)
62-210.700(3)
62-210.700(4)
62-210.700(6)
62-210.900(1)
62-210.900(5)
62-212.300
62-212.400
62-212.600
62-213.205
62-213.400
62-213.410
62-213.412
62-213.420
62-213.430
62-213.440
62-213.460
62-213.900(1)
62-256
62-257
62-4.030
62-4.040
62-4.050
62-4.055
62-4.060
62-4.070
62-4.080
62-4.090
62-4.100
62-4.110
62-4.120
62-4.130
62-4.150
62-4.160
62-4.210
62-4.220

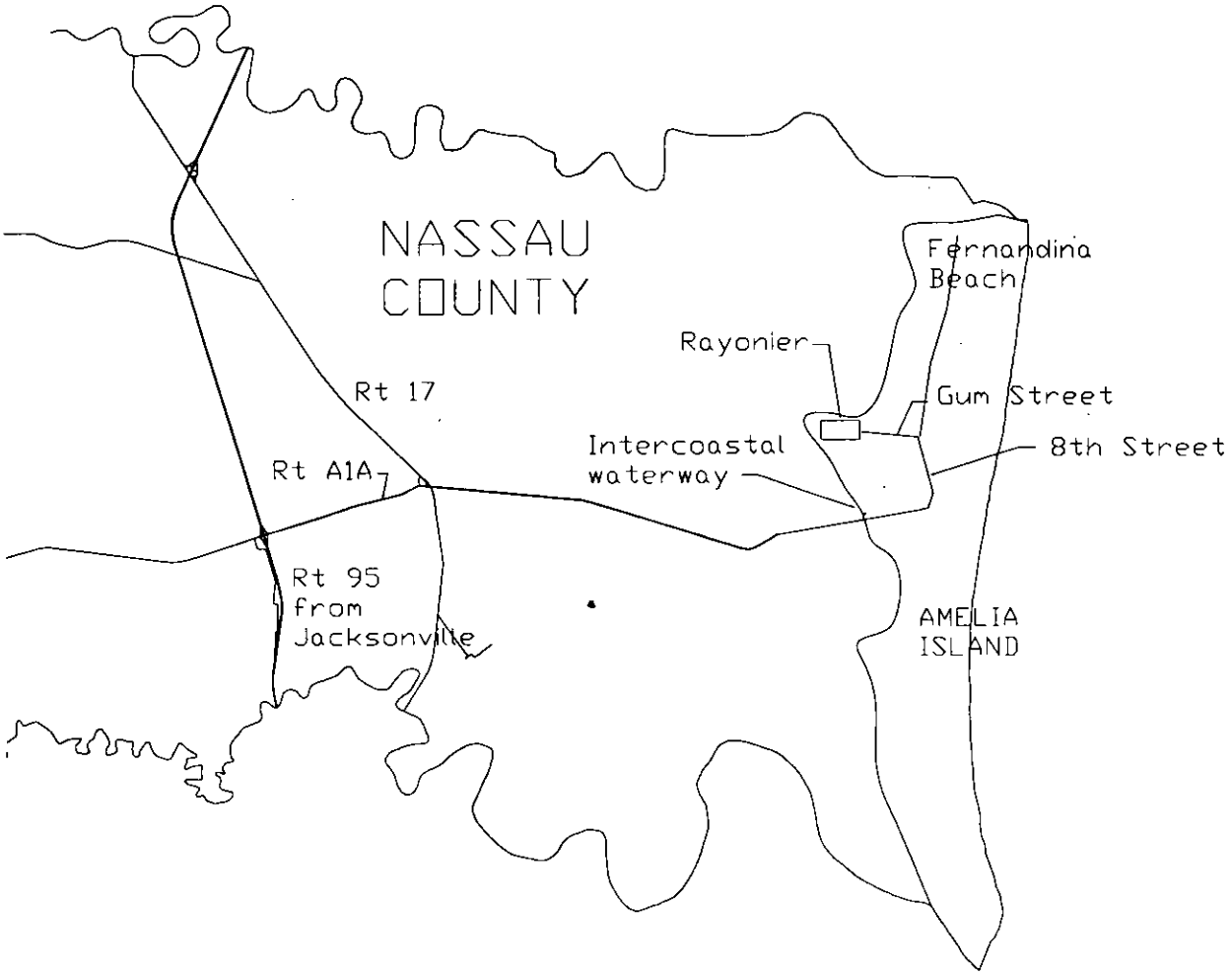
State Only Enforceable Applicable Regulations Applicable to the Entire Facility

62-296.320(2)

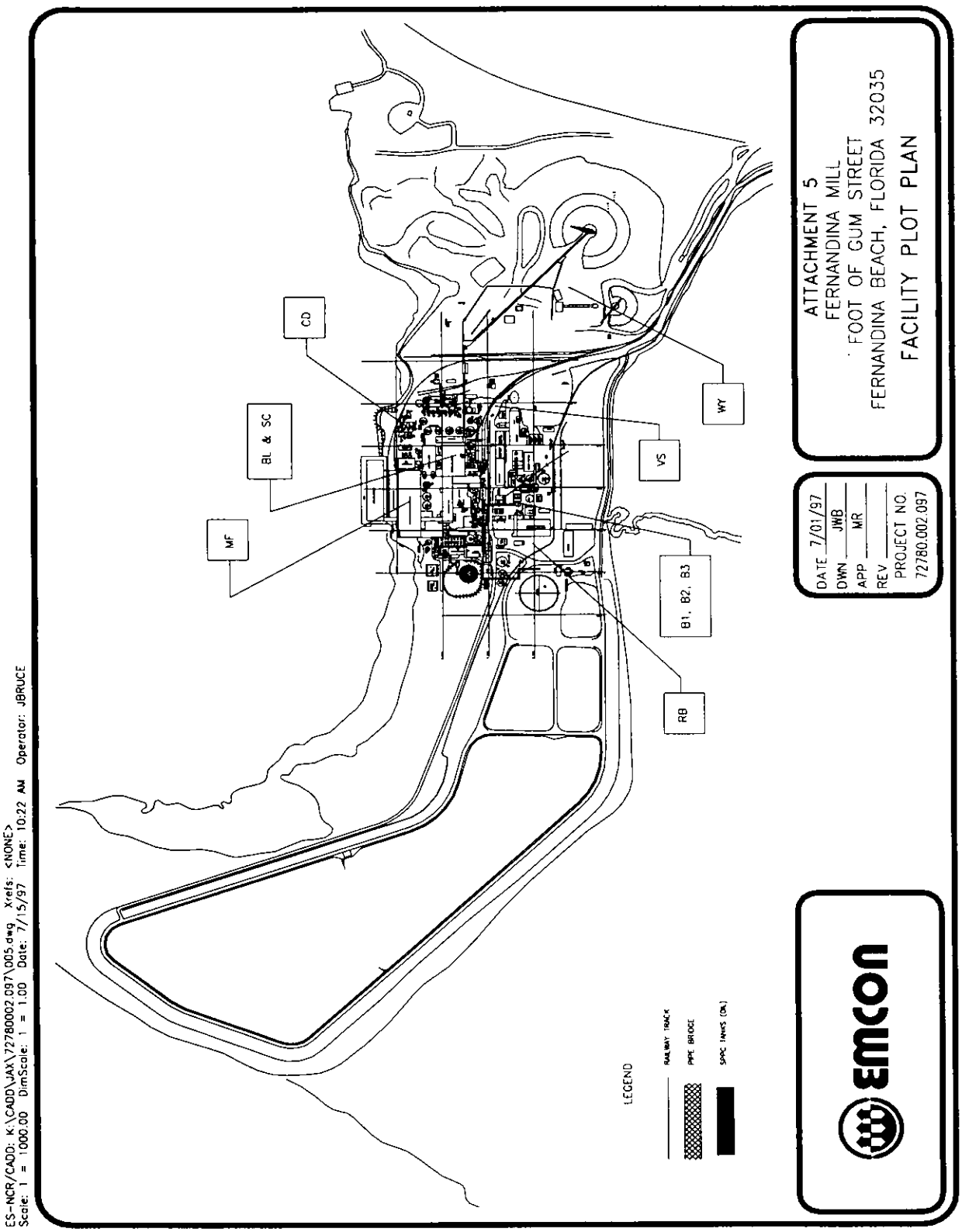
ATTACHMENT 2
List of Facility Pollutants

PM10	(Particles)	A
SO2	(Sulfur Dioixde)	A
NOx	(Nitrogen Dioxide)	A
CO	(Carbon Monoxide)	A
VOC	(Volitile Organic Compounds)	A
H115	(Methanol)	A
H038	(Chlorine)	A
H043	(Chloroform)	A
PB	(Lead)	B
H047	(Colbalt)	B
H120	(MEK)	A
H001	(Acetaldehyde)	A
H106	(HCl)	B
H095	(Formaldehyde)	B
H006	(Acrolein)	B
H118	(Chloromethane)	B
H163	(Styrene)	B
CFC	(totalCFCs)	B
H128	(Methylene chloride)	B
H033	(Carbon Tetrachloride)	B
H017	(Benzene)	B
H123	(Methyl Isobutyl Ketone)	B
H169	(Toluene)	B
H041	(Chlorobenzene)	B
H085	(Ethyl benzene)	B
H187	(Xylene)	B
H166	(1,1,2,2-tetrachloroethane)	B
H061	(1,4, dichlorobenzene)	B
H174	(1,2,4-trichlorobenzene)	B
H165	(TCDD)	B
H2S	(Hydrogen sulfide)	B
H167	(Tetrachloroethene)	B
H176	(Trichloroethylene)	B
H119	(1,1,1-trichloroethane)	B
H104	(Hexane)	B
H0323	(Carbon disulfide)	B
H117	(Bromomethane)	B
	(Chlorine dioxide)	A
H113	(Manganese)	B
H114	(Mercury)	B
H133	(Nickel)	B
H148	(Phosphorous)	B

ATTACHMENT 3
Area Map



ATTACHMENT 4
Facility Plot Plan



ATTACHMENT 5
Alternate Modes of Operation

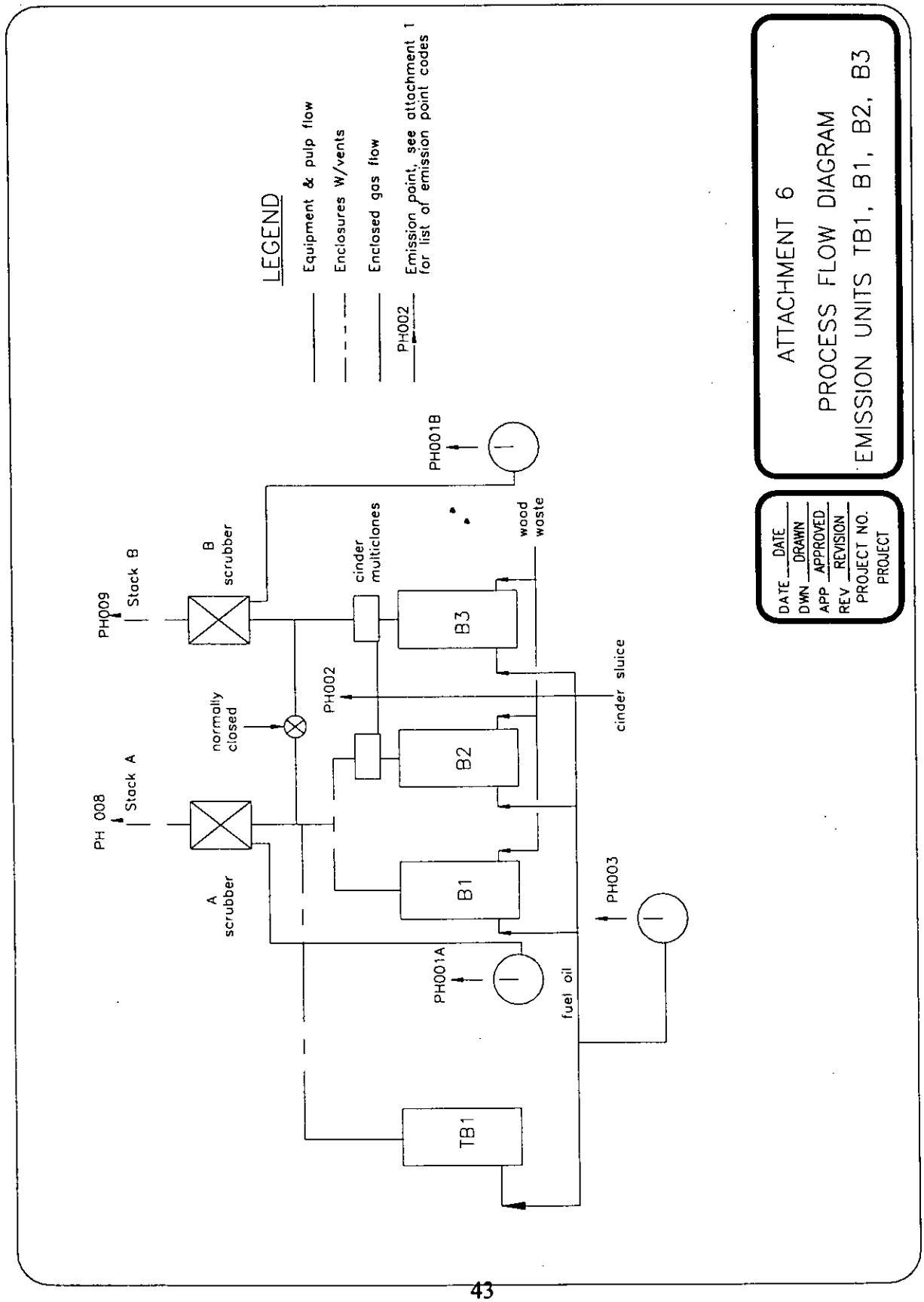
A temporary #6 fuel oil fired boiler will be leased and operated to produce steam to replace either no. 1 or no. 2 boiler while that boiler undergoes foundation repair. No. 1 boiler will be down for 4 months and no. 2 boiler will be down for 8 months, for an estimated total of 1 year to repair both boilers.

The temporary boiler will only replace either no.1 or no. 2 boiler while that boiler is undergoing foundation repairs. This temporary replacement boiler will be tied into the same scrubber and stack that nos. 1 and 2 boiler use. Because the emissions from the three boilers are not identical net emissions change slightly as the temporary boiler replaces first no.1 and then no. 2 boiler. Those changes are presented below.

SUMMARY OF EMISSIONS AND INCREASES/DECREASES

Pollutant	#1 boiler actual emissions 97 AOR	#2 boiler actual emissions 97 AOR	Temp boiler Potential emissions AP42	Delta emissions With temp on and #1 off	Delta emissions with temp on and #2 off	Delta emissions with repair of 8 mos. to No 2 and 4 mos. No. 1
PM10	111	159	151	41	-7	9
SO2	467	81	244	-223	162	34
CO	16	376	31	15	-345	-225
NOx	172	48	171	-1	122	81
VOC	1	10	7	6	-3	0

ATTACHMENT 6
Process Flow Diagram



DEP Form No. 62-210.900(1) - Form
Effective: 3-21-96

ATTACHMENT 7
Fuel Analysis Specifications

The following represent typical fuel analyses for the fuels to be used in this emissions unit.

NR 6 FUEL OIL
Description:..... Standard, commercially available residual, nr 6, fuel oil.
density..... 8.25 lb/gal
heat value..... 150,000 Btu/gal
percent Sulfur by weight Not to exceed 2.5%
percent nitrogen by weight 0.6%
percent ash by weight.... 0.03%
Additives ..... None

ATTACHMENT 8
Description of Control Equipment

POWER BOILER STACKS A & B:

Each of the two combination wood waste and oil boilers have multi-cyclone units with no re-injection of fly-ash. Under normal operations power boilers 1 and 2 feed A scrubber and boiler 3 feeds B scrubber. The scrubbers are AirPol "Wet Approach" Venturi with a throat approximately 7.5 ft. diameter gas inlet by 22 ft. high round cross section. The Venturi pressure drop is 15 inches water pressure. The Cyclone Entrainment Separator is 17 ft. in diameter and 39 ft high. 7,500 gallon Scrubbing Liquid Recycle Tanks are used. The scrubbers have met the particulate emissions standards routinely since installed in 1975.

Existing sulfur dioxide emissions are controlled by utilizing fuel oil with 2.5% sulfur content or less. In addition alkaline materials are added to the scrubbing media for pH control. This alkaline material removes sulfur dioxide from the flue gases. All boilers vent through a scrubber, including this temporary boiler.

The new boiler will have low excess air operations in the boiler reduce the air in the combustion flame zone, and thereby reduces the nitrogen available for thermal NOx formation. It will also have Low NOx Burners that control the air to fuel mixing and increase heat dissipation thereby further reducing the thermal NOx formed.

ATTACHMENT 9
Stack Sampling Facilities

POWER BOILER STACKS A AND B:

For each stack there are two sample ports oriented at a 90 degree angle, 56.5 feet (5.5 stack diameters) from the stack discharge and 40 feet (4 stack diameters) from any upstream changes in stack dimensions. A railed sampling platform for each stack with a bridge between stacks is provided along with a sampling equipment monorail for each port. Ladders with safety guards are provided to access the sampling platforms.