

# Memorandum

# Florida Department of Environmental Protection

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TO: Mike Cooke, Division of Air Resource Management

THRU: Trina Vielhauer, Bureau of Air Regulation  
Jeff Koerner, BAR - Air Permitting North

FROM: Bruce Mitchell, BAR - Air Permitting North

DATE: February 20, 2006

SUBJECT: Rayonier Performance Fibers LLC  
Fernandina Beach Mill  
Final Air Construction Permit  
Permit Project No. 0890004-018-AC

Attached is the final air construction permit for the Rayonier Performance Fibers LLC's existing Fernandina Beach Mill, which is located at The Foot of Gum Street in Fernandina Beach, Nassau County, Florida. The permit authorizes the replacement of three existing oil-fired power boilers (Nos. 1- 3) with a new wood-fired power boiler (No. 6). The new boiler is actually an existing pulverized coal-fired boiler that will be converted to a fluidized-bed boiler. Emissions will be controlled by staged combustion (NO<sub>x</sub>), an electrostatic precipitator (PM), and a wet alkaline scrubber (acid gases). The permit requires continuous emissions monitoring systems for opacity, CO, NO<sub>x</sub>, and SO<sub>2</sub> emissions.

The permit also authorizes an initial increase of the facility's production from 153,205 to 162,000 air dried metric ton (ADMT) per consecutive 12-months, rolling total. After successful installation of a new blow heat recovery system to control VOC emissions from all hot caustic extract (HCE) cells, the permit authorizes a final production increase to 175,000 ADMT per consecutive 12-months, rolling total. In order to achieve the increases in production, the permittee will also be authorized to perform the following construction and work: add a new HCE washer press roll; begin first improvements to pulp machine (drying and head-box); add a new HCE evaporator train; 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); and install a new post-HCE washer. The combined projects avoid PSD preconstruction review based on the netting analysis that includes the shutdown boilers.

We issued a draft permit package on January 26, 2006. The public notice was published in The News Leader on February 1, 2006. Comments were received from the applicant; however, no changes were made to the final permit other than corrections of typographical errors. "Day 90" is May 13, 2006. I recommend approval of the final air construction permit.

Attachments

MGC/tv/jk/bm