



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

December 7, 2005

CERTIFIED MAIL – Return 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: Application for Air Construction Permit  
Project: Power Boiler Replacement and Digester Production Increase  
Project No. 0890004-018-AC

Dear Mr. Perrett:

On October 20, 2005 and November 7, 2005, the Department received responses to an incompleteness letter regarding the above referenced project. Based on a review of the responses, we have determined that the application is still incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. With regard to the recovery boiler and the production increase, your application appears to be based on the assertion that no physical or operational changes are being made to the unit, the unit can physically accommodate the increased production, and no changes to the existing permits are necessary to accommodate the increased production. In light of the Department's proposed New Source Review Reform regulations, the Department is considering the "demand growth" information presented in your letter dated November 7<sup>th</sup>. Nevertheless, the application does include a PSD netting analysis, which requires that all contemporaneous emissions increases and decreases at the plant be included. Therefore, any increases or decreases related to the digester production increase must be included in the overall PSD netting analysis. Revise the PSD netting analysis to include the digester production increase. Please verify the CO and VOC emission rates from Power Boiler No. 6 as reported in the netting table. Note that it may be necessary to make slight adjustments to the requested emissions limits for Power Boiler No. 6 for the project to remain minor with respect to PSD applicability.
2. As presented in Attachment 1 (Page 17 of 22) to your letter response dated October 12<sup>th</sup>, VOC emissions from Power Boiler 2 are based on an AP-42 emission factor of 0.038 lb/MMBtu of heat input from bark firing. The original application form (Section F1) did not address VOC emissions from proposed Power Boiler No. 6. Table 10 in the Attachment 5 to the original application suggests annual VOC emissions of 7.4 tons/year from Power Boiler No. 6. Please verify the VOC emissions factor and rates from each fuel for Power Boiler No. 6 and provide the corresponding application pages. The Department intends to require at least initial testing to determine VOC emissions from the new unit.
3. In your letter response dated October 12<sup>th</sup>, Table 3 in response #9 compares maximum emissions in terms of "lb/MMBtu" to determine whether or not Power Boiler No. 6 is a "modified" boiler subject to NSPS Subpart Db. This analysis requires a comparison of mass emission rates (lb/hour) for the determination. Please identify the maximum heat input rates for the *original* Power Boiler No. 6 and update Table 3 based on mass emission rates (lb/hour). Will the proposed conversion of this boiler result in increased mass emission rates of any regulated pollutant and trigger NSPS Subpart Db requirements?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the

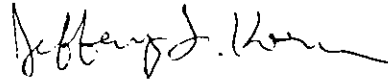
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State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,



Jeffery F. Koerner, P.E.  
BAR - Air Permitting North

cc: Mr. Chris Kirts, NED  
Mr. David Tudor, Rayonier Performance Fibers LLC  
Mr. David A. Buff, Golder Associates Inc.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 The Foot of the Gum Tree  
 Post Office Box 2002  
 Fernandina Beach, FL 32035-2002

**2. Article Number**

(Transfer from service label)

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**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery  
 Perrett Perrett 12/13

D. Is delivery address different from item 1?  Yes  
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0002

**3. Service Type**

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4. Restricted Delivery? (Extra Fee)  Yes

PS Form 3811, February 2004

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Se Mr. F. J. Perrett, Environmental Manager  
 Rayonier Performance Fibers LLC  
 Fernandina Beach Mill  
 St. The Foot of the Gum Tree  
 or Post Office Box 2002  
 Ci. Fernandina Beach, FL 32035-2002

PS Form 3800, January 2001

See Reverse for Instructions