



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 20 2010

Mr. David A. Buff, P.E., Q.E.P.
Principal Engineer
Golder Associates Inc.
6026 NW 1st Place
Gainesville, Florida 32607

Dear Mr. Buff:

This is in response to your letter dated April 23, 2010, regarding an alternative monitoring request for the Rayonier Performance Fibers, LLC (i.e., Rayonier) sulfite based pulp mill located in Nassau County, Florida. Rayonier has recently installed a new bleach plant scrubber that is subject to the Pulp & Paper MACT, 40 CFR Part 63, Subpart S, and is required to demonstrate continuous compliance by monitoring the gas scrubbers pH or the oxidation/reduction potential of the scrubber effluent, the gas scrubber vent inlet flow rate, and the gas scrubber liquid influent rate. In your alternative monitoring request letter submitted pursuant to 40 CFR § 63.453(m), you requested to monitor the on/off operation of the bleach plant exhaust gas fan as an alternative to monitoring the gas scrubber vent gas inlet flow rate. Justification for the alternative monitoring request is based on the pulp and paper industry's determination that the accuracy of available gas flow rate monitors has not been demonstrated in the chlorinated environment associated with bleach plant scrubber systems.

As you point out in your letter, EPA responded to the pulp and paper industry's concern regarding the lack of available flow rate monitors for bleach plant systems by providing guidance in the document titled "Questions and Answers (Q&A's) for the Pulp and Paper NESHAP" dated September 22, 1999. The Q&A states that monitoring fan operation instead of gas flow rate is allowable as long as a successful initial performance test of the gas scrubber is conducted while the fan is operating at maximum speed. Therefore, we approve your request to monitor the on/off operation of the bleach plant exhaust gas fan as an alternative to monitoring the gas scrubber vent gas inlet flow rate.

If you have any question on the above determination, please contact Lee Page of the EPA Region 4 staff at 404-562-9131.

Sincerely,

Kenneth R. Lapierre
Acting Director
Air, Pesticides and Toxics
Management Division

cc: Rita Felton-Smith, FDEP

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