

File 3/8



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

March 7, 2002

CERTIFIED - RETURN RECEIPT

Mr. Michael Burch, General Manager
Rayonier, Inc.
Foot of Gum Street
Fernandina Beach, Florida 32035-1309

Dear Mr. Burch:

Nassau County - AP
Rayonier, Inc.
AIRS ID No. 0890004
Request for Review and Approval of Initial
Performance Test Plan for the Determination of
Compliance with 40 CFR Part 63, Subpart S

On July 17, 2001, the Department received your request for review and approval of your facility's Initial Performance Test Plan for the determination of compliance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, 40 CFR Part 63, Subpart S. Additional information was requested September 4, 2001, October 24, 2001, and December 10, 2001. Responses to the requests were received from Rayonier, Inc. on September 25, 2001, and EPA Region IV on November 13, 2001 and February 8, 2002.

On February 19, 2002 the Department received an additional letter from Rayonier pertaining to the Initial Performance Test Plan. The letter specifically requested approval of the exclusion of the bar screen located prior to the Number 1 Pump Station from the WATER8 model in the mill's compliance determination.

In accordance with 40 CFR 63.7(c)(3)(i), the Department has reviewed the subject requests and hereby approves the submitted Initial Performance Test Plan with the following condition.

- Inclusion of the bar screen (located just prior to the Number 1 Pump Station) in the collection system module of the WATER8 program for the compliance determination.

The Department contacted the WATER8 and CHEMDAT8 hotline at (919)-541-5610. We were informed by Mr. Clark Allen that a bar screen could be added into the collection system module of the program. Instructions on how this can be accomplished are provided in the Read Me First file of the program software. Mr. Allen can be contacted at (919) 990-8645, if needed.

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In addition to the above condition, please note the following:

1. Rayonier will install two direct contact condensers to comply with the control requirements of 40 CFR 63.444. Because the monitoring requirements for this particular type of control device are not specifically addressed in section 63.453(b) – (1), Rayonier is proposing to use the final gas temperature and the liquid influent flow rate as the continuous monitoring parameters for the condensers. The Department approves the use of these parameters.
2. Rayonier proposes to send the effluent from the gas scrubbers and the two direct contact condensers to the biological treatment system in order to comply with 40 CFR 63.44(c)(2)(i). In the letter dated November 7, 2001, EPA Region IV approved the use of the biological treatment system as a control device to meet the requirements of Subpart S. The Department therefore approves the use of the biological treatment system for this purpose.
3. Rayonier proposes to use the WATER8 computer model to calculate methanol emissions from (2) open pump stations and also from the biological treatment system in order to assist in demonstrating compliance with 40 CFR 63.44(c)(2)(i). In the letter dated November 7, 2001, EPA Region IV approved the use of the WATER 8 model for the estimating of methanol emissions from the biological treatment system. The Department therefore approves the use of the WATER8 program for this purpose.
4. Rayonier proposes to use NCASI Test Method DI/MEOH-94.03 as an alternative to the NCASI test Method DI/MEOH-94.02 for water sampling and analysis. In the letter dated November 7, 2001, EPA Region IV approved the request to use NCASI test Method DI/MEOH-94.03 as an alternative. The Department therefore approves the use of this test method for this purpose.
5. Rayonier proposes to use NCASI Test Method CI/WP/98.01 as an alternative to EPA Test Method 308 for air sampling and analysis. In the letter dated February 8, 2002, EPA Office of Air Quality Planning and Standards approved the use of the NCASI Test Method provided that the tester used the appropriate correction factor. The Department therefore approves the use of this test method for this purpose.

Please also note that in accordance with 40 CFR 63.7(c)(3)(iii)(A) and (B), the Department's approval of the referenced Performance Test Plan does not relieve Rayonier, Inc. of its legal responsibility for compliance with any applicable provisions of Part 63, or any other applicable Federal, State, or local requirements or preventing the Department from implementing or enforcing Part 63 or taking any other action under the Clean Air Act.

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If you have any questions concerning this matter, please contact Rita Felton-Smith at
(904) 807-3237.

Sincerely,



Christopher L. Kirts, P.E.
Air Program Administrator


CLK:RFS

Enclosures

EPA Approval Letter dated November 7, 2001
EPA Approval Letter dated February 8, 2002

Cc: Bruce Mitchell, DARM
John Gay, Compliance and Enforcement
Martin Costello, BAMMS