



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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STATE OF FLORIDA
DEP - NE DISTRICT
JACKSONVILLE

4APT-ATMB

Christopher L. Kirts, PE
District Air Program Administrator
Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Dear Mr. Kirts:

The purpose of this letter is to provide you with written comments regarding issues raised in the three enclosed letters, all dated September 21, 2001, from Rayonier, Inc., Fernandina Mill, Fernandina Beach, Florida, pursuant to the Pulp & Paper MACT standard, 40 C.F.R. Part 63, Subpart S. In order to control methanol emissions, Rayonier, an ammonia base dissolving sulfite pulp mill subject to the requirements in 63.444, will enclose each digester system, evaporator system, and pulp washing system and vent the emissions into a closed-vent system. The closed vent system will be routed to gas scrubbers and direct contact condensers for methanol control. Effluent from the control devices is routed to a biological treatment system via open pump stations. As described in their compliance plan, Rayonier will comply with the emission limits specified in 63.444(c)(2)(i), which limits the methanol emissions from the equipment systems and the vents, wastewater, and condensate streams from the control device, to no more than 2.2 pounds of methanol per ton of oven dried pulp (lbs. of methanol per ton ODP). The issues, and our response to each, follows.

Use of WATER 8 for Estimating Emissions from the Collection and Treatment Systems

Rayonier plans to use the WATER 8 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 63.444(c)(2)(i). However, you have questioned the model's use for this purpose at sulfite mills. The WATER 8 model is incorporated into the test procedures for biological treatment system percent reduction calculations (i.e., 63.457(l)) in appendix C of part 63. Although 63.457(l) specifically references the requirements for kraft pulping process condensate requirements in 63.446(e)(2), the information obtained (i.e., the fraction of methanol removed) could appropriately be used in meeting similar requirements for sulfite mills in 63.444(c)(2)(i), and therefore we concur with the use of the WATER 8 model for estimating methanol emissions from Rayonier's biological treatment system. Also, staff from the U. S. Environmental Protection Agency (EPA) Office of Air Quality Planning and Standards (OAQPS) have been consulted and agree that the WATER 8 model can account for the turbulence created at open air pumps and would be appropriate to use for this scenario.

Use of Biological Treatment for Destruction of Methanol

Rayonier plans to send equipment vent emissions to gas scrubbers and direct contact condensers, with the effluent from these devices going to their biological treatment system. However, you have questioned whether the use of the biological treatment system as a control device is an option in 63.444(c)(2)(i). Rayonier has responded that there are no treatment methods specified in the regulation for sulfite mills and the treatment method is left to the mills' discretion since the only limitation is that the sum of the treatment emissions, plus other regulated emissions, must not exceed 2.2 lbs. of methanol per ton ODP. We concur with Rayonier's interpretation of the requirements in 63.444, and believe that their plan to use gas scrubbers and direct contact condensers as control devices and to demonstrate compliance by estimating methanol emissions from the control devices, open pumps, and biological treatment system meets the requirements of Subpart S.

Use of NCASI Method CI/WP/98.01 as an alternative to EPA Method 308

Rayonier is requesting to use the NCASI Test Method CI/WP/98.01 as an alternative to EPA Test Method 308 for air sampling and analysis. EPA has previously validated the NCASI Test Method CI/WP/98.01 for use at wood products plants, and also validated the NCASI Test Method CI/SG/PULP-94.02 for use at pulp mills. Although Rayonier provides information on the differences between the two NCASI methods, Method CI/WP/98.01 remains unvalidated for use at pulp mills, and therefore the alternative monitoring request will require a determination from the Emissions Monitoring and Analysis Division of OAQPS. Accordingly, Rayonier's information has been forwarded to Mr. Gary McAlister for handling.

Use of NCASI Method DI/MEOH-94.03 as an alternative to NCASI Method DI/MEOH-94.02

Rayonier is requesting to use the NCASI Test Method DI/MEOH-94.03, as an alternative to the NCASI Test Method DI/MEOH-94.02 for water sampling and analysis. EPA has previously validated the NCASI Method 94.02 and has incorporated the method into Subpart S. Based on Rayonier's documentation, version 94.03 was necessary to conform to the contents and format established by EPA for wastewater test methods, and no changes were made to the actual test method procedures. Therefore, Region 4 approves Rayonier's request to use NCASI Test Method DI/MEOH-94.03 as an alternative test method to NCASI Method DI/MEOH-94.02.

If further assistance is needed, please contact Lee Page of the EPA Region 4 staff at (404)562-9131.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Douglas Neeley", with a stylized flourish at the end.

for R. Douglas Neeley
Chief
Air Toxics and Monitoring Branch
Air, Pesticides and Toxics
Management Division

Enclosures

cc: Michael Burch, General Manager, Rayonier