



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

FEB 8 2002

Mr. Michael Burch
General Manager
Rayonier
The Foot of Gum Street
P.O. Box 2002
Fernandina Beach, FL 32035-2002

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

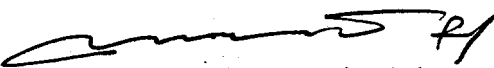
FEB 15 PM 1
STATE OF FLORIDA
DEP - NE DISTRICT
JACKSONVILLE

Dear Mr. Burch:

This is in response to your letter dated September 21, 2001, that requests the approval of an alternative test method for measuring methanol emissions from your dissolving sulfite pulp mill in Fernandina Beach, Florida. The method that you are proposing would be an alternative to Method 308 required by 40 CFR Part 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, Section 63.457(b)(5)(i). You are proposing to use a procedure titled, "Chilled Impinger/Silica Gel Test Tube Method at Pulp Mill Sources for Methanol, Acetone, Acetaldehyde, Methyl Ethyl Ketone and Formaldehyde (NCASI Method CI/WP-98.01)," developed by the National Council for Air and Stream Improvement (NCASI) to measure methanol. The NCASI, by letter dated October 30, 2001, submitted data in support of this request. We have reviewed these data and concluded that this method met Method 301 criteria for measuring methanol, provided that the tester uses the appropriate correction factor. A summary of the emission sources for which this method can be approved and the appropriate correction factors is enclosed. Based on the data submitted by the NCASI and the similarity of the gas streams for which you propose to use the method to the gas streams from which the NCASI collected their supporting data, we are approving your request for use of this alternative test method at your facility in Fernandina Beach, Florida.

If you need further assistance, please contact Gary McAlister at (919) 541-1062.

Sincerely,


J. David Mobley, Acting Director
Emissions Monitoring and Analysis Division

Enclosures

cc: Mr. Stephen Shedd, EPA/OAQPS/ESD
Mr. Lee Page, Region 4,
Mr. Christopher Kirts, PE

CORRECTION FACTORS FOR NCASI METHOD CI/WP/98.01

SOURCE	CORRECTION FACTOR
Browstock Washer Hood	NA
Bleach Plant Scrubber Inlet	NA
Smelt Dissolving Tank	1.04
Recovery Furnace	1.04