



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal:

Table with 2 columns: Applicant Information (C.A. McDonald, General Manager, Rayonier Performance Fibers, LLC) and Permit/Location Information (FINAL Permit Project No.: 0890004-042-AV, Nassau County).

Enclosed is the FINAL Permit, No. 0890004-042-AV. The purpose of this permit is to revise the Title V air operation permit No. 0890004-041-AV for the above referenced facility to incorporate Air Construction Permit Nos. 0890004-036-AC and 0890004-040-AC. The facility is located in Nassau County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

Handwritten signature of Richard S. Rachal III

Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

RSR: lm

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on May 06, 2014 to the person(s) listed or as otherwise noted:

Mr. C.A. McDonald, General Manager- Rayonier Performance Fibers, LLC:
(ca.mcdonald@rayonier.com)

Mr. David Rogers, Manger, Environmental Operations- Rayonier Performance Fibers, LLC:
(david.rogers@rayonier.com)

Mr. Davis Buff- Golder Associates Inc.: (dbuff@golder.com)

Ms. Natalia Gonzalez, EI - Golder Associates Inc.: (Natalia_Gonzalez@golder.com)

Ms. Natasha Hazziez, U.S. EPA Region 4: (hazziez.natasha@epa.gov)

Ms. Barbara Friday, DEP BAR: (barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

May 06, 2014
(Date)

FINAL Determination

I. Comment(s).

Comments were received from Natalia Gonzalez, EI at Golder Associates Inc. on March 13, 2014. The comments were not considered significant enough to issue a Revised DRAFT/Proposed Permit and require another public notice. The changes made are shown below.

A. Facility Issues

1. Remove Specific Condition No. A.10. This EU is subject to the attached Compliance Plan, Appendix CP2.
 Construction is complete.

RESPONSE:

Specific Condition No. A.10. has been removed and Compliance Plan, Appendix CP dates have been updated:

The construction of the blow heat recovery system was completed on October 15, 2011, but the construction of all components of the pulp dryer improvements required to achieve the 175,000 ADMT-per-year pulp production limit has not been completed. The table listed below lists the improvements which may be needed to achieve the 175,000 ADMT per year production rate and the tentative schedule date:

Task	Tentative Completion Date
Steam Supply and Condensate Modifications	2013 <u>2017-2018</u>
Machine Fan Heater Replacements	2011-2013 <u>2016-2018</u>
Dryer Can Replacements	2012-2015 <u>2013-2018</u>
Drives an Motor Control Center	2012-2015 <u>2017-2018</u>
Oil System Filtration and Heat Exchange	2013 <u>2018</u>
Improved Thread-Up System	2015 <u>2017</u>
Air Supply and Exhaust Upgrades	2016 <u>2018</u>
Press Hydraulic System	2013 <u>2016-2018</u>
Drum Reel Replacement	2015 <u>2018</u>
Lo-Vac Header Upgrade	2014 <u>2018</u>
Steam Profiling Box	2015 <u>2018</u>
Blend Chest Pump Upgrade	2012 <u>2018</u>

These improvements must be conducted over time and during scheduled Mill annual outages.

2. SECTION III. EU Description.

...~~4000 gpm~~. The main issue is that the wet scrubber sprays re-circulated alkaline scrubber water over a series of chevrons and louver-type packing to reduce acid gas emissions.

RESPONSE:

Emissions Unit Number	Brief Description
022	<p>No. 6 Power Boiler is a Bubbling Fluidized Bed boiler that produces steam for electrical generation and usage in the manufacturing process...</p> <p>Acid gases are controlled by a wet alkaline scrubber located after the ESP and induced draft fan. The wet scrubber sprays approximately 4000 gpm of re-circulated alkaline scrubber water over a series of chevrons and louver-type packing to reduce acid gas emissions. The design pressure drop across the system is approximately 2 inches of water column....</p>

3. EU022 Specific Condition No. D.7. did not have the SO2 emission of 180 lbs/hr (3 hour average) in the Draft/Proposed permit.

RESPONSE.

EU022 Specific Condition No. D.7.c. has been added to the Title V Permit.

D.7. Sulfur Dioxide (SO₂) Emissions (As determined by CEMS data):

[c. SO2 emissions shall not exceed 180 lbs/hr \(3 hour average\).](#)
[\[Air Construction Permit No. 0890004-036-AC\]](#)

4. Date correction to Specific Condition No. D.51.

RESPONSE:

FROM: D.51. Compliance Date. The owner or operator shall comply with the applicable emission limitations and operating limitations of 40 CFR 63 Subpart DDDDD no later than ~~March 21, 2014~~. [40 CFR 63.7495(b)]

TO: D.51. 40 CFR 63, Subpart DDDDD -Compliance Date. The owner or operator shall comply with the applicable emission limitations and operating limitations of 40 CFR 63 Subpart DDDDD no later than the compliance date specified within the Subpart, i.e. [January 31, 2016](#).

[40 CFR 63.7495(b)]

5. Specific Condition No. D.54. is a duplicate of D.51. except for the date.

RESPONSE:

D.54. has been removed from the permit.

II. Conclusion.

In conclusion, the changes that have been made are insignificant in nature and do not impose additional public noticing requirements. The permitting authority hereby issues the FINAL Permit, with any changes noted above.