

Rayonier

Performance Fibers

Jesup Mill

August 28, 2006

Peter S. Courtney, P.E., P.G.
Air Protection Branch
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

RE: Application for Exemption to Install, Operate and Maintain BART
Pursuant to 40 CFR 51.303

Dear Mr. Courtney:

Section 40 CFR 51.308 requires each state to develop a State Implementation Plan ("SIP") designed to address regional haze in mandatory Class I areas defined by the federal Clean Air Act. One element of the SIP involves the installation, operation and maintenance of Best Available Retrofit Technology ("BART") on emission units constructed between August 7, 1962 and August 7, 1977 if their emissions of sulfur dioxide ("SO₂"), nitrogen dioxide ("NO_x") and/or volatile organic compounds ("VOC") exceed 250 tons per year, referred to as "BART eligible sources", if these sources cause or contribute to Visibility Impairment. To determine if a BART eligible source will become subject to BART involves an analysis of the regional haze impacts on Class I areas within 300 kilometers of the sources emissions of the three pollutants mentioned above. This analysis demonstrates that the impact of the BART eligible sources is less than 0.5 deciviews at all four of the Federal Class I areas within 300 kilometers.

Rayonier Performance Fibers LLC Jesup Mill has three BART eligible emission units: No. 5 recovery boiler, No. 5 smelt tank and No. 3 bark and oil boiler, the wastewater treatment system, C-Mill (digesters, brownstock washers and bleach plant), and E evaporators. However the wastewater treatment system, C-mill (digesters, brownstock washers and bleach plant), and the D-evaporators do not emit visibility impairing pollutants (NO_x, SO₂, or PM₁₀) and were not included in the modeling analysis. To determine if these BART eligible sources should become subject to BART a modeling analysis of impacts from their emissions on nearby Class I areas was conducted. Section III of EPA's guidance to the states on the preparation of Regional Haze SIPs, found at Appendix Y to 40 CFR Part 51 provides the process for this analysis. Essentially a threshold is established, a modeling protocol developed using EPA's CALPUFF model and the modeling is performed and compared to the threshold. The State then determines whether the emission unit is subject to BART.

The Guidance recommends 0.5 deciviews as the threshold. The Regional Planning Organization (VISTAS for Georgia), EPA, Federal Land Managers and the states have developed a protocol for this demonstration involving the use of the CALPUFF model

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using certain default options, given meteorology and the worst case normal operating day in the period 2002 to 2004.

On April 27, 2006, Weston Solutions, Inc. submitted the Modeling Protocol for the Jesup Mill BART exemption application to the State of Georgia. The Modeling Protocol was also submitted to representatives of the Federal Land Managers of Federal Class I areas within 300 kilometers via the Air Protection Branch of the Environmental Protection Division. On June 26, 2006, comments were received from the State of Georgia and the various Federal Land Managers in a letter from Peter S. Courtney to David Rogers of Rayonier

In response to the June 26 2006 comments received from the Air Branch, the modeling report includes the following: (1) All Class I areas within 300 kilometers were modeled; (2) Appropriate Class I receptor sets were obtained from the National Park Service; (3) The settings used in each of the CALPUFF system modules are listed in the report; (4) BPIP files addressing GEP stack height have been previously sent to GAEPD; (5) All Class I areas modeled are >50 km, therefore no downwash was used; (6) Emission calculations and PM₁₀ speciation are provided in Appendix A of the modeling report; and (7) Modeling was conducted according to VISTAS protocol, alternative methods were not used. All of the comments on this Modeling Protocol were addressed in the final modeling.

This analysis demonstrates that the impact of the BART eligible sources is less than 0.5 deciviews at all four of the Federal Class I areas within 300 kilometers. Attached is a final report of the Analysis resulting from the Modeling Protocol. Also enclosed is a CD of the modeling input files.

As requested by the Division, copies of this submittal with the three attachments have been provided to the four Federal Land Managers as listed below and Brenda Johnson at EPA-Region IV. It is understood that to meet the Reasonable Further Progress requirements of the regional haze rule, controls in addition to BART could be required. However, based on this analysis Rayonier Performance Fibers LLC requests notification that the Jesup Mill is not subject to additional BART analysis.

If you have questions regarding this application please contact David Rogers at (912)427-5424, email: david.rogers@rayonier.com or David Tudor (904)277-1452, email: david.tudor@rayonier.com. If there is a specific modeling question you may contact Kevin Eldridge of Weston Solutions, Inc. at (919)424-2222, email: kevin.eldridge@westonsolutions.com

Sincerely,



David Rogers
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