



# Florida Department of Environmental Protection

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## Via U.S. Mail and Electronic Mail

April 26, 2018

Mr. Trey Glenn  
Regional Administrator  
U. S. Environmental Protection Agency (EPA) – Region 4  
61 Forsyth Street, SW – Mail Code: 9T25  
Atlanta, GA 30303-8909

Re: Air Program Pre-Hearing Submittal: Proposed Revision to Florida's State Implementation Plan – Redesignation Request and Maintenance Plan for the Nassau County 2010 Sulfur Dioxide (SO<sub>2</sub>) Nonattainment Area

Dear Mr. Glenn:

Pursuant to 40 C.F.R. 51.102, the Florida Department of Environmental Protection (Department) is submitting a pre-hearing State Implementation Plan (SIP) package to revise Florida's SIP under the federal Clean Air Act (CAA).

On June 22, 2010 (effective August 23, 2010), the U.S. Environmental Protection Agency (EPA) promulgated a revised NAAQS for the air pollutant SO<sub>2</sub>. 75 Fed. Reg. 35,520. The level of the revised standard is 75 parts per billion (ppb), based on a three-year average of the annual 99<sup>th</sup> percentile of one-hour daily maximum concentrations. The revised SO<sub>2</sub> standard is the first one-hour primary standard promulgated by EPA for this air pollutant.

On August 5, 2013 (effective October 4, 2013), EPA designated an area in Nassau County, Florida "nonattainment" for SO<sub>2</sub> based on ambient SO<sub>2</sub> monitoring data in the area showing violation of the revised standard over the three-year period 2009-2011. 78 Fed. Reg. 47,191. The designated nonattainment area is described as follows:

*That portion of Nassau County encompassing the circular boundary with the center being UTM Easting 455530 meters, UTM Northing 3391737 meters, UTM zone 17, using the NAD83 datum (the location of the violating ambient monitor) and the radius being 2.4 kilometers.*

78 Fed. Reg. 47,198. The only point source of SO<sub>2</sub> emissions within the Nassau County NAA is a pulp and paper mill – Rayonier Performance Fibers, LLC Fernandina Beach Sulfite Pulp Mill (Rayonier). An additional pulp and paper mill – WestRock CP, LLC<sup>1</sup> Fernandina Beach Mill (WestRock) – is immediately adjacent to the NAA.

In 2012, Rayonier received an air construction permit from the Department to construct a new, taller stack for the Vent Gas Scrubbing System, extend the stack at the Power Boiler if needed, and lower the allowable SO<sub>2</sub> emission limits for several units.<sup>2</sup> In 2015, WestRock received an air construction permit from the Department to implement a variety of controls, including improvements to the recovery boilers and installation and operation of a piping system to transport non-condensable gases for combustion in the No. 7 Power Boiler.<sup>3</sup>

These two permits formed the basis of the Department’s attainment demonstration for the Nonattainment Area State Implementation Plan (NAA SIP) submitted to EPA on April 3, 2015. The NAA SIP was fully approved by EPA on July 3, 2017 (effective August 2, 2017). 82 Fed. Reg. 30,749. The NAA SIP was fully implemented with the completion of all construction and controls by December 1, 2017.

Florida hereby provides EPA with the pre-hearing SIP package requesting redesignation of this area to attainment and approval of an associated Maintenance SIP that is designed to ensure the continued attainment of the 2010 SO<sub>2</sub> NAAQS in the area around the Rayonier and WestRock facilities in Nassau County.

The Department has sent the complete pre-hearing SIP submittal package (hard copy and electronic copy) directly to the Air Planning Branch. The electronic copy is in a searchable format and is an exact duplicate of the hard copy. On April 26, 2018, the Department published in the Florida Administrative Register a notice of opportunity to submit comments regarding this proposed SIP revision, request a public hearing, or participate in a public hearing on June 1, 2018, if requested.

The Department respectfully requests that EPA provide any comments on this submittal by May 29, 2018. If you have any questions, please contact Hastings Read at (850) 717-9017 or by email at [Hastings.Read@dep.state.fl.us](mailto:Hastings.Read@dep.state.fl.us).

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<sup>1</sup> WestRock CP, LLC was formerly known as RockTenn CP, LLC. The legal name was changed September 1, 2015.

<sup>2</sup> See Air Construction Permit 0890004-036-AC issued by the Florida Department of Environmental Protection on April 12, 2012.

<sup>3</sup> See Air Construction Permit 0890003-046-AC issued by the Florida Department of Environmental Protection on January 9, 2015.

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Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffery F. Koerner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffery F. Koerner, Director  
Division of Air Resource Management

JFK/tl  
cc (with Pre-Hearing SIP package): R. Scott Davis, Chief, Air Planning Branch, EPA  
Region 4