



Conserve Nassau

1417 Sadler Road, #187, Fernandina Beach, FL 32034

March 29, 2024

Mr. David Read, Permit Review Section
Department of Environmental Protections Division of Air Resource Management
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

Via email:

TO: David.Read@floridaDEP.gov

Cc: yarborough.clay.web@flsenate.gov, dean.black@myfloridahouse.gov

Subject: Draft Air Permit No. 0890004-070-AC Rayonier Performance Fibers, LLC, Fernandina Beach Dissolving Sulfite Pulp Plant Nassau County, Florida

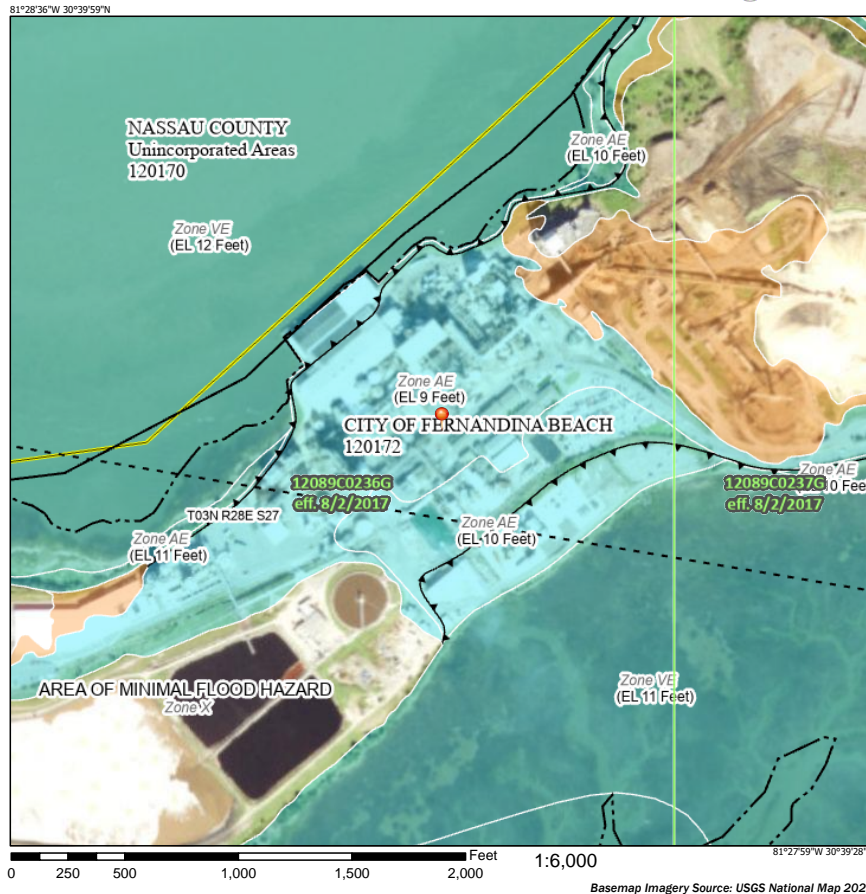
Dear Mr. Read:

The Conserve Nassau Board of Directors and our Conserve Nassau Ambassadors (ConserveNassau.org) are writing to express our concerns regarding the ethanol plant proposed by RYAM in Fernandina Beach, Florida. While we are generally supportive of pursuing sustainable energy initiatives, we are alarmed by the location of this plant, the deficiencies in the application and the apparent inability of RYAM representatives to provide clear information regarding this operation. We are concerned that the granting of this permit will have negative consequences for our entire community.

- 1. Location within a community:** The proposed ethanol plant will be on a small peninsula in the Amelia River in the heart of the City of Fernandina Beach (population roughly 13,700). The location (Map 1) lies on the edge of a residential area and is very close to the historic district, city government offices and the commercial core of the city, which is fundamental to the economy of both the city and Nassau County. Tourism is a major part of the economy, and tourists, as well as residents, are already complaining about odors from the plant. It is also very close to the city waterfront that is used commercially, for recreation and entertainment. Southside Elementary and St. Michael's schools are located 1 mile from RYAM, while the middle and high schools are 2 miles from the facility. The National Center for Biotechnology Information in its Environmental Health Perspective (Oct 2016) and the World Health Organization recommend a minimum of 2 miles between hazardous facilities and schools, nursing facilities and government offices. Considering the history of bioethanol plants and many other chemicals in use in this plant, the Fernandina Beach plan does not seem wise.



National Flood Hazard Layer FIRMette



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee. See Notes, Zone X
- Area with Flood Risk due to Levee Zone D

OTHER AREAS

- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES

- Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS

- Digital Data Available
- No Digital Data Available
- Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

Map 2. Storm Surge and Flooding at RYAM in a 100-year storm at current sea level (FEMA Flood Hazard Area FIRMette)

- Increased Health Risks to the Community:** There are legitimate concerns regarding the potential emission of toxic fermentation by-products, including acrolein, acetaldehyde, and methanol. Past incidents in similar facilities have demonstrated the health risks posed by these substances to nearby communities. It is imperative to thoroughly evaluate and mitigate these risks to safeguard public health. Residents have been concerned about emissions for some time. In addition to the odors, many report light particulate matter on their cars in the morning and black ash on their windows, not to mention the many years it took the plant to conform to limits on sodium dioxide.
- Increased Risk of Fire and Explosion:** The proposed bioethanol plant increases the risk of fire and explosion hazards in our community in the processing, handling, and storage of volatile ethanol. Coupled with the existing on-site storage of hazardous materials such as molten sulfur and chlorine gas, these risks are further compounded. Evacuation from this barrier island in such a disaster with up to 40,000 tourists in addition to residents could be impossible. In any such case, appropriate emergency equipment, materials and expertise must be available on site and in the community to



deal with fires, leakage, explosions, etc., yet this does not seem to be the case. Considering the nature of the product, relying on Jacksonville, as has been done in the past, is unacceptable.

7. **Violation of Fernandina Beach Comprehensive Plan:** This process violates Comprehensive Plan Policy 1.07.12 Industrial (IN):

g. Heavy metal fabrication, batch plants, salvage yards, chemical or petroleum manufacturing or refining, rubber or plastics manufacturing, or other uses generating potentially harmful environmental or nuisance impacts shall be prohibited.

The proposed bioethanol plant is simply not appropriate for its designated location in Fernandina Beach or any other urban area. We urge the Florida Department of Environmental Protection to deny any permit that would allow this plan to move forward. Our community is alarmed about the potential threat to their safety, health risks from the emissions, their property values, and increased homeowner and auto insurance costs due to this potentially hazardous plant.

Thank you for considering our concerns. We trust that the Department will prioritize transparency, accountability, and public safety in its decision-making process.

Sincerely,

Margaret Kirkland, Len Pearlstine, Joyce Tuten, Cheryl Witt, Elise Pearlstine, Wendy Burdick, Lauree Hemke, Frank Hopf, Tammi Kosack, Robert Prager, Betsie Huben, Pastor Carlton Jones, Richard Polk, Terry Grady, Cynthia Jones-Jackson and Faith Ross

Conserve Nassau Board of Directors and Ambassadors

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202-714-9882

www.ConserveNassau.org

