

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

Townhall Meeting Regarding RYAM G-2 Bioethanol Plant

March 18, 2024

Conserve Nassau Concerns

While Conserve Nassau is generally in support of the development of fuel sources that reduce our carbon footprint, we are concerned about the production and transport of bioethanol at the RYAM Fernandina Beach site.

- The RYAM location is in the FEMA Special Flood Hazard Area. Based on the Fernandina Beach vulnerability study, the Nassau County vulnerability study and FEMA maps, this site is currently subject to flooding and storm surge in a 100-year storm with our current sea level. RYAM staff have denied this. (See map on p. 3.)
- 2. The proximity of the production, loading and transport of volatile organic compounds to the residential, historic and commercial core of the city, numerous workplaces, families with children and the location of many public events is concerning. This area provides the largest segment of both City and County revenue. (See map on p. 2.)
- This process violates the FB 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.
- 4. **Community trust and confidence**: Despite the long-term support the community has provided Rayonier/RYAM, the company has failed to address pollution issues or to discuss them openly. These issues include:
 - a. Odors
 - b. Noise
 - c. Showering of small particulate matter and black ash in the community
 - d. Lack of thorough testing of emissions within the community
 - e. Longstanding history of being out of compliance on sodium dioxide
 - f. Current failure to comply with dissolved oxygen standards
 - g. Failure to adhere to sludge site requirements in Yulee
- 5. The community expects sufficient regulation and oversight in such a vulnerable location, including:



- a. Operational Risk Analysis for production and shipping.
- b. Analysis of the adequacy of our roads and other means of transport for such a volatile product.
- c. At least annual testing of the scrubber.
- d. Strict safety guidelines for purchase of equipment for handling and processing the product, strict quality guidelines for all related equipment, and strict guidelines for handling emergencies and storm conditions.
- e. Hiring of expert operators and supervisors.
- f. Appropriate emergency equipment, materials and expertise available on site and in the community to deal with fires, leakage, explosions, etc. Considering the nature of the product, relying on Jacksonville is unacceptable. RYAM must be responsible for and fund such equipment and expertise and be responsible for all damage.
- g. Prior to permitting, we request composite data for emissions and effluents entering the air and water from the plants at RYAM, WestRock and activities at the Port of Fernandina. We also expect to see dissolved oxygen levels in the Amelia River at a variety of sites and phases of the effluent process.





