



300 Osborne Street
St. Marys, GA 31558

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November 30, 2022

Mr. D. Ahn Vo
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256-7577

Re: Permit FL0000701 Comments

Please find below the requested information suggested for Comments.

Commenter:

Emily Floore
St. Marys Riverkeeper, INC
300 Osborne Street
St. Marys, GA 31558
Voice: (843) 906-6548

Applicant:

Rayonier Performance Fibers, LLC
Fernandina Dissolving Sulfite Pulp Mill
10 Gum Street
Fernandina Beach, Florida 32034-4285
Nassau County

Department Permit File Number:
FL0000701 – IW1S

Location of Proposed Project:
Nassau County, Florida

Statements of Fact:

Subject: Mixing Zone Parameters Aluminum and Iron

- A. The Draft Permit allows for 2.4 mg/L of Total Recoverable Iron and 3.9 ug/L (or 0.0039 mg/L) of Total Recoverable Aluminum to be released into the mixing zone.
- B. Class III Water Quality Standards for Marine Waters outside of the mixing zone allows for ≤ 0.3 mg/L of Iron and ≤ 1.5 mg/L of Aluminum
- C. In June of 2022, The Watershed Assessment Verified and Delist Lists determined that the **Amelia River (WBID 2124A) did not meet water quality standards for Aluminum**



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and Iron and was added to the State's Verified List of Impaired Waters and the Clean Water Act Section 303(d) list. The process will now begin to determine the TMDL to represent the maximum amount of pollutant loading that can be discharged to a waterbody and have its designated uses met. (FDEP, 2020-2022 Biennial Assessment Final Verified and Delist Lists).

- D. FDEP comments regarding metal impairments on the Final Verified List (FDEP, 2020-2022 Biennial Assessment Final Verified and Delist Lists excel sheet):
1. Iron impairment: "This waterbody is impaired for this parameter based on the number of exceedances for the sample size. **After further investigation, FDEP cannot rule out the possibility of anthropogenic sources.** This parameter is being added to the Verified List and the department is requesting EPA add it to the 303(d) List."
 2. Aluminum impairment: "This waterbody is impaired for this parameter based on the number of exceedances for the sample size. This parameter is being added to the Verified List and the department is requesting EPA add it to the 303(d) List."
- E. **With an already impaired waterway, these metals should not continue to be discharged into the waterbody.** Suggestions moving forward to remedy the identified impairments (FDEP, Alternative Restoration Plans):
1. Continued monitoring should be completed by FDEP;
 2. A restoration plan should be discussed with stakeholders to quickly bring the waterbody back to meeting state water quality standards and keep the river off the 303(d) list;
 3. An investigation to identify the source of contaminations;
 4. BMAPS developed

Subject: Mixing Zone Parameters DO (July – Sept)

A. Water Quality Standard

1. "A Site Specific Alternative Criterion, or SSAC, is a water quality criterion developed for a particular waterbody or segment of a waterbody that is designed to more accurately reflect site specific conditions. Criteria, including site specific criteria, are one of the components of Florida's surface water quality standards, and are intended to protect designated and existing uses of the state waters." (FDEP)
2. Amelia River has a DO SSAC, which stipulates that all DO values shall be > 3.2 during low tide from July 1 to September 30 and > 4.0 mg/L during all other conditions, and all 24-hour DO averages are > 5.0 mg/L.
3. Within a mixing zone, DO levels can reach 1.5 mg/L but must meet the SSAC criteria at the mixing zone boundary.
4. The Draft permit has the DO (July – Sept.) mixing zone permit limit of 1.5 mg/L but across the entire mixing zone area of 616.8 sq. m. **The mixing zone area for this parameter during the warmer months should be reduced to enable the**



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DO to meet the SSAC criteria at the mixing zone boundary or the mixing zone permit limit for DO should be higher to allow for the surrounding water to recover from the DO impairment.

5. The Amelia River (WBID 2124A) is impaired for DO although it is not verified as there is no confirmed pollutant source. **DO Saturation is not impaired but the Amelia River is impaired for SSAC.**

B. Species and Habitat

1. Consideration should be given to the endangered and threatened species that migrate and/or breed in the area. With a DO impaired waterbody, sources of food may become limited for many of our critical year-round and seasonal species. US Fish and Wildlife Service (FWS) IPaC resource list has identified several threatened and endangered species that could be potentially affected by activities in the area including critical habitats for Birds of Conservation Concern. Utilizing the Endangered Species Act, Clean Water Act, and Migratory Birds Treat Act, appropriate regulations and maximum conservation efforts should be followed by any person, organization, or industry that plans to conduct activity that may negatively impact or impair habitat area and food supply.
2. The State of Florida lists the following uses for Class III waters as: Fish Consumption, Recreation, Propagation and Maintenance of a Healthy, Well-Balanced Population of Fish and Wildlife.
3. The Amelia River is a nursery for sharks and is home to many fishing industries both commercial and recreational. A healthy waterway is needed to sustain the balance of the river's ecosystem.