

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**Northeast District Office  
7825 Baymeadows Way, Suite 200 B  
Jacksonville, FL 32256-7590**

**AMENDED FACT SHEET  
APPLICATION FOR WASTEWATER PERMIT TO DISCHARGE  
TO WATERS OF THE STATE**

Permit No.:	FL0000876	Application No.:	271462
Permit Writer:	Vincent Seibold/Melissa Long	Application Date:	May 25, 1995
		Amended:	January 31, 2005

Additional Information: Received through October 6, 2005

Name and Address of Applicant

Mr. Howard Drew  
Vice President, Site Manager  
Wood Cellulose Manufacturing  
One Buckeye Drive  
Perry, FL 32348  
Taylor County

For:

Buckeye Florida, L.P.  
One Buckeye Drive  
Perry, FL 32348  
Taylor County

1. RESPONSE TO PUBLIC COMMENTS

A Notice of Draft Permit, Administrative Order (AO) and Alternative Dissolved Oxygen Criterion (ADOC) for the subject facility was issued on August 17, 2005. The notice was published in a local newspaper of general circulation on August 19, 2005. A formal public meeting was held in Perry, Florida on September 29, 2005, to receive public comments on the Draft Permit, AO and ADOC (the public comment period was extended through October 6, 2005). A copy of the draft permit, AO and ADOC were provided to EPA on August 17, 2005. The Environmental Protection Agency (EPA) submitted a letter, dated August 24, 2005, reserving review and approval of the Proposed Permit, AO and ADOC pending resolution of any Administrative Hearings on the project.

Public comments were received and reviewed by the Department. Please note that though each comment was reviewed individually, the Department's response combines

the comments received into general topics, which are discussed below. The public comments are displayed in italics.

- a. Public Comment: *The Big Bend area sea grass flats are unique in the world for their size and abundance of sea life. There is already a dead zone in the seagrasses at the Fenholloway River estuary. You will be causing even greater damage if you permit this pipeline of excessive pollutants to go directly to the Gulf.*

DEP Response: There is evidence that sea grasses are recovering in the Fenholloway near shore area of the Gulf of Mexico (Gulf) as a result of improvements in effluent quality Buckeye has made over the past several years. Buckeye has provided reasonable assurance that the color limit included in the permit will allow the restoration of sea grasses. Buckeye will submit for Department's review and approval, a plan to monitor the continued restoration of sea grasses in the Fenholloway near shore area of the Gulf. Please refer to permit condition VI.G for more details regarding the study on sea grasses.

- b. Public Comment: *Buckeye's effluent threatens the shellfish due to high levels of dioxin and several other pollutants.*

DEP Response: The Permit and Administrative Order will require Buckeye's effluent to meet Class III standards in the estuarine portion of the Lower Fenholloway and the Gulf near shore area. Buckeye has implemented elemental chlorine free bleaching technology that reduces the potential to generate dioxin. This facility is also required to annually assess the levels of 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD)/ 2,3,7,8-tetrachloro-dibenzo-p-furan (TCDF) in ambient fish tissue in the receiving waters of the Lower Fenholloway River Estuary and near shore area of the Gulf. In September 2003, the Department of Health lifted the fish advisory originally implemented in 1990 because of the decreased level of dioxin in the fish found in the Fenholloway River. Additional treatment enhancements will be implemented as a result of the permit and will further reduce the potential discharge of dioxin.

- c. Public Comment: *There are economically reasonable alternatives to improve effluent that should be required.*

DEP Response: The Department, EPA, Clean Water Network and Buckeye Florida worked together to develop proposed improvements to plant processes and the effluent. All available options were evaluated for economic and technical merit. The permit reflects findings from this effort as documented in the "Fenholloway River Evaluation Initiative Wastewater Treatment Workgroup Report" dated September 19, 2003 and "Report of the Process Technology Work Group" updated May 2003.

- d. Public Comment: *Please complete a groundwater/drinking water study.*

DEP Response: A study was completed in 1995 regarding the impact of

surface waters on the groundwater in the surrounding areas. The permanent solution implemented as a result of these findings was the extension of the public water main and connection of homeowners to this source. Groundwater monitoring is required throughout the life of the permit (see Part III of the permit). However, a review of current data indicates no change in the characteristics that would trigger an additional formal groundwater study. Also, restoration of the Fenholloway is required to be monitored by Buckeye. The Department expects groundwater quality will significantly improve as the Fenholloway River is restored to Class III standards and the discharge is relocated to the estuarine portion of the river.

- e. Public Comment: *The Fenholloway River is filled with contaminated sediments. The permit does not address this issue.*

DEP Response: The Department has no evidence that significant amounts of sediment exist at the bottom of the Fenholloway River. However, Buckeye is required by permit condition VII.J to monitor the biological integrity of the Fenholloway River.

2. CHANGES TO PERMIT FROM DRAFT PERMIT TO NOTICE OF INTENT TO ISSUE PERMIT STAGE:

Changes deemed as minor/typographical/cosmetic are not specifically addressed herein.

- a. For clarification of the toxicity language requirement, the formatting of Permit Section I.4 has been modified. The requirements of this section have remained consistent with the draft permit.
- b. Based on U.S. Fish and Wildlife Service's letter, dated October 31, 2005, raising concerns regarding the proposed discharge location becoming an artificial manatee refuge, a permit condition was added to Part I.E.9 and a Manatee Plan of Evaluation has been added to the permit in Part VI.2 and VII.K.