FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
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JACKSONVILLE, FLORIDA 32256

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Gilman Building Products
581705 White Oak Road
Yulee, Florida 32097

Authorized Representative:
Victor Garrett, President, Manufacturing

Air Permit No. 0190005-006-AC
Permit Expires: **January 16, 2016**

Maxville Mill
Air Construction Permit
Kiln No. 3 (EU004)

This is the final air construction permit, which authorizes the building of the No. 3 Direct-fired Lumber Drying Kiln (EU004). The proposed work will be conducted at the Maxville Mill, which is a Sawmill and Planing Mill (Standard Industrial Classification No. 2421). The facility is located in Clay County at US 301 and SR 218, South of Maxville, 6640 SR 218 E., Maxville, Clay County; UTM Coordinates: Zone 17, 400.9 km East and 3336.2 km North; and, Latitude: 30° 09' 17" North and Longitude: 82° 01' 44" West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G.
Program Administrator
Permitting Programs – Northeast District

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Air Construction Permit and all copies were sent before the close of business on January 16, 2015 to the listed persons.

Leslie Maybin
Clerk

January 16, 2015
Date

Victor H. Garrett, President, Manufacturing Operations - Gilman Building Products, (victorgarrett@gilmanbp.com)
Frank Darabi, P.E. - Darabi & Associates, (fdarabi@darabiassociates.com)
John Love, Mill Manager - Gilman Building Products, (johnlove@gilmanbp.com)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility consists of several pieces of equipment used to process wood into chips and lumber. Equipment includes: a log debarker, saw, chipper, sorter, planer, cyclones, drying kilns, and a hammer mill**.**

Facility ID No. 0190005	
ID No.	**Emission Unit Description**
002	No. 1 Direct-Fired Kiln with roof vents and waste wood fired burner (has an abort stack for heat release when it is not needed in the kiln) that exhaust directly into the kiln.
003	No. 2 Direct-Fired Kiln with roof vents and waste wood fired burner (has an abort stack for heat release when it is not needed in the kiln) that exhaust directly into the kiln.

Proposed Project

Air Construction Permit which authorizes the building of the No. 3 Direct-fired Lumber Drying Kiln (EU004). This project will add the following emissions units.

Facility ID No. 0190005	
ID No.	**Emission Unit Description**
004	No. 3 Direct-fired Lumber Drying Kiln. Manufacturer- Kiln Drying Systems & Components, Inc. Double Track unit.

FACILITY REGULATORY CLASSIFICATION

- The facility **is** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

Current VOC facility-wide emissions are 228 TPY + 171 TPY for this project = 399 Total VOC TPY. After this permitting project, this source will be considered a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

This project will make the facility a major source of Individual hazardous air pollutants (HAP) for H095 Formaldehyde. Prior Total was 6.18 TPY + 4.6 TPY from the new Kiln No. 4 = 10.78 TPY Total.

This project will make the facility a major source of Individual hazardous air pollutants (HAP) for H115 Methanol. Prior Total was 9.6 TPY + 7.2 TPY from the new Kiln No. 4 = 16.8 TPY Total.

Total Facility-wide HAPS: 10.78 TPY + 16.8 TPY = 27.58 TPY Total HAPS.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management Program. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number 904) 256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements.

   e. Appendix DDDD. NESHAP 40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products;

   f. Appendix GP. NESHAP 40 CFR 63, Subpart A General Provisions.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, and Chapter 62-213, F.A.C.]

A. EU004 No. 3 Direct-fired Lumber Drying Kiln

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
004	No. 3 Direct-fired Lumber Drying Kiln Manufacturer- Kiln Drying Systems & Components, Inc. Double Track unit. Double Track unit, typical design parameters for the kiln include 20 roof exhaust vents (22 inch x 22 inch square). The nominal kiln dimensions are 34 feet (ft) in width, and 85 ft in length.

{PERMITTING NOTE(S): This emissions unit is subject to the requirements of Rule 62-296.410(2)(b), F.A.C.- Carbonaceous Fuel Burning Equipment, and 40 CFR 63, Subpart DDDD– National Emission Standards For Hazardous Air Pollutants: Plywood And Composite Wood Products}

PROPOSED CONSTRUCTION WORK

1. The permittee is authorized to install a new direct-fired lumber drying kiln. Miscellaneous equipment may include foundations electrical work, controllers, fans, baffles, shrouds, ductwork, motor control center, new lumber carts, etc., as necessary.

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2. **Commencement of Construction.** The permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction on **EU004**. This notification shall be submitted or postmarked within as many days prior to the date of construction as practical, but no later than thirty (30) business day following commencement of construction and operation.

[Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

3. **Permitted Capacity**. The maximum drying rate of the kiln shall not exceed 90,000 million board-feet per 12-month rolling period (90 MBF/yr).

[Application No. 0190005-006-AC, and 62-210.200(PTE), F.A.C]

4. **Heat Input Capacity.** The heat input rate of the burner shall not exceed 40 MMBTU/HR.

[Rule 62-210.200(PTE), F.A.C., and Application No. 0190005-006-AC]

5. **Hours of Operation.** This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C., and Application No. 0190005-006-AC]

6. **Methods of Operation**. Waste wood shall be the only fuel fired in this emissions unit.

[Application No. 0190005-006-AC]

NESHAP APPLICABILITY.

7. **Subpart DDDD.** This emission unit is subject NESHAP 40 CFR 63, Subpart DDDD – Plywood and Composite Wood Products. **However, the kiln is not required to comply with any compliance/operating requirement, and the work practice standards, except for the initial notification** as required in 40 CFR 63.9(b). The permittee is required to submit initial notification no later than 120 calendar days after initial startup.

   [NESHAP 40 CFR 63.9(b)]

EMISSIONS STANDARDS

8. **Visible Emissions (VE).** Visible Emissions from the kiln vents shall not exceed 30 percent opacity except that visible emissions not exceeding 33 percent opacity shall be allowed for one six-minute period in any one-hour period.

   [Rule 62-296.410(2)(b)1., F.A.C., and Application No. 0190005-006-AC]

9. **Particulate Matter**. Particulate Matter – shall not exceed 0.2 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel.

   [Rule 62-296.410(2)(b)2., F.A.C., and Application No. 0190005-006-AC]

TESTING REQUIREMENTS

10. **Initial Compliance VE Tests**. Representative kiln vents shall be tested to demonstrate initial compliance with the VE emissions standard specified in **Specific Condition 8** of this subsection. The initial test shall be conducted within 180 days after initial operation.

    [Rules 62-296.410(3)(a) and 62-4.070, F.A.C. Reasonable Assurance]

11. **PM Compliance Tests**. Compliance with the PM limit shall be demonstrated by the kiln enclosure; low velocity exhaust gas released to the atmosphere from the kiln vents; and meeting the visible emissions (VE) limit specified in **Specific Condition 8** of this section.

    [Rule 62-296.410(3)(b), F.A.C, – Carbonaceous Fuel Burning Equipment]

12. **Annual Compliance VE Tests**. During each federal fiscal year (October 1st to September 30th), representative kiln vents shall be tested to demonstrate compliance with the emissions standards for Visible Emissions limit specified in **Specific Condition 8** of this section.

    [Rule 62-297.310(7)(a)4, F.A.C.]

13. **Test Requirements**. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

    [Rule 62-297.310(7)(a)9, F.A.C.]

14. **Test Methods and Procedures**. All emissions tests performed pursuant to the requirements of Rule 62-296.410(3)(b), F.A.C., shall comply with the following requirements.

(a) The test method for visible emissions shall be EPA Method 9, as described at 40 C.F.R. Part 60, Appendix A-4, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

15. **Opacity Compliance Testing.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. If the operation is normally completed in less than 30 minutes and does not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

[Rule 62-297.310(4)(a)2., F.A.C.

RECORDS AND REPORTS

16. **Test Reports**. The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in attached Combined Appendices - Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the throughput rate.

[Rule 62-297.310(8), F.A.C.]

17. **Processing Records**. Within at least 10 days following each calendar month, the permittee shall record the following information in a written log:

a. The amount of wood dried in the kiln (board-feet) for the previous calendar month; and

b. The amount of wood dried in the kiln (board-feet) for the previous 12 calendar months of operation.

The records shall be maintained in a written (or electronic) log available for inspection by the Compliance Authority.

[Rule 62-4.070, F.A.C. Reasonable Assurance]

18. **Annual Operating Reports**. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year to summarize operation for the previous calendar year.

{Permitting Note: The permittee should use the best available data for reporting emissions from the kiln. Based on currently available data, the VOC emission factor for the kilns is 3.8 lb VOC/1000 board-feet. This rate is based on the submitted application}

[Rule 62-210.370(3), F.A.C.]

19. This Facility is subject to SECTION 2. Administrative Requirements of this permit and also, the attached Combined Appendices.