FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

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GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Suwannee Lumber Company LLC
40 SW 10th Street
Cross City, Florida 32628

Air Permit No. 0290004-014-AC
Permit Expires: April 30, 2014

Authorized Representative:
Daniel Dickert, President

Cross City Mill
Air Construction Permit
Kiln No. 3 Extension

This is the final air construction permit, which authorizes the extension of Kiln No. 3 in order to allow continuous feed from both sides of the kiln. The proposed work will be conducted at the Cross City Plant, which is a lumber processing facility (Standard Industrial Classification No. 2421). The facility is located in Dixie County at 40 SW 10th Street, Cross City, Florida. The UTM coordinates are Zone 17, 291.8 km East, and 3280.7 km North. As noted in the Final Determination provided with this final permit, only minor changes, clarifications, and a name change were made to the draft permit.

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
Waste and Air Resource Management Program

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on August 6, 2013 to the persons listed below.

Daniel Dickert, President- Suwannee Lumber Company LLC(ddic415538@aol.com)
Frank Darabi, P.E. of Record, Darabi Associates, Inc. (fdarabi@darabiassociates.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ August 6, 2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Suwannee Lumber Company LLC operates a lumber wood processing facility (SIC code 2421).

Proposed Project

Extension of Kiln No. 3 in order to allow continuous raw lumber feed from both sides of the kiln. The project converts Lumber Drying Kiln No. 3 from a batch fired kiln to a continuous fired kiln. This project will modify the following emissions unit(s).

Facility ID No. 0290004	
ID No.	**Emission Unit Description**
004	No. 3 Direct-Fired Kiln

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.

Permit 0290004-012-AC restricted the annual lumber production for EU 002 and 003 (Lumber Drying Kiln Nos. 1 and 2 respectively) to 30 and 40 million board feet respectively. The purpose of this restriction was to insure that Prevention of Significant Deterioration (PSD) requirements (including BACT) did not apply to the modification of Lumber Drying Kiln No. 3. Upon further reevaluation of the modification of the Lumber Drying Kiln No. 3, as requested by the applicant, in this permitting action (Project 0290004-014-AC) it has been determined that processing of the modification of Lumber Drying Kiln No. 3 could have been accomplished without Lumber Drying Kiln Nos. 1 and 2 being affected units and thereby having restrictions placed upon them as to a maximum quantity of lumber dried per year (12 month rolling total). Therefore the annual restriction on board feet of dried lumber placed upon the Lumber Drying Kiln Nos. 1 and 2 is rescinded. Lumber Drying Kiln Nos. 1 and 2 may operate under current physical configuration and operational methods at maximum unrestricted capacity.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority & Compliance: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address and phone number are 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, 904-256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. 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.

3. 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.

4. 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.]

5. 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.]

6. 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.]

7. 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. **Note: Fulfilled by Title V Air Operating permit application received by the NED office May 30, 2013.** 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, 62-4.220 and Chapter 62-213, F.A.C.]

8. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the project and that is emitted by any emissions unit and activity that could be affected (including but not limited to the emissions from the No. 3 Lumber Drying Kiln, emissions from the No. 3 Lumber Drying Kiln burner, emissions from the associated sawing and planing systems); and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period **of 10 years following resumption of regular operations after the change**. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during **the 10-year period** setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      1) The name, address and telephone number of the owner or operator of the major stationary source;
      2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
      3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
      4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   For this project, the Department requires the annual reporting of actual VOC, CO, PM, PM_{10}, $PM_{2.5}$, and NOx emissions for the following unit(s): Emission Unit 004 (No. 3 Lumber Drying Kiln, including emissions from the associated sawing and planing systems).

   [Application Nos. 0290004-012-AC and 0290004-014-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
004	No. 3 Direct-Fired Kiln.

This emissions unit is subject to the requirements of Rule 62-296.410(2)(a), F.A.C.- Carbonaceous Fuel Burning Equipment. The unit is an affected source of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: 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).

EQUIPMENT

1. **Relation to Other Permits.** The conditions of this permit will replace all conditions of existing permit 0290004-012-AC.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

2. **Equipment Change.** No. 3 Direct-Fired Kiln: The permittee is authorized to extend the No. 3 Direct-Fired Lumber Drying Kiln. The project converts Lumber Drying Kiln No. 3 from a batch fired kiln to a continuous fired kiln.

[Application Nos. 0290004-012-AC and 0290004-014-AC]

PERFORMANCE RESTRICTIONS

3. **This project will change the Permitted Capacity- Throughput Rate as follows:**

EU004 No. 3 Direct-Fired Kiln Permitted Capacity- Throughput Rate. The maximum annual (12 month rolling average) process rate shall not exceed 80,000 Mbf (80 million board feet of lumber). This capacity shall include any logs or plywood that may be dried.

[Application Nos. 0290004-012-AC and 0290004-014-AC; Rule 62-210.200(PTE), F.A.C., Avoid PSD applicability]

4. **Permitted Fuel Capacity Rate as follows:**

EU004 Permitted Capacity – Burner Heat Input. The maximum heat input rate of the burner shall not exceed 29.5 MMBtu/hr (Basis: 7633 lb/hr, 3825 Btu/lb).

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.; and Application Nos. 0290004-012-AC and 0290004-014-AC]

5. **Hours of Operation**. The hours of operation of are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

6. **Methods of Operation- Fuel(s).** Sawdust shall be the primary fuel fired in the Kilns. Propane gas shall be fired as a pilot fuel only.

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

EMISSIONS STANDARDS

7. **EU 004 Visible Emissions.** This permit does not change any or establish any new visible emissions limitations for this EU: Visible emissions shall not exceed 20 percent opacity except that 40 percent opacity is permissible for not more than 2 minutes in any one hour.

[Rule 62.296.410(2)(a), F.A.C.]

TESTING REQUIREMENTS

8. **EU004 Initial Compliance Test**. Emissions unit 004 shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. The initial tests shall be conducted prior to applying for an operating permit. **Note: Fulfilled by VE test conducted on March 28, 2013.**

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

9. **Annual Compliance Tests.** During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions.

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

10. **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.]

11. **Test Methods.** This permit does not change any or establish any new permitting test methods for this EU: The Visible Emissions test method shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations (specified in Subsection D). The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

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

12. DEP Method 9. This permit does not change any or establish any new permitting test methods for this EU: The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 per cent opacity, except that an opacity of 40 per cent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity (the opacity shall be determined as specified above for single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401(9)(c) F.A.C.]

13. DEP Method 9- Required Sampling Time. This permit does not change any or establish any new permitting sampling times for this EU: The required minimum period of observation for each compliance test shall be sixty (60) minutes or, if the operation is normally completed in less than 60 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. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rules 62-297.310(4)(a)2 and (4)(a)2.a., F.A.C.]

RECORDS AND REPORTS

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