Suwannee Lumber Company LLC

Cross City Plant

Facility ID No. 0290004

Dixie County

Title V Air Operation Permit Renewal

Permit No. 0290004-015-AV

(Renewal of Title V Air Operation Permit No. 0290004-011-AV)

Permitting & Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Northeast District

8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Telephone: (904) 256-1700
Fax: (904) 256-1590

Title V Air Operation Permit Renewal

Permit No. 0290004-015-AV

Table of Contents

Section **Page Number**

I. Facility Information.
- A. Facility Description. 2
- B. Summary of Emissions Units. 2
- C. Applicable Regulations. 3

II. Facility-wide Conditions. 5

III. Emissions Units and Conditions.
- A. Kiln No. 1 8
- B. Kiln No. 2 12
- C. Kiln No. 3 16

IV. Appendices..... 20
- Appendix A, Glossary.
- Appendix I, List of Insignificant Emissions Units and/or Activities.
- Appendix U, List of Unregulated Emissions Units and/or Activities.
- Appendix RR, Facility-wide Reporting Requirements.
- Appendix TR, Facility-wide Testing Requirements.
- Appendix TV, Title V General Conditions.

Referenced Attachments. ..... At End
- Table H, Permit History.
- Table 1, Summary of Air Pollutant Standards and Terms.
- Table 2, Compliance Requirements.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

RICK SCOTT
GOVERNOR

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

HERSCHEL T. VINYARD JR.
SECRETARY

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

Permit No. 0290004-015-AV
Facility ID No.: 0290004

SIC No(s).: 2421
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the above referenced facility. This project also incorporates the terms and conditions of Construction Permit No. 0290004-014-AC. The existing facility is located in Dixie County at SW of US 19 on Highway 351-A, West of Cross City, Cross City; UTM Coordinates: Zone 17, 291.8 km East and 3280.7 km North; and, Latitude: 29° 37' 55" North and Longitude: 83° 08' 38" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date:	October 14, 2013
Renewal Application Due Date:	March 3, 2018
Expiration Date:	October 14, 2018

_____

Richard S. Rachal III, P.G.,
Program Administrator
Waste and Air Resource Management Program

RSR/rfs

Subsection A. Facility Description.

Suwannee Lumber Company LLC operates a lumber wood processing facility (SIC code 2421) that converts softwood logs (Southern Yellow Pine), into dried and dimensioned lumber. It consists of three main processes: the Sawmill, three direct-fired drying kilns (Emissions Unit Nos. 002, 003, and 004), and the Planer Mill.

Incoming logs to the facility are stored in the log yard until they are ready to be processed. The whole logs are routed to the debarker area where the bark is stripped from the logs. The removed bark is conveyed to the Bark Storage for trucking off-site as product.

The debarked logs are transferred to the Sawmill where they are cut into rough dimensional lumber using chipping heads and band saws. The chips and sawdust generated are collected and conveyed to the Green Chip Storage for sale as product.

The handling and transfer of green sawdust/chip/bark for use and sale off-site is not subject to any specific regulatory requirement. This activity is included in the Insignificant Activities List of this Permit.

From the Sawmill, the lumber is routed to the stacker where it is sorted and then temporarily stored before being transferred to the drying kilns for drying. Green lumber is stacked on carts inside of the drying kilns. The drying of the lumber is accomplished by wood-fueled burners in each of the kilns. The heated air inside the kiln is circulated by fans during each drying cycle over the green lumber stacked inside. Gases from the drying kilns (products of the combustion from the kiln burner, HAPs, and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. The vents are utilized to control the temperature and moisture content of the air within the kiln. Gases also escape as fugitive emissions through kiln doors and other exit points created after the kiln has undergone multiple heating and cooling cycles.

Dried lumber is transferred to the Planer Mill where the lumber is finished by trimming and planning. Shavings from the planer are captured and pneumatically conveyed to a cyclone where they are either transferred to the storage silo to be used as fuel for the kiln burners, or conveyed to a shaving storage silo for sale as product.

The finished lumber is conveyed to a grader where the lumber is separated based on quality. It is then stacked, packaged, and either stored or shipped for sale as product.

The wood preserving operation ceased in April 2011. The Department accepted the closure certification on September 14, 2011. The activity is removed from the Insignificant Activities List of this Permit.

Subsection B. Summary of Emissions Units.

EU 002: No. 1 Direct -Fired Lumber Dry Kiln. This kiln was installed in 1994. From the applicant supplied data dated July 2, 2013, the maximum heat input rate for the burner is estimated to be 25.0 MMBtu/hr, and the kiln dimensions are 32' w x 54'l x 15'6" dh.

There are a total of 16 kiln vents (8 on each side). Four kiln vents (2 on each side) act as safety vents and open to control pressure inside the kiln. The other 12 kiln vents regulate the temperature and humidity in the kiln and open for short periods of time.

From the July 2, 2013 data, the capacity of the kiln is estimated as 99,533 board feet per charge. This is based on a 96 percent stacking efficiency, that kilns will actually hold their length in wood based on doors being outside their column centers, the assumption that there are 60 layers in a pack, and the packs are eight feet wide and each layer is filled.

As stated in Construction Permit No. 0290004-014-AC, the maximum annual production rate is unrestricted based on the kiln's current configuration and operating methods.

The kiln is subject to the requirements of State Rule 62-296.410(2)(a), F.A.C.– Carbonaceous Fuel Burning Equipment.

This emission unit also includes the pneumatic conveyance system to transfer shavings from the Planer Mil to the Shavings Storage Silo, and the cyclone. The cyclone is classified as an unregulated emissions unit. However, it is subject to the facility-wide visible emissions standard (less than 20% opacity) in accordance with Rule 62-296.320(4)(b)1., F.A.C.

EU 003: No. 2 Direct Fired Lumber Dry Kiln. This kiln was installed in 1999. From the applicant supplied data dated July 2, 2013, the maximum heat input rate for the burner is estimated to be 25.0 MMBtu/hr, and the kiln dimensions are '32' w x 68'l x 15'6" dh.

There are a total of 16 kiln vents (8 on each side). Four kiln vents (2 on each side) act as safety vents and open to control pressure inside the kiln. The other 12 kiln vents regulate the temperature and humidity in the kiln and open for short periods of time.

From the July 2, 2013 data, the capacity of the kiln is estimated as 125,338 board feet per charge. This is based on a 96 percent stacking efficiency, that kilns will actually hold their length in wood based on doors being outside their column centers, the assumption that there are 60 layers in a pack, and the packs are eight feet wide and each layer is filled.

As stated in Construction Permit No. 0290004-014-AC, the maximum annual production rate is unrestricted based on the kiln's current configuration and operating methods.

The kiln is subject to the requirements of State Rule 62-296.410(2)(a), F.A.C.– Carbonaceous Fuel Burning Equipment.

EU 004: No. 3 Direct-Fired Lumber Dry Kiln. This kiln was installed in 2004. From the applicant supplied data dated July 2, 2013, the maximum heat input rate for the burner is estimated to be 29.5 MMBtu/hr, and the kiln dimensions are '32' w x 84'l x 15'6" dh, with two equalizing chambers on either end of the kiln that are approximately 61 feet in length each.

The kiln was extended to allow continuous raw lumber feed from both sides of the kiln under Construction Permit No. 0290004-014-AC.

From the applicant supplied data dated July 2, 2013, the capacity of the kiln is estimated as 249,600 board feet per 24-hour period. This is based on a 3,200 board feet pack, a height of 4 packs, 800 board feet per foot, a push rate of 6.5 feet per hour, and 2 tracks.

The kiln is limited to a maximum annual (12-month rolling average) process rate of 80 million board feet of lumber. This production rate limitation was put in place by the applicant to avoid the requirements of Rules 62-212.400(4) through (12), F.A.C. for several pollutants.

The kiln is subject to the requirements of State Rule 62-296.410(2)(a), F.A.C.– Carbonaceous Fuel Burning Equipment., and Rule 62-212.400(12), F.A.C.- Source Obligation.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received May 30, 2013, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations: 62-4, 62-204, 62-212.300, 62-213, 62-296.320, 62-297.310	002, 003, 004
State Rule Citation: 62-210.300,	004
Federal Rule Citation: 40 CFR 63 Subpart DDDD- National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	002, 003, 004
40 CFR 63, Subpart A – General Provisions	002, 003, 004

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.

[Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.; Construction Permit No. 0290004-009-AC]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

Nothing was deemed necessary and ordered at this time.

[Rule 62-296.320(1), F.A.C.]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.

[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

The following requirements are "not federally enforceable":

a. Paving and maintenance of roads, parking areas and yards.
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.

Condition FW5. Continued:

d. Removal of particulate matter from roads and other paved areas under the control of the permittee of the emissions unit to prevent re-entrainment, and from buildings or work areas to prevent particulate matter from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c)3, F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. 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.

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

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.

[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.

[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Actual Emissions Reporting

FW10. Actual Emissions Reporting: Permit No. 0290004-014-AC 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.[NOTE] 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.

   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).

[NOTE] *The change authorized by Construction Permit No. 0290004-014-AC occurred in 2012. As such, the first year of reporting covers calendar year 2013. The first report is due on or before March 1, 2014. The last year of reporting covers calendar year 2022.*

[Construction Permit No. 0290004-014-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

The Conditions in this subsection apply to the following emissions unit:

E.U. ID No.	Brief Description
-002	No. 1 Direct Fired Lumber Dry Kiln. The kiln is a batch fired kiln. The kiln is manufactured by USNR and installed in 1994. Kiln dimensions are 32' w x 54'l x 15'6" dh. The drying of the lumber is accomplished by wood-fueled burner in the kiln. The heated air inside the kiln is circulated by fans during each drying cycle over the green lumber stacked inside. Gases from the drying kiln (products of the combustion from the kiln burner, HAPs, and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after the kiln has undergone multiple heating and cooling cycles.

{Permitting note(s): 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 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).}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity.

a. Kiln Burner Heat Input: The maximum heat input rate of the burner is estimated to be no more than 25.0 MMBtu/hr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

b. Kiln Process Rate. The maximum annual (12 month rolling average) process rate of this kiln, in its current physical configuration and operational methods, is of an unrestricted capacity. This capacity shall include any logs or plywood that may be dried.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-014-AC]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.3. Methods of Operation- Fuels. Sawdust shall be the primary fuel fired in the kiln. Propane gas shall be fired as a pilot fuel only.

[Permit No. 0290004-004-AF; Rule 62-4.070, F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

A.4. Visible Emissions**.** 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.; Permit No. 0290004-004-AF]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

A.5. Excess Emissions – Allowed**.** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.6. Excess Emissions -Prohibited. Excess Emissions which are cause entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.7. Visible Emissions. Visible Emissions. The Visible Emissions test method shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. No other methods may be used unless prior written approval is received from the Department.

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.

A compliance test shall be conducted on an annual basis, at least once each federal fiscal year (October 1 – September 30).

[Rules 62-296.410(3)(a), 62-297.310(7)(a)4.a., and 62-297.320, F.A.C.]

A.8. DEP Method 9. 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.; and Appendix A of 40 CFR 60; Rule 62-297.401(9)(c) F.A.C]

A.9. DEP Method 9- Required Sampling Time. 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.]

A.10. Compliance Test Procedures. Compliance test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.410(3)(c), F.A.C.]

A.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

A.12. Throughput Rate. The throughput rate in Mbf of lumber (including any logs or plywood that may be dried for the wood preserving operation), dried per month for each 12-consecutive month. These records shall be retained for five years.

[Air Permit 0290004-004-AF; Rule 62-4.070, F.A.C.; Application Information dated May 9, 2008]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-003	No. 2 Direct Fired Lumber Dry Kiln. The kiln is a batch fired kiln. The kiln is manufactured by USNR and installed in 1999. Kiln dimensions are 32' w x 68'l x 15'6" dh. The drying of the lumber is accomplished by wood-fueled burner in the kiln. The heated air inside the kiln is circulated by fans during each drying cycle over the green lumber stacked inside. Gases from the drying kiln (products of the combustion from the kiln burner, HAPs, and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after the kiln has undergone multiple heating and cooling cycles.

{Permitting note(s): 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 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 following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity.

a. Kiln Burner Heat Input: The maximum heat input rate of the burner shall not exceed 25.0 MMBtu/hr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-005-AC]

b. Kiln Process Rate. The maximum annual (12 month rolling average) process rate of this kiln, in its current physical configuration and operational methods, is of an unrestricted capacity. This capacity shall include any logs or plywood that may be dried.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-014-AC]

B.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.3. Methods of Operation. Fuels. Sawdust shall be the primary fuel fired in the kiln. Propane gas shall be fired as a pilot fuel only.

[Permit No. 0290004-004-AF; Rule 62-4.070, F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

B.4. Visible Emissions**.** 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.; Permit No. 0290004-004-AF]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

B.5. Excess Emissions – Allowed**.** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.6. Excess Emissions -Prohibited. Excess Emissions which are cause entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.7. Visible Emissions. The Visible Emissions test method shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. No other methods may be used unless prior written approval is received from the Department.

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.

A compliance test shall be conducted on an annual basis, at least once each federal fiscal year (October 1 – September 30).

[Rules 62-296.410(3)(a), 62-297.310(7)(a)4.a., and 62-297.320, F.A.C.]

B.8. DEP Method 9. 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.; and Appendix A of 40 CFR 60; Rule 62-297.401(9)(c) F.A.C.]

B.9. DEP Method 9- Required Sampling Time. 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.]

B.10. Compliance Test Procedures. Compliance test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.410(3)(c), F.A.C.]

B.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

B.12. Throughput Rate. The throughput rate in Mbf of lumber (including any logs or plywood that may be dried for the wood preserving operation), dried per month for each 12-consecutive month. These records shall be retained for five years.

[Air Permit 0290004-004-AF; Rule 62-4.070, F.A.C.; Application Information dated May 9, 2008]

Subsection C. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-004	No. 3 Direct Fired Lumber Dry Kiln. The kiln is a continuous fired kiln in that raw lumber is continuously fed from both sides of the kiln. The kiln is manufactured by USNR, Model No. DT.HT.DF.DK84 and installed in 2004. Kiln dimensions are 32' w x 84'l x 15'6" dh, with two equalizing chambers on either side of the kiln that are approximately 61 feet in length each. The drying of the lumber is accomplished by wood-fueled burner in the kiln. The heated air inside the kiln is circulated by fans during each drying cycle over the green lumber stacked inside. Gases from the drying kiln (products of the combustion from the kiln burner, HAPs, and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after the kiln has undergone multiple heating and cooling cycles.

{Permitting note(s): 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 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 following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity.

a. Kiln Burner Heat Input: The maximum heat input rate at the burner shall not exceed 29.5 MMBtu/hr.

[Rules 62-4.160(2) & (14)(b) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-014-AC]

b. Kiln Process 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.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-014-AC, PSD Avoidance]

C.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0290004-014-AC]

C.3. Methods of Operation. Fuels. Carbonaceous (wood waste, sawdust) fuel shall be the primary fuel fired in the kiln. Propane gas shall be fired as a pilot fuel only.

[Rule 62-210.200(55), F.A.C.; Construction Permit No. 0290004-009-AC; Construction Permit No. 0290004-014-AC]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

C.4. Visible Emissions**.** 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.; Construction Permit No. 0290004-009-AC; Construction Permit No. 0290004-014-AC]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

C.5. Excess Emissions – Allowed**.** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

C.6. Excess Emissions -Prohibited. Excess Emissions which are cause entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.7. Visible Emissions. The Visible Emissions test method shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. No other methods may be used unless prior written approval is received from the Department.

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.

A compliance test shall be conducted on an annual basis, at least once each federal fiscal year (October 1 – September 30).

[Rules 62-296.410(3)(a), 62-297.310(7)(a)4.a., and 62-297.320, F.A.C.; Construction Permit No. 0290004-014-AC]

C.8. DEP Method 9. 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

Condition C.8. Continued:

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.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60; Rule 62-297.401(9)(c) F.A.C.; Construction Permit No. 0290004-014-AC]

C.9. DEP Method 9- Required Sampling Time. 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.; Construction Permit No. 0290004-014-AC]

C.10. Compliance Test Procedures. Compliance test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.410(3)(c), F.A.C.]

C.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

C.12. The owner or operator shall maintain records for:

(a) The amount of sawdust burned in tons per month for each 12-consecutive month. These records shall be retained for five years.

(b) The throughput rate in Mbf of lumber (including any logs or plywood that may be dried for the wood preserving operation), dried per month for each 12-consecutive month. These records shall be retained for five years.

[Construction Permit No. 0290004-009-AC; Application Information dated May 9, 2008]

C.13. Actual Emissions Reporting: The permittee is subject to monitoring, reporting and recordkeeping provisions as stated in Condition FW10.

[Construction Permit No. 0290004-014-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]