Florida Department of Environmental Protection

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DRAFT

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PERMITTEE

Green Circle Bio Energy, Inc.
2500 Green Circle Parkway
Cottondale, Florida 32431

Authorized Representative:
Greg Martin, Vice President of Manufacturing

Air Permit No. 0630058-016-AC
Permit Expires: November 7, 2016

Cottondale Wood Pellet Plant
Title V Air Construction Permit
Modification to 014-AC

This is the final air construction permit, which revokes the authorization to construct a third dryer; updates specific conditions from 40 CFR 60 subpart Db to the two existing dryer lines (emissions unit (EU) 002 and 003); and revises the frequency of compliance testing. The proposed project will be conducted at the Cottondale Wood Pellet Plant, which is a wood fuel pellet manufacturing facility, Standard Industrial Classification (SIC) No. 2499, Wood Products, Not Elsewhere Classified. The facility is located in Jackson County at 2500 Green Circle Parkway in Cottondale, Florida. The UTM coordinates are Zone 16, 653.9 km East, and 3401.7 km North, Latitude: 30° 44' 17" North and Longitude: 85° 23' 33" West. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) 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, 62-213, 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 Pensacola, Florida

(DRAFT)

_____ _____

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

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 _____ to the persons listed below.

Mr. Greg Martin, Vice President of Manufacturing, Green Circle Bio Energy, Inc., gmartin@greencirclebio.com
Mr. Scott McCann, P.E., Golder Associates, Inc., scott_mccann@golder.com
Tracy White, DEP Northwest District Branch Office, Panama City, tracy.a.white@dep.state.fl.us

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

(DRAFT)

_____ _____

Clerk Date

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a wood fuel pellet manufacturing facility, comprised of a wood fiber receiving and storage area, two dryer lines, three pelleting lines and a pellet load-out area. A pelleting line consists of hammer mills, pellet mills and a pellet cooler cyclone. The hammer mills and pellet mills have aspiration systems to remove PM emissions. The VOC and PM emissions from hammer mill lines (including the existing horizontal hammer mill) and pellet mill lines aspiration systems have recently been vented to the dryer furnaces which are controlled by wet electrostatic precipitators (WESPs) and regenerative thermal oxidizers (RTOs).

Logs are debarked and milled into chips. The chips are dried, ground and screened to a more consistent size. The ground wood is compressed to make wood pellets to be used as fuel. The finished pellets are loaded into railcars for shipment to customers.

Construction Permit 0630058-011-AC authorized an increase in the hourly and annual wood pellet production rates to 121 tons per hour and 827,000 tons per year; installation of a green Chip Screening and Sizing Operation; a new dryer line, a dry chip silo, up to ten new horizontal hammermills, three new pellet mills and new pneumatic transfer systems. The new silo for storage of dry chips and a new pellet mill on Pellet Mill Line No. 3 has been installed.

Permit 0630058-014-AC authorized the routing of the hammer mill and pellet mill aspiration systems' exhausts to the Dryer Line Furnaces (90% VOC destruction efficiency) and then to the WESPs (97% PM removal efficiency) and finally to the RTOs (95% VOC destruction efficiency.) The proposed 10 new horizontal hammer mills were not installed and were removed from the permit with Permit 0630058-014-AC.

The existing facility consists of the following emissions units.

Facility I.D. No. 0630058

I.D. No.	Emission Unit Description
Regulated Emissions Units	
001	Wood Fiber Receiving and Storage Area
002	Dryer Line 1
003	Dryer Line 2
004	Pelleting Line 1
005	Pelleting Line 2
006	Pelleting Line 3
007	Bulk Load-out Area
010	Emergency fire pump engine, CI RICE
Unregulated Emissions Units	
008	Diesel Fuel Storage Tank

Proposed Project

This project was submitted to modify Permit 0630058-014-AC to address the results of the hourly VOC emissions measured during the compliance tests conducted in April of 2014 for the two RTOs (regenerative thermal oxidizer) servicing the dryers. According to Application No. 0630058-016-AC, the third dryer that was authorized with construction permit 0630058-011-AC will not be constructed and the authorization to construct the third dryer is being revoked in this permit.

This construction permit also updates specific conditions from 40 CFR 60 subpart Db to the two existing dryer lines (emissions unit (EU) 002 and 003); and revises the frequency of compliance testing.

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.

1. Permitting Authority: The permitting authority for this project is the Northwest District Waste Management/Air Resources Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office at the above address or epost_nwdwasteair@dep.state.fl.us.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.

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.
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. NSPS subpart A
   f. Appendix F. NSPS subpart Db.
   g. Appendix G NSPS subpart IIII.
   h. Time Sensitive Action Chart.

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, 62-296 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. Asbestos: This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. 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.]

7. Modifications: The permittee shall notify the Permitting and Compliance Authority upon commencement of construction. Notification may be submitted by electronic mail to nwdair@dep.state.fl.us and copied to the permitting authority at epost_nwdwasteair@dep.state.fl.us. 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.]

8. 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.]

A. Dryer Line 1 and 2

This section of the permit addresses the following emissions unit(s).

I.D. No.	Emissions Unit Description
002	Dryer Line 1
003	Dryer Line 2

The dryer lines combustor's monitored parameters of wood chip feed screw sets revolutions per hour and combustor hydraulic ram feeder strokes per hour are being removed with this permit at the facility's request. This is because the pellet production testing rate for the Pelleting Lines (121 tons pellets per hour, on a 4-hour average basis), can be used as an indicator of maximum operating rate for the dryer lines.

The particulate matter (PM) limit was also changed in this permit as explained in the permitting note below.

Applicable NSPS subpart Db requirements have been updated as specific conditions to this construction permit and the revision that is being concurrently processed with this permit. These requirements include a CEMS, COMS, or ESP predictive model for compliance. The facility will need to choose the method of compliance and submit a site-specific monitoring plan for approval by the permitting authority (if complying by ESP predictive model), and an updated Compliance Monitoring Plan (CMP) including a Compliance Assurance Monitoring (CAM) Plan within 180 days of the issuance of this permit. The CEMS, COMS, or ESP model must be installed and operating within 270 days of the issuance of the permit.

SPECIFIC CONDITIONS

1. Previous Permits. This permit supplements all previously issued air construction and operation permits for this emissions unit(s). Except for the change noted below, the unit remains subject to the conditions of all other valid air construction and operations permits. [Rule 62-4.070(3), F.A.C.]

2. Permitted Capacity. The maximum operation capacity limit for each Dryer Line combustor is hereby removed. For testing purposes only, the combined hourly pellet production for the Pelleting Lines of 121 tons pellets per hour, measured at the Pellet Bulk Loadout, on a 4-hour average basis will be used as a maximum operating rate for the dryer lines' testing. [Rule 62-4.070(3), F.A.C., Application No. 0630058-016-AC]

3. Dryer Line 1 and 2 Combustors Wood Waste/Bark Feed Rate Factor Removed. The strokes per hour limit on each of the Dryer Line 1 and 2 Combustors hydraulic ram feeders is hereby removed. [Application No. 0630058-016-AC]

4. Dryer Line 1 and 2 Combustors Wood Waste/Bark Feed Rate Factor Recordkeeping Removed. Recordkeeping of the hydraulic ram feed strokes per hour on a daily average basis for each combustor is obsolete and is hereby removed. [Application No. 0630058-016-AC]

40 CFR 60 SUBPART DB REQUIREMENTS

EMISSIONS LIMITS

5. Opacity. The facility shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [40 CFR 60.43b(f)]

6. Particulate Matter. Particulate matter (PM) emissions from each Dryer Line shall not exceed 0.10 lb PM per MMBtu of carbonaceous fuel input except during periods of startup, shutdown, or malfunction. [Rule 62-4.070(3); 40 CFR 60.43b(g) and (h)(3); 40 CFR 60.46b(a); and Application No. 0630058-016-AC]

   {Permitting Note: 0630058-003-AC had a PM limit of 0.2 lb/MMBtu (from Rule 296.410(2)(b)2.) and 19.90 tons PM per 12 month rolling average for each Dryer Line 1 and Dryer Line 2 to avoid PSD review and as a limit for testing to verify manufactures guarantees for pollution control equipment (wet ESP and RTO). Permit 0630058-011-AC changed the limit to a more stringent 0.030 lb PM/MMBtu according to 40

CFR 60.43b(h)(1) (equivalent to 16.4 TPY at the 125 MMBTU/hr heat input capacity for each Dryer Line). This permit is changing the limit to 0.10 lb PM/MMBtu because 40 CFR 60.43b(h)(3) is an exception to 40 CFR 60.43b(h)(1) and is applicable to this 100% wood-burning emissions unit.}

7. Startup, Shutdown, or Malfunction. The PM and opacity standards apply at all times, except during periods of startup, shutdown, or malfunction. [40 CFR 60.43b(g) and 60.46b(a)]

COMPLIANCE TESTING AND MONITORING REQUIREMENTS

8. Testing Requirements. The owner or operator shall conduct subsequent performance tests of the Dryer Line 1 Exhaust Stack and Dryer Line 2 Exhaust Stack once during the Federal Fiscal year (October 1-September 30) prior to operating permit renewal, using the following procedures and reference methods:

   a. Method 3A or 3B of appendix A-2 of 40 CFR 60 is used for gas analysis when applying Method 5 of appendix A-3 of 40 CFR 60 or Method 17 of appendix A-6 of 40 CFR 60.

   b. Method 5 or 17 of appendix A of 40 CFR 60 shall be used to measure the concentration of PM as follows:

      i. Method 5 of appendix A shall be used at affected facilities without wet flue gas desulfurization (FGD) systems; and

      ii. Method 17 of appendix A-6 may be used at facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160 °C (320 °F).

   c. Method 1 of appendix A of this part is used to select the sampling site and the number of traverse sampling points. The sampling time for each run is at least 120 minutes and the minimum sampling volume is 1.7 dscm (60 dscf) except that smaller sampling times or volumes may be approved by the Administrator when necessitated by process variables or other factors.

   d. For Method 5, the temperature of the sample gas in the probe and filter holder is monitored and is maintained at 160±14 °C (320±25 °F).

   e. For determination of PM emissions, the oxygen (O_2) or CO_2 sample is obtained simultaneously with each run of Method 5 or 17 by traversing the duct at the same sampling location.

   f. For each run using Method 5 or 17, the emission rate expressed in ng/J heat input is determined using:

      i. The O_2 or CO_2 measurements and PM measurements obtained under this section;

      ii. The dry basis F factor; and

      iii. The dry basis emission rate calculation procedure contained in Method 19 of appendix A of 40 CFR 60.

   g. Method 9 of appendix A of 40 CFR 60 is used for determining the opacity of stack emissions.

   [Rules 62-4.070(3), 62-204.800, 62-296.410(3)(a)&(b), and 62-297.310(7)(a)4.; 40 CFR 60.46b(d) and Appendix A of 40 CFR 60]

9. PM Monitoring. Except as provided in paragraph (j) of 40 CFR 60.48b(a), the owner or operator shall install, calibrate, maintain, and operate continuous opacity monitoring systems (COMS) for measuring the opacity of emissions discharged to the atmosphere and record the output of the system. The owner or operator meeting the conditions under paragraphs (j)(1), (2), (3), (4), (5), or (6) of 40 CFR 60.48b who elects not to use a COMS, shall conduct a performance test using Method 9 and the procedures in 40 CFR 60.11 to demonstrate compliance with the applicable limit in 40 CFR 60.43b and shall comply with either paragraphs (a)(1), (a)(2), or (a)(3) of 40 CFR 60.48b (see a., b., and c. below, respectively). The observation period for Method 9 performance tests may be reduced from 3 hours to 60 minutes if all

6-minute averages are less than 10 percent and all individual 15-second observations are less than or equal to 20 percent during the initial 60 minutes of observation.

a. Method 9. Except as provided in paragraph (a)(2) and (a)(3) of 40 CFR 60.48b, the owner or operator shall conduct subsequent Method 9 performance tests using the procedures in paragraph (a) of 40 CFR 60.48b according to the following applicable schedule as determined by the most recent Method 9 performance test results:

   i. No observed VE. If no visible emissions are observed, a subsequent Method 9 performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted;

   ii. VE less than or equal to 5 percent. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5 percent, a subsequent Method 9 performance test must be completed within 6 calendar months from the date that the most recent performance test was conducted;

   iii. VE greater than 5 but less than 10 percent. If the maximum 6-minute average opacity is greater than 5 percent but less than or equal to 10 percent, a subsequent Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted;; or

   iv. VE greater than 10 percent. If the maximum 6-minute average opacity is greater than 10 percent, a subsequent Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.

b. Method 22. If the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 performance test, the owner or operator may, as an alternative to performing subsequent Method 9 performance tests, elect to perform subsequent monitoring using Method 22 of appendix A-7 of 40 CFR 60 according to the following procedures specified in paragraphs (a)(2)(i) and (ii) of 40 CFR 60.48b.

   i. The owner or operator shall conduct 10 minute observations (during normal operation) each operating day the affected facility fires fuel for which an opacity standard is applicable using Method 22 and demonstrate that the sum of the occurrences of any visible emissions is not in excess of 5 percent of the observation period (*i.e.*, 30 seconds per 10 minute period). If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial 10 minute observation, immediately conduct a 30 minute observation. If the sum of the occurrence of visible emissions is greater than 5 percent of the observation period (*i.e.*, 90 seconds per 30 minute period), the owner or operator shall either document and adjust the operation of the facility and demonstrate within 24 hours that the sum of the occurrence of visible emissions is equal to or less than 5 percent during a 30 minute observation (*i.e.*, 90 seconds) or conduct a new Method 9 performance test using the procedures in paragraph (a) of 40 CFR 60.48b within 45 calendar days according to the requirements in 40 CFR 60.46d(d)(7).

   ii. If no visible emissions are observed for 10 operating days during which an opacity standard is applicable, observations can be reduced to once every 7 operating days during which an opacity standard is applicable. If any visible emissions are observed, daily observations shall be resumed.

c. Alternative Digital Opacity Compliance System. If the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 performance test, the owner or operator may, as an alternative to performing subsequent Method 9 performance tests, elect to perform subsequent monitoring using a digital opacity compliance system according to a site-specific monitoring plan approved by the Administrator. The observations shall be similar, but not necessarily identical, to the requirements in paragraph (a)(2) of 40 CFR 60.48b. For reference purposes in preparing the monitoring plan, see OAQPS "Determination of Visible Emission Opacity from Stationary Sources Using Computer-Based

Photographic Analysis Systems." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality and Planning Standards; Sector Policies and Programs Division; Measurement Policy Group (D243-02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Preliminary Methods.

[40 CFR 60.48b(a)]

10. COMS Alternative. The owner or operator that meets the conditions in either paragraph (j)(1), (2), (3), (4), (5), (6), or (7) of 40 CFR 60.48b is not required to install or operate a COMS if the facility uses a PM CEMS to monitor PM emissions or uses an ESP as the primary PM control device and uses an ESP predictive model to monitor the performance of the ESP developed in accordance and operated according to the most current requirements in 40 CFR 60.48Da. The CEMS, COMS, or ESP model must be installed and operating within 270 days of the issuance of the permit. [Rule 62-4.070(3), F.A.C. and 40 CFR 60.48b(j)]

11. Alternative to COMS - ESP Model Option. The owner or operator must monitor the performance of each electrostatic precipitator operated to comply with the applicable PM emissions limit using a continuous opacity monitoring system (COMS) unless using an ESP predictive model developed in accordance with the following requirements in paragraphs (o)(3)(i) through (v) of 40 CFR 60.48Da:

    a. Calibrate the ESP predictive model operating under normal conditions.

    b. Develop a site-specific monitoring plan that includes a description of the ESP predictive model used, the model input parameters, and the procedures and criteria for establishing monitoring parameter baseline levels indicative of compliance with the PM emissions limit. The site-specific monitoring plan must be submitted for approval by the permitting authority within 180 days of the issuance of this permit. For reference purposes in preparing the monitoring plan, see the OAQPS "Compliance Assurance Monitoring (CAM) Protocol for an Electrostatic Precipitator (ESP) Controlling Particulate Matter (PM) Emissions from a Coal-Fired Boiler." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality Planning and Standards; Sector Policies and Programs Division; Measurement Policy Group (D243-02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Continuous Emission Monitoring.

    c. Run the ESP predictive model using the applicable input data each boiler operating day and evaluate the model output for the preceding boiler operating day excluding periods of affected facility startup, shutdown, or malfunction. If the values for one or more of the model parameters exceed the applicable baseline levels determined according to the approved site-specific monitoring plan, an investigation must be initiated of the relevant equipment and control systems within 24 hours of the first discovery of a model parameter deviation and, take the appropriate corrective action as soon as practicable to adjust control settings or repair equipment to return the model output to within the applicable baseline levels.

    d. Record the ESP predictive model inputs and outputs and any corrective actions taken. The record of corrective action taken must include the date and time during which the model output values exceeded the applicable baseline levels, and the date, time, and description of the corrective action.

    e. If after 7 consecutive days a model parameter continues to exceed the applicable baseline level, then a new PM performance test must be conducted according to paragraph (o)(1) of 40 CFR 60.48Da. This new performance test must be conducted within 60 calendar days of the date that the model parameter was first determined to exceed its baseline level unless a waiver is granted by the permitting authority.

    [Rule 62-4.070(3), F.A.C.; 40 CFR 60.48b(a) and 40 CFR 60.48Da(o)(3)]

REPORTING AND RECORDKEEPING REQUIREMENTS

12. Fuel Usage Records. Except as provided in b. below, the facility shall record and maintain records as specified in paragraph (d)(1) of 40 CFR 60.49b.

    a. The facility shall record and maintain records of the amounts of fuel combusted during each day.

    b. As an alternative to meeting the requirements of a. above, the facility may elect to record and maintain records of the amount of fuel combusted during each calendar month.

    [40 CFR 60.49b(d)]

13. Opacity Records. The owner or operator shall maintain records of opacity. In addition, an owner or operator that elects to monitor emissions according to the requirements in 40 CFR 60.48b(a) shall maintain records according to the requirements specified below, as applicable to the visible emissions monitoring method used.

    a. For each performance test conducted using Method 9, the owner or operator shall keep records of the dates and time intervals of all opacity observation periods; name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and copies of all visible emission observer opacity field data sheets;

    b. For each performance test conducted using Method 22, the owner or operator shall keep the records of the dates and time intervals of all visible emissions observation periods; the name and affiliation for each visible emission observer participating in the performance test; copies of all visible emission observer opacity field data sheets; and documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the owner or operator to demonstrate compliance with the applicable monitoring requirements.

    c. For each digital opacity compliance system, the owner or operator shall maintain records and submit reports according to the requirements specified in the site-specific monitoring plan approved by the Administrator.

    [40 CFR 60.49b(f)]

14. Excess Emissions Reporting. Excess emission reports must be submitted for any excess emissions that occurred during the reporting period. Excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f). In lieu of submitting the written excess emission reports, electronic quarterly reports may be submitted. The format of each quarterly electronic report shall be coordinated with the permitting authority. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this subpart was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the permitting authority to obtain their agreement to submit reports in this alternative format. [40 CFR 60.49b(h) & (v)]

15. Record Retention. All records required under 40 CFR 60 subpart Db shall be maintained by the owner or operator for a period of 2 years following the date of such record. [40 CFR 60.49b(o)]

COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

16. Compliance Monitoring Plan. These emissions units are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the approved Compliance Monitoring Plan. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. This permit results in changes that need to be incorporated into the Compliance Monitoring Plan and Compliance Assurance Monitoring Plan. Permittee will provide an updated Compliance Monitoring Plan and an updated CAM Plan within 180 days of issuance of this permit for

Department review and approval. [40 CFR 64 Rules 62-204.800 and 62-213.440(4)(b)4., F.A.C.; and Application No. 0630058-016-AC and 017-AV]

B. Dryer Line 3

This section of the permit addresses the following emissions unit.

I.D. No.	Emissions Unit Description
009	Dryer Line 3

SPECIFIC CONDITIONS

1. Previous Permits: This permit supplements all previously issued air construction and operation permits for this emissions unit. [Rules 62-4.070(3), F.A.C.]

2. Dryer Line 3 authorization removed. The authorization to install Dryer Line 3 is removed. All specific conditions and references applicable only to Dryer Line 3 are obsolete and are hereby removed. [Application No. 0630058-016-AC]

C. Pelleting Lines 1 thru 3

This section of the permit addresses the following emissions unit(s).

I.D. No.	Emissions Unit Description
004	Pelleting Line 1
005	Pelleting Line 2
006	Pelleting Line 3

SPECIFIC CONDITIONS

1. Previous Permits. This permit supplements all previously issued air construction and operation permits for this emissions unit(s). Except for the change noted below, the unit remains subject to the conditions of all other valid air construction and operations permits. [Rules 62-4.070(3), F.A.C.]

2. Permitted Capacity - Annual Capacity. The maximum annual production of wood pellets for all three Pelleting Lines combined shall be no more than 827,000 tons per year. [Rules 62-4.070(3), and 62-210.200(PTE), F.A.C., and Application No. 0630058-016-AC]

   {Permitting Note: Permit 0630058-011-AC removed annual capacity limits but the facility has requested that emissions be based on annual pellet production and not on 8760 hours per year.}

TESTING REQUIREMENTS

3. Subsequent Annual Testing of VOC, HAP, and PM on Pellet Cooler Exhaust. Annual tests to verify emissions estimates for Volatile Organic Compounds, Hazardous Air Pollutants (specifically methanol, formaldehyde and acetaldehyde) and Particulate Matter (PM) shall be conducted for two years after the effective date of this permit on one of the Pelleting Lines Cooler Exhaust Stacks 1 through 3. Permittee shall choose the test stacks, based on knowledge of the process and operating conditions during testing, to be the best example of the equipment running at full capacity *(121 tons pellets per hour, on a 4-hour average basis)*. Notification of testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3), 62-210.370(1) &(2)(d)1, and 62-212.300(1)(e), F.A.C., and Application No. 0630058-016-AC]

4. Subsequent Annual Testing of VOC, HAP, and PM revoked on horizontal Hammer Mill Stack. Annual VOC, HAP, and PM testing required for 5 years after the issuance of Permit 0630058-011-AC on one of the horizontal Hammer Mill Stacks is being revoked with this permit. [Rule 62.4-070(3) and Application No. 0630058-016-AC]

{Permitting Note: VOC, HAP, and PM testing required with Permit 0630058-011-AC on one of the horizontal Hammer Mill Stacks is being removed because the hammer mill and pellet mill aspiration systems exhaust to the Dryer Line Furnaces as of Permit 0630058-014-AC}