

Green Circle Bio Energy, Inc.
Cottondale Wood Pellet Plant
Facility ID No.: 0630058
Jackson County

Title V Air Operation Permit Revision

Permit No.: 0630058-017-AV
(Revision to Title V Air Operation Permit No.: 0630058-005-AV)



Permitting and Compliance Authority:

Florida Department of Environmental Protection
Northwest District Waste/Air Resources Program
160 W. Government Street, Suite 308
Pensacola FL 32502-5740

Telephone: 850.595.8300
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Title V Air Operation Permit Revision

Draft Proposed Permit No.: 0630058-017-AV

Revision to Title V Air Operation Permit No.: 0630058-005-AV

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Florida Department of Environmental Protection

Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PROPOSED PERMIT

Permittee:

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

Draft Proposed Permit No.: 0630058-017-AV

Facility ID No.: 0630058

SIC No(s).: 24, 2499

Project: Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V Air Operation Permit for the above reference facility. The existing facility is located in Jackson County at 2500 Green Circle Parkway in Cottdale, Florida. UTM Coordinates: Zone 16, 653.9 km East and 3401.7 km North; and, Latitude: 30° 44' 17" North and Longitude: 85° 23' 33" West.

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

Initial Effective Date: March 17, 2011

First Revision Effective Date: November 11, 2012

Second Revision Effective Date: July 08, 2013

Third Revision Effective Date: ,2014

Renewal Application Due Date: August 5, 2015

Expiration Date: March 17, 2016

(Draft/Proposed)

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

JCH/dm/r

Section I. Facility Information.

This is the third revision to Initial Title V permit 0630058-005-AV, effective March 16, 2011, to incorporate construction permits 0630058-011-AC, issued August 21, 2012, and 0630058-014-AC, issued August 27, 2013. Permit 0630058-014-AC was a modification to 0630058-011-AC. This Title V permit revision is being concurrently processed with construction permit 0630058-016-AC. Permit 0630058-016-AC is a modification to construction permit 0630058-014 and revokes the authorization to construct a third dryer; updates specific conditions of 40 CFR 60 subpart Db to the existing dryer lines (EU002 and EU003); and revises the frequency of compliance testing.

Subsection A. Facility Description.

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. Wood fiber (pulpwood logs, dry wood chips or sawmill residuals) is unloaded and stored. Logs are debarked and stored; bark is hammer-milled, screened and stored. All stored piles are conveyed for raw material and/or fuel. The ground wood is compressed into wood pellets. The finished pellets are loaded into railcars for shipment to customers.

The wood fiber receiving and storage area (EU 001) begins with wood fiber being trucked to the Green Circle site as tree-length pulpwood logs (over 95% yellow pine) or sawmill residuals (chips, sawdust, shavings). Site traffic travels on paved roadways to the wood fiber receiving area. All incoming trucks are weighed using on site truck scales. Log trucks are unloaded with the mobile equipment directly into the drum debarker or the on site log storage. Stacked logs are stored on site for use during weather events and other logging curtailments. Ten to twenty days of logs (61,000 tons) will normally be stored on site. An automated Dry Wood Truck Dump directly feeds dry wood chips to the Grinding Storage Bin, bypassing the Dryer Lines and allowing for production flexibility.

Logs are removed from the storage piles by mobile handling equipment, and grapple fed into a single rotary drum debarker, which removes the tree bark as the logs flow through the drum. A drum chipper chips the logs to a very uniform size under 3/8" dimension.

Bruks-Klockner Tubulator belt conveyors are used for chip conveyance. Chips exiting the chipper are conveyed up to the chip storage stacker and reclaimer. Chip storage will have one stacker conveyor and one inclined reclaimer conveyor. Chips are deposited via belt conveyor on the pile top radius opposite the reclaimer. Reclaim of the chips is accomplished with an inclined surface scraper reclaimer. Stacker and reclaimer conveyors pivot around the pile radius to properly inventory the chips and manage on a first in/first out basis. Six days of chip inventory (approximately 20,000 tons) will be stored in the pile to allow for logging delays and equipment upsets. Reclaimed chips are conveyed using belt conveyors to the Dryer Metering Bin.

Bark from the drum debarker is conveyed via belt conveyor up to the bark screen and hog. An electric-powered hammer mill is used to reduce the bark to manageable sizes (minus 2 1/2" dimension) for best fuel handling and combustion. Bark fuel is conveyed via enclosed belt conveyors to the bark sand screen. Fines (i.e., sand) are removed from the bark fuel, to improve combustion efficiency and avoid the deposit of incombustible fly ash in the dry wood chips. Clean bark fuel is conveyed to the fuel storage stacker and reclaimer and managed on a first in/first out basis. A bark fuel supply of six days (approximately 5,000 tons) is maintained.

Two high technology rotary drum dryers, Dryer Lines 1 & 2 (EUs 002 and 003) process the wood chips to 9% moisture content in preparation for grinding and pelleting. Heat for the Chip Dryers is provided by two 125 MMBtu per hour bark fuel combustors, manufactured by the Teaford Company. These combustors have a modern reciprocating grate system for fuel spreading and controlled combustion. High humidity exhaust

gases from the dryers are returned to the Combustors secondary combustion chamber, tempering the combustion and controlling the generation of NO_x. A fraction (11 MMBtu per hour) of the gases from the secondary combustion chamber are drawn through a 6,900 lbs/hr steam generator. Steam is used in the pelleting process to soften the wood fiber prior to compression into pellets. Cooled gases at the exhaust of the steam generator are ducted to the dryer inlet to temper the combustor gases down to the Dryer Inlet target of 950°F.

Each Dryer Line utilizes an 18 foot x 80 foot Rotary Drum Dryer, manufactured by TSI, Inc., to dry the wood chips. Hot gases from the bark combustors are ducted directly to the Dryers. Each Combustor-Dryer system (Dryer Line) operates independently, sharing only the fuel feed system, chip delivery system and Wet Electrostatic Precipitator (WESP) water handling. Chips are delivered via belt conveyor to the common metering bin. Left and right metering mechanisms control the flow of the chips to each Dryer. The chips are dropped through a large six pocket airlock into the front of the Dryer drum.

Exhaust gas recirculation is used to temper the incoming gases. A Dryer inlet temperature of less than 950°F is maintained to reduce the risk of fires, improve the moisture uniformity and control the emission of pollutants. The high humidity and low oxygen content of the resultant dryer gas stream is very useful in drying control and safety. Wood chips and residuals are conveyed through the dryer drum by the mechanical action of internal flighting and by pneumatic transport as the chips dry and become lighter. At the Dryer outlet, the chips are drawn up to the Dryer Cyclone. Sealed and insulated 75" diameter ducting connects the Dryer discharge with a high efficiency cyclone and a Dryer Induced Draft fan. At the Dryer drum discharge, the dry chips are pneumatically conveyed in the lower temperature gas stream up to the Cyclone inlet near the top. Each dryer has one high efficiency cyclone for chip separation and one Induced Draft Dryer Fan.

Up to 50% of the dryer gases leaving the Dryer Induced Draft Fan are re-circulated to the Dryer Inlet to temper the incoming combustor gases, with the remaining gases going to a WESP and Regenerative Thermal Oxidizer (RTO) for PM and VOC emissions control. WESP-bound gases are quenched with a recirculation water system. Each Dryer Line has a dedicated WESP and RTO, sharing a common water sump and handling system (filtration and controls minimize water discharges). Excess water from the WESP is used for ash wetting, combustion control and fuel adjustment in the bark fuel combustors.

Clean gas exiting the WESP is routed to a Regenerative Thermal Oxidizer (RTO), reducing VOC emissions by 95%. Propane gas and natural gas are used as supplemental fuels to maintain RTO efficiency. Clean gases are exhausted to the atmosphere through a 75 foot high RTO exhaust stack for each Dryer Line.

The Pelleting Lines 1, 2 and 3 (EUs 004, 005 and 006) equipment is manufactured by Buhler, Inc. of Switzerland. Dry wood chips are conveyed by a sealed chain conveyor to a dry chip storage bin, with a capacity of approximately 300 tons of dry chips. The dry chip storage bin allows for moisture content equalization (9%).

Dry chips are metered into Pelleting Lines 1, 2 and 3. Sealed chain conveyors transport dry chips from the Dry Chip Storage Bin up into the Hammer Mill Building. All chain conveyors are sealed with continuous air aspiration for dust and fire control. All aspirated air is drawn through Buhler dust filters with an air to cloth ratio lower than 15 actual cubic feet per minute per square feet (ACFM per SF). All material handling of the wood chips and pellets is accomplished mechanically with sealed chain conveyors and augers. Wood dusts collected by the dust filters are directly deposited back into the process via airlocks.

Pelleting Lines 1 and 3 have eight vertical hammer mills each, and Pelleting Line 2 has ten vertical hammer mills. Each hammer mill is manufactured by Buhler, Inc., model Vertical Rotor DFZK-1. The hammer mills accurately grind the dry wood chips to under 4 mm (0.16") in size. The grinding and pelleting process requires frequent scheduled replacement of machinery parts and dies to maintain critical process tolerances. The 28 vertical hammer mills allow for reliable production without variation due to

scheduled hammer mill downtime. The horizontally-oriented, rotor-type hammer mill, manufactured by Buhler, model DFZP-535 HP, can operate continuously as part of Pelleting Line No. 3.

The ground wood fiber is conveyed to three sealed storage and metering bins each with a capacity of approximately 40 tons. A ventilation system in the grinding and pellet storage bins helps minimize condensation. These bins provide equalization time and surge capacity for machinery downtime. Steam is carefully applied to soften the wood fiber as it is drawn into a pellet mill. The wood fiber is compressed by the pellet mill rotating press rolls, exiting through the sizing die. The resultant heat of friction activates the wood lignin as the wood is compressed, effectively bonding the wood fiber into a durable pellet. This raises the pellet temperature in excess of 80°C (180°F) and eliminates any need for adhesives or bonding agents. PM emissions are controlled by two cyclones and fabric filters for each Pelleting Line. With Permit 0630058-014-AC, all hammer mill and pellet mill aspiration systems were vented to existing Dryer Furnaces 1 and 2, which exhaust to the WESPs and RTOs.

Pellets exiting the pellet mills are conveyed via sealed chain conveyor to a counter flow pellet cooler, manufactured by Geelen Counterflow of the Netherlands. Each Pelleting Line has a Pellet Cooler, twin cyclones, single ID fan and an exhaust stack. Pellet cooling reduces the risk of spontaneous combustion. Each cooler uses counter-flow outside air, drawn into the pellet discharge bottom of the cooler, to rapidly cool the pellets to 10°F above ambient air temperature and dry the pellets, losing 1 to 2% moisture content. Cooler exhaust has an air volume of 36,820 ACFM at 160°F. Hot exhaust air from the pellet cooler is ducted to two parallel high efficiency cyclones. These cyclones remove 90% of any entrained PM in the exhaust air. Collected wood dust is discharge via a bottom airlock directly to the sealed chain conveyor delivering wood fiber to the pellet mills. Entrained dust is expected to be coarser wood dust with moderate loadings due to the slow mechanical handling and transport of the finished pellets. The pellets are not subjected to aggressive tumbling or pneumatic transport that could result in dust generation. Pellet cooler exhaust air is ducted from the cyclones to the induced draft fan and discharged through a 74-foot stack.

In the Bulk Load-Out Area (EU 007), pellets exit the counterflow pellet cooler to sealed chain conveyors and are transported to two storage bins above the two rail car loading area. Each bin has a capacity of 94 tons. The bins provide up to about two hours of pellet storage and uniformly meter the pellets out for rail car loading. All conveyors are sealed with dust aspiration air directed to a Buhler dust filter system.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities: A 2000-gallon diesel storage tank (EU 008) is one of these.

Based on the Title V Air Operation Permit Revision application received July 2, 2014, this facility is a major source of hazardous air pollutants (HAP).

PROCESS AREA	ESTIMATED POLLUTANTS (Tons per Year)				
	PM/PM ₁₀	NO _x	CO	VOC	SO ₂
Wood Fiber Receiving & Storage Area	101.5/20.3 ²	NA	NA	NA	NA
Dryer Lines 1 & 2	39.8	245.3	22.2	136.4	0.34 ¹
Pelleting Lines 1, 2, & 3	162.6	NA	NA	360	NA
Bulk Load-out Area	0.71	NA	NA	NA	NA
TOTAL	203.1	245.3	22.2	496.4	0.34

¹ SO₂ potential emission estimates are based on wood firing.

² Wood Fiber fugitives, 32.8 TPY PM₁₀ and 168.3 T/yr PM, are not included in Facility totals.

³ PM based on emission rates from the manufacturer and not on the 0.10 lb PM/MMBtu NSPS Db limit.

The Department determined that Green Circle became a major stationary source for HAPs with the expansion and increase in production authorized by construction permit 0630058-011-AC. After the

completion of project 0630058-011-AC, Green Circle also became categorized as a major stationary source for PSD (prevention of significant deterioration) with respect to VOC, NO_x and PM. Emissions limits from previous permits to keep the facility from being classified as a major stationary source for PSD were removed with Permit 0630058-011-AC because the facility became a major stationary source after construction was completed.

Emissions testing at other facilities and at Green Circle after the issuance of 0630058-011-AC showed VOC emissions to be much higher than previously thought. The facility routed the VOC emissions from the grinder lines and pelleting lines to the wood chip dryers as part of the combustion air under permit 0630058-014-AC. The Department felt the incineration of the VOC was BACT for this facility.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

EU I.D. Brief Description

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
009	Green Wood Chip Grinding System and later Dryer Line 3 <i>{both were not installed}</i>
010	Emergency Fire Pump Engine (CI-ICE)

Unregulated Emissions Units and/or Activities

008 Diesel Fuel Storage Tank

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A, Abbreviations, Acronyms, Citations, and Identification Numbers
Statement of Basis

These documents are on file with the permitting authority:

Initial Title V Air Operation Permit issued March 16, 2011
Application for a Title V Air Operation Permit Revision received July 2, 2014
Additional Information Request dated July 21, 2014
Additional Information Response received August 12, 2014

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. 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.]

2. 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.]

3. General Visible Emissions. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, 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 as described at 40 C.F.R. Part 60, Appendix A-4, adopted and incorporated by reference at Rule 62-204.800, F.A.C. Pursuant to Chapter 62-297, F.A.C., this regulation does not impose a specific testing requirement. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No devices or systems are deemed necessary at this time. [Rule 62-296.320(1), F.A.C., and permit 0630058-001-AC]

5. 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:

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

[Rule 62-296.320(4)(c), F.A.C., permit 0630058-003-AC]

Annual Reports and Fees

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

6. 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.]

7. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available 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>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District Office. Notifications and reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

Department of Environmental Protection
Northwest District Waste Management/Air Resources Program
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5794
Telephone: 850-595-8300; Fax: 850-595-8393

9. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404-562-9155; Fax: 404-562-9163

10. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 3 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit

<u>EU.I.D.</u>	<u>Brief Description</u>
001	Wood Fiber Receiving and Storage Area

Wood fiber (pulpwood logs, dry wood chips or sawmill residuals) is unloaded and stored. Logs are debarked and stored; bark is hammer-milled, screened and stored. All stored piles are conveyed for raw material and/or fuel. A Dry Wood Truck Dump allows “as-delivered” dry wood chips to be fed directly into the existing Grinding Storage Bin, bypassing the Dryer Lines and allowing for production flexibility.

A new Dry Chip Silo was authorized with Permit 0630058-011-AC and has been constructed. Previous permit limits on the maximum allowable number of trucks per day and the requirement to record and maintain the daily number of trucks that deliver wood fiber and sawmill residual was removed with Permit 0630058-011-AC.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.3. Visible Emissions. This emissions unit is subject to Section II, Facility-wide Conditions, General Visible Emissions Standards. [Rule 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

A.4. Visible Emissions. The test method for visible emissions shall be EPA Method 9 as described at 40 C.F.R. Part 60, Appendix A-4, adopted and incorporated by reference at Rule 62-204.800, F.A.C. [Rules 62-296.320(4)(b)1., F.A.C.]

Section III. Emissions Units and Conditions

Subsection B. This section addresses the following emissions units

<u>EU I.D.</u>	<u>Brief Description</u>
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002	Dryer Line 1
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003	Dryer Line 2
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Each Dryer Line consists of a bark fuel combustor which exhausts into a rotary drum wood chip dryer and a steam generator. A portion (11 MMBtu/hour) of the heat generated in each Dryer Line's bark combustor (125 MMBtu/hour total heat input) is routed to each Dryer Line's steam generator. Each dryer exhaust flows through a fan induced drafted cyclone, a wet electrostatic precipitator and a regenerative thermal oxidizer (to control particulate matter (PM), nitrogen oxides (NOx) and volatile organic compounds (VOC) emissions), and out Dryer Line 1 Exhaust Stack and Dryer Line 2 Exhaust Stack. Each Combustor has a bypass for emergencies, identified as Combustor 1 Bypass Stack and Combustor 2 Bypass Stack. Bypass stacks D1-2 for Dryer Line 1 and D2-2 for Dryer Line 2 exhaust from the wood chip dryer and bark fuel combustor, respectively, for each Dryer Line during startups (for temperature control) and malfunctions, but not more than a total of 50 hours per year. Each furnace can operate up to 1,500 hours per year in malfunction "idle mode" (defined as operation at up to a maximum heat input rate of 5 MMBtu/hr) using bypass stacks D1-1 and D2-1 for dryer line furnaces 1 and 2, respectively.

Permit 0630058-016, being concurrently processed with this permit revision, removed the combustor's monitored parameters of wood chip feed screw sets revolutions per hour and combustor hydraulic ram feeder strokes per hour at the facility's request because the pellet production limit of 121 tons per hour, on a daily average basis, can be used as an indicator of compliance with emission limits. The heat input of the steam generator can be determined from Method 19 during testing according to 40 CFR 60 subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

The Dryer Lines are subject to 40 CFR 60, Subpart Db because a portion of the heat generated in each dryer line's bark combustor is routed to the line's steam generator. EPA has determined that the definition of a "steam generating unit" does not require the bark burners to be used "primarily" to heat a "heat transfer medium". This places a PM limit for wood firing of 0.10 pounds per million Btu (lb/MMBtu), except during periods of startup, shutdown and malfunction. The PM limit of 0.2 lb/MMBtu established in permit 0630058-003-AC was from Rule 296.410(2)(b)2. (Carbonaceous Fuel Burning Equipment) and is less stringent than the 0.10 lb/MMBtu PM limit in 40 CFR 60 Subpart Db. Visible emissions (VE) shall not exceed 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity, which is also from 40 CFR 60 subpart Db. Where the federal and state rule requirements overlapped for this emissions unit, the more stringent rule requirement was used in the specific conditions of the permit.

The Department determined that with the expansion and increase in production authorized by Permit 0630058-011-AC Green Circle became a major stationary source for hazardous air pollutants (HAPs) based on widely-accepted, conservative emissions factors for HAP and facility-specific VOC emissions factors based on previous testing. Because EPA determinations have stated that the EPA did not include dryer/steam generator systems similar to those at Green Circle in developing 40 CFR 63, Subpart DDDDD, the Department believes that 40 CFR 63, Subpart DDDDD and similarly 40 CFR 63, Subpart JJJJJ (Boiler MACT) were not intended to regulate, and are not applicable to, the dryer/steam generator systems at Green Circle.

Each Dryer Line has calculated potential to emit emissions of the following air pollutants:

- NO_x - 122.65 tons per year potential emissions based on dryer manufacturer guarantee and AP-42 Chapter 1 Section 6 emission factors for the bark fuel combustor.

- CO - 11.10 tons per year potential emissions based on dryer manufacturer guarantee and AP-42 Chapter 1 Section 6 emission factors for the bark fuel combustor.
- PM/PM₁₀ - 19.90 tons per year potential emissions based on dryer manufacturer guarantee and AP-42 Chapter 1 Section 6 emission factors for the bark fuel combustor.
- VOC - 68.2 tons per year potential emissions based on compliance test performed April 2014
- SO₂ - 0.17 tons per year potential emissions based on AP-42 Chapter 1 Section 6 emission factors for the bark fuel combustor.

Permit 0630058-011-AC removed NO_x and VOC limits because the facility became a major stationary source for PSD. Permit 0630058-014-AC authorized venting all hammer mill and pellet mill aspiration systems to existing Dryer Furnaces 1 and 2. The pellet mill coolers continue to vent to the cyclone systems and then to the atmosphere. Permit 0630058-016-AC changed the PM limit from 0.030 lb/MMBtu to 0.10 lb/MMBtu based on 40 CFR 60.43b(h)(3) instead of 60.43b(h)(1). Permit 0630058-016-AC also revoked the authorization to construct Dryer 3 (EU009) at the facility's request.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Methods of Operation - (i.e., Fuels). The combustors for Dryer Lines 1 and 2 shall be fired with carbonaceous fuel only. [Rules 62-4.070(3) and 62-213.440(1), F.A.C.]

B.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

B.3. Wet Electrostatic Precipitators (WESP) Quenching. The WESP inlet and outlet gas stream quench temperatures shall not exceed 210°F, averaged over three hours. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and Permit 0630058-003-AC]

B.4. Regenerative Thermal Oxidizer (RTO) Combustion Chamber Temperature. The RTO for each Dryer Line shall be operated using propane or natural gas, with a combustion chamber temperature of no less than 1,440°F, averaged over three hours. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and Permit 0630058-008-AC]

Emission Limitations and Standards

B.5. Particulate Matter. Particulate matter emissions from each Dryer Line shall not exceed 43 ng/J (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 Permit 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 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). Permit 0630058-016-AC, which is being concurrently processed with this permit revision, 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 applicable to this emissions unit.}

B.6. Visible Emissions. VE shall not exceed 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. [40 CFR 60.43b(f) & (g) and Permit 0630058-011-AC]
{Permitting Note: This VE from NSPS subpart Db is more stringent than the VE of Rule 62-296.410(2)(b)1.}

Excess Emissions

B.7. Startup, Shutdown and Malfunction. Excess emissions resulting from startup, shut down or malfunction using Dryer Line Bypass stacks (Bypass stacks D1-2 and D1-1 for Dryer Line 1, and D2-2 and D2-1 for Dryer Line 2) shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period nor exceed 50 hours per 12-month rolling total for each Dryer Line. [Rule 62-210.700(1), F.A.C.; 40 CFR 60.43b(g), and Permit 0630058-003-AC]

B.8. Malfunction Idle. Each furnace is allowed to operate up to 1,500 hours per year in malfunction “idle mode” (defined as operation at up to a maximum heat input rate of 5 MMBtu/hr) using bypass stacks D1-1 and D2-1 for dryer line furnaces 1 and 2, respectively. [Permit 0630058-003-AC]

B.9. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Excess Emissions. [Rules 62-4.070(1) & (3), F.A.C.]

Test Methods and Procedures

B.10.a. Visible Emissions. Except as provided in paragraph (j) of 40 CFR 60.48b(a), the owner or operator shall install, calibrate, maintain, and operate a 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. 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.

B.10.b. Visible Emissions Test Schedule. Except as provided in paragraph (a)(2) and (a)(3) of 40 CFR 60.48b (see g. and h. below), the owner or operator shall conduct subsequent Method 9 performance tests using the procedures in paragraph (a) of 40 CFR 60.48b (see a. above) according to the following applicable schedule (see c., d., e. and f. below) as determined by the most recent Method 9 performance test results:

B.10.c. 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;

B.10.d. 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;

B.10.e. 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

B.10.f. 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.10.g. 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.

B.10.h. 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) and Permit 0630058-016-AC]

B.11. PM Emissions Tests. Once during the Federal Fiscal year (October 1-September 30) prior to operating permit renewal, Dryer Line 1 Exhaust Stack and Dryer Line 2 Exhaust Stack shall be tested to demonstrate compliance with emissions standards for PM 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 (O₂) or CO₂ 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 O₂ or CO₂ 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]

B.12. VOC and NO_x tests. Once during the Federal Fiscal year (October 1-September 30) prior to operating permit renewal, Dryer Line 1 Exhaust Stack and Dryer Line 2 Exhaust Stack shall be tested to verify estimates of Volatile Organic Compounds and Nitrogen Oxides. The tests shall be performed in accordance with the reference methods 7E and 25A as described in Appendix A of 40 CFR 60 and adopted by reference in Rule 62-204.800. [Rules 62-4.070(3), 62-204.800, and 62-297.310(7)(a)4., F.A.C.; Appendix A of 40 CFR 60; and Permit 0630058-011-AC]

B.13. Test Requirements. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. For each test run, the report shall also indicate the dryer line combustor heat input, the dryer line WESP inlet and outlet gas stream quench temperatures, and the dryer line regenerative thermal oxidizer (RTO) combustion chamber temperature. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) & (8) and 62-297.620(1), F.A.C.]

B.14. Testing Rate. Testing of emissions shall be conducted with the source operating at the permitted maximum production capacity rate (*for testing purposes, pellet production capacity rate is 121 tons pellets per hour, on a 4-hour average basis*). Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than production capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

Monitoring of Operations

B.15. 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 180 days of the issuance of the permit. [Rule 62-4.070(3), F.A.C. and 40 CFR 60.48b(j)]

B.16. 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:

- i. Calibrate the ESP predictive model operating under normal conditions.
- ii. 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.
- iii. 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.
- iv. 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.
- v. 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)]

B.17. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Monitoring of Operations. [Rules 62-4.070(1) & (3), F.A.C.]

Compliance Assurance Monitoring (CAM) Requirements

B.18. CMP and CAM Plan. These emissions units are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the Compliance Monitoring Plan (CMP) (attached). 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]

Recordkeeping and Reporting Requirements

B.19. Operating Parameter Records. Records of the date, time, hours, total running hours, hourly WESP gas stream inlet and outlet quench temperatures, and hourly RTO combustion chamber temperatures as a

three hour average shall be kept and made available for Department inspection. [Rules 62-4.070(3) and 62-213.440(1), F.A.C., and Permits 0630058-010-AC and 0630058-011-AC]

B.20. 40 CFR 60 Subpart Db Requirements. Except as provided in paragraph (d)(2) of 40 CFR 60.49b, the owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. As an alternative to meeting the requirements of paragraph (d)(1) of 40 CFR 60.49b, the owner or operator may elect to record and maintain records of the amount of fuel combusted during each calendar month. [40 CFR 60.49b(d)]

B.21. 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 following requirements specified in paragraphs (f)(1) through (3) of 40 CFR 60.48b, as applicable to the visible emissions monitoring method used.

- i. 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; the 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;
- ii. 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.
- iii. 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)]

B.22. 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)]

B.23. Records 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)]

B.24. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Recordkeeping and Reporting. [Rules 62-4.070(1) & (3), F.A.C.]

Section III. Emissions Unit(s) and Conditions

Subsection C. This section addresses the following emissions units

<u>EU I.D.</u>	<u>Brief Description</u>
004	Pelleting Line 1
005	Pelleting Line 2
006	Pelleting Line 3

Pelleting Lines 1, 2 and 3 have a combined maximum process rate of 121 tons per hour and 827,000 tons of pellets per year. Pelleting Lines 1 and 3 have eight vertical hammer mills each and Pelleting Line 2 has ten vertical hammer mills. The hammer mills accurately grind the dry wood chips to under 4 mm (0.16”) in size. The ground wood fiber is conveyed to three sealed storage and metering bins each with a capacity of approximately 40 tons. A ventilation system in the grinding and pellet storage bins helps minimize condensation. Steam is carefully applied to soften the wood fiber as it is drawn into a pellet mill. The wood fiber is compressed by the pellet mill rotating press rolls, exiting through the sizing die. The resultant heat of friction activates the wood lignin as the wood is compressed, effectively bonding the wood fiber into a durable pellet. Pellets exiting the Pellet mills are conveyed via sealed chain conveyor to a counter flow pellet cooler. Each Pelleting Line has a Pellet Cooler, twin cyclones, a single ID fan and an exhaust stack. Each Pelleting Line has five pellet mills with each line authorized to get a new pellet mill in permit 0630058-011-AC. A new pellet mill has been installed on Pellet Mill Line No. 3.

Ten new horizontal hammer mills were authorized by Permit 0630058-011-AC but this authorization was revoked in Permit 0630058-014-AC. All hammer mill and pellet mill aspiration systems were routed (Permit 0630058-014-AC) by a furnaces VOC control air handling system to Dryer Line Furnaces 1 and 2. The authorization for the removal of the existing pelleting lines’ aspiration dust collectors and venting their exhaust stream to the cooler exhaust stream for each pelleting line was revoked with Permit 0630058-014-AC. The pellet mill coolers continue to vent to the twin cyclone systems and then to the atmosphere. After the construction of the VOC control air handling system, these emissions units were no longer subject to the Compliance Assurance Monitoring (CAM) requirements contained in the Compliance Monitoring Plan (CMP) because the Dryer Line Furnaces use their WESPs and RTOs as emission control devices for the hammer mills and pellet mills.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity - Hourly Capacity. For testing purposes only, the combined hourly pellet production for the Pelleting Lines is 121 tons per hour, measured at the Pellet Bulk Loadout, on a 4-hour average basis calculated during testing. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and Permit 0630058-011-AC]

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. The facility has requested in Application No. 0630058-016-AC that emissions be based on annual pellet production and not on 8760 hours per year.}

C.3. Reduction of Pelleting Lines Operating Rate. When one or more of the Dryer Line Furnaces is not able to process the exhaust from the VOC control air handling system, permittee will reduce the processing

rate of the pelleting lines so the resulting volume flow from the VOC control air handling system will not overwhelm the air handling capability of the remaining Dryer Line Furnace(s). [Rules 62-4.070(3) and 62-210.300(1), F.A.C., and Permit 0630058-014-AC]

C.4. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

C.5. Visible Emissions: Visible emissions shall not exceed 20 percent opacity. [Rule 62-296.320(4)(b), F.A.C.]

Excess Emissions

C.6. This emissions unit is subject to Section III, Subsection F, Common Conditions, Excess Emissions. [Rules 62-4.070(1) & (3), F.A.C.]

Test Methods and Procedures

C.7.a. 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 one through three. 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, measured at the Pellet Bulk Loadout, on a 4-hour average basis*). Required test shall be performed using test reference methods 25A and 320. Test methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800. No other methods may be used unless prior written approval is received from the Department. [Rules 62-4.070(3), 62-204.800, 62-210.370(1) &(2)(d)1, and 62-212.300(1)(e), F.A.C.; Appendix A of 40 CFR 60; and Permit 0630058-016-AC]

{Permitting Note: Annual VOC, HAP, and PM testing required for 5 years after the issuance of Permit 0630058-011-AC on the horizontal Hammer Mill Stack was revoked with Permit 0630058-016-AC because the hammer mill and pellet mill aspiration systems exhaust to the Dryer Line Furnaces as of Permit 0630058-014-AC}

C.7.b. Emissions Tests Prior to Permit Renewal. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. VE, PM, and VOC tests shall be scheduled once during the Federal Fiscal year (October 1-September 30) prior to each permit renewal. PM using EPA Method 5 and VOC tests using Method 25A shall be conducted on stacks P1-2, P2-2 and P3-2 for Pelleting Lines 1, 2 and 3, respectively, with sampling ports properly located in accordance with EPA Method 1. The second annual test required with Permit 0630058-016-AC (above) can be used to satisfy the emissions test requirement prior to the next permit renewal. [Rules 62-4.070(3), 62-204.800, 62-297.310(7), F.A.C.; and Appendix A of 40 CFR 60]

C.7.c. Test Requirements. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) & (8) and 62-297.620(1), F.A.C.]

C.7.d. Testing Rate. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated hourly capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated hourly capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

C.8. Pelleting Lines 1, 2 and 3 Production During Testing. Verification of emissions estimates for the Pelleting Lines shall be demonstrated with records of the bulk load-out process rate measured in tons of pellets per hour averaged over the time that compliance testing is conducted. Records shall be submitted with the emissions test reports. [Rule 62-4.070(3), F.A.C., and Permit 0630058-011-AC]

Recordkeeping and Reporting Requirements

C.9. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Recordkeeping and Reporting. [Rule 62-4.070(1) & (3), F.A.C.]

Section III. Emissions Units and Conditions

Subsection D. This section addresses the following emissions unit

<u>EU I.D.</u>	<u>Brief Description</u>
007	Bulk Load-out Area

Pellets are transported to two storage bins, each with a capacity of 94 tons, and located above the rail car loading area. The bins provide up to about two hours of pellet storage and uniformly meter out the pellets for rail car loading. All conveyors are sealed with dust aspiration air directed to a Buhler dust filter system, exhausting through the Bulk Load-out Exhaust Stack.

The Bulk Load-out Area has PM/PM₁₀ emissions of 0.71 tons per year potential emissions based on a manufacturer's guarantee.

Permit 0630058-011-AC increased the maximum allowable process rate from 88.8 tons of pellets per hour averaged over a 24-hour period to 121 tons of pellets per hour averaged over a 24-hour period. PM/PM₁₀ emissions do not increase based on manufacturer guarantee in a letter dated April 16, 2012 and included with the permit application 0630058-011-AC.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The permitted maximum allowable facility production rate is 827,000 tons of pellets per year. The permitted maximum allowable hourly rate for testing purposes is 121 tons of pellets per hour averaged over the testing period. [Rules 62-4.070(3), 62-210.200(PTE), 62-210.200(194), and 62-212.400(2)(a)3., F.A.C., and Permit 0630058-011-AC]

D.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

Excess Emissions

D.3. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Excess Emissions. [Rules 62-4.070(1) & (3), F.A.C.]

Monitoring of Operations

D.4. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Monitoring of Operations. [Rules 62-4.070(1) & (3), F.A.C.]

Recordkeeping and Reporting Requirements

D.5. Process Records. Permittee shall maintain records of the bulk load-out process rate measured in tons of pellets per hour averaged on a 24-hour basis, calculated daily, and 12-month rolling totals of tons of pellets per year. Records shall be kept and made available for Department inspection. [Rule 62-4.070(3), F.A.C., and Permit 0630058-011-AC]

D.6. Common Conditions. This emissions unit is subject to Section III, Subsection F, Common Conditions, Recordkeeping and Reporting. [Rules 62-4.070(1) & (3), F.A.C.]

Section III. Emissions Units and Conditions

Subsection E. This section addresses Common Conditions of the following emissions units.

<u>EU.I.D.</u>	<u>Brief Description</u>
010	Emergency Fire Pump Engine, CI RICE

This emissions unit consists of a 110 Hp John Deere Model JU4H-UF58 compression ignition (CI) internal combustion engine, with a displacement of 1.05 liters per cylinder. The four cylinder 4.5 L displacement engine was manufactured December 2007 and meets the definition of a new engine. This engine is subject to applicable requirements of 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

Engine Identification	Engine Brake HP	Date of Purchase	Model Year	Displacement liters per cylinder (l/c)	Engine Manufacturer	Model No. / Serial No.
Fire Pump	110 (82 kW)	01/2008	2007	1.05	John Deere	JU4H-UF58 CD4045B020 286

The following specific conditions apply to the emissions unit listed above:

E.1. NESHAP Subpart ZZZZ Applicability. This diesel engine is a new, stationary Liquid Fueled Compression Ignition Reciprocating Internal Combustion Engine (RICE) and shall comply with applicable provisions of 40 CFR 63 Subpart ZZZZ. Pursuant to 40 CFR 63.6590(c), the engine may meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. No further requirements of Subpart ZZZZ apply for such engines. [Rule 62-204.800(8)(b)79, F.A.C.; 40 CFR 63.6590(a)(2)(ii); 40 CFR 63.6590(c)(6); and Permit 0630058-013-AV]

Essential Potential to Emit (PTE) Parameters

E.2. Maximum Operating Rate (Internal Combustion Engine). The maximum operation rate for the internal combustion (IC) engine is 110 HP. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Permit 0630058-013-AV]

E.3. Restricted Hours of Operation. An emergency stationary ICE must be operated according to the requirements in paragraphs (f)(1) through (3) of 40 CFR 60.4211. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of 40 CFR 60.4211, is prohibited. If the engine is not operated according to the requirements in paragraphs (f)(1) through (3) of 40 CFR 60.4211, the engine will not be considered an emergency engine under 40 CFR 60 subpart IIII and must meet all requirements for non-emergency engines. The emergency stationary ICE may be operated for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of 40 CFR 60.4211 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of 40 CFR 60.4211 counts as part of the 100 hours per calendar year allowed by paragraph (f)(2).

- a. *Emergency Situations.* There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 60.4211(f)(1)]
- b. *Maintenance and Testing.* Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority

- and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [40 CFR 60.4211(f)(2)(i)]
- c. *Emergency Demand Response.* Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [40 CFR 60.4211(f)(2)(ii)]
 - d. *Deviation of Voltage.* Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [40 CFR 60.4211(f)(2)(iii)]
 - e. *Non-emergency Situations.* Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of 40 CFR 60.4211. Except as provided in paragraph (f)(3)(i) of 40 CFR 60.4211, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. . [40 CFR 60.4211(f)(3)]
 - f. *Supply Power Conditions.* The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - 1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
 - 2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - 3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - 4. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - 5. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[40 CFR 60.4211(f)(3)(i) and Permit 0630058-013-AV]

E.4. Authorized Fuel. This emergency stationary compression ignition internal combustion engine must use diesel fuel that meets the following requirements for non-road diesel fuel:

- a. *Sulfur Content.* The sulfur content shall not exceed = 15 ppm = 0.0015% by weight (ultra low sulfur) for non-road fuel.
- b. *Cetane and Aromatic.* The fuel must have a minimum cetane index of 40 or must have a maximum aromatic content of 35 volume percent.
- c. *Use of Existing Fuel.* Any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

[40 CFR 60.4207(b) and 40 CFR 80.510(b) and Permit 0630058-013-AV]

E.5. Operation and Maintenance. The owner or operator must operate and maintain the stationary CI internal combustion engines according to the manufacturer's emission-related written instructions or

procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those emission-related settings that are permitted by the manufacturer. This engine must be maintained and operated to meet the emissions standards over the entire life of the engine. [40 CFR 60.4206 and 40 CFR 60.4211(a)(1), (2) & (3); and Permit 0630058-013-AV]

Emission Standards

E.6. Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

- a. NO_x + NMHC Emissions. Emissions of NO_x plus non-methane hydrocarbons shall not exceed 10.5 grams per kilowatt hour (g/kW-hr).
- b. CO Emissions. Carbon monoxide (CO) emissions shall not exceed 5.0 g/kW-hr.
- c. PM Emissions. Particulate matter (PM) emissions shall not exceed 0.8 g/kW-hr.

[40 CFR 60.4205(c), & Table 4 of 40 CFR 60 Subpart III; and Permit 0630058-013-AV]

Testing and Compliance Requirements

E.7. Engine Certification and Optional Compliance Requirements. Owners and operators of a CI fire pump engine that is manufactured prior to the model years in table 3 to this subpart and must comply with the emission standards specified in 40 CFR 60.4205(c), must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) through (5) of this section.

- (1) Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.
- (2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.
- (3) Keeping records of engine manufacturer data indicating compliance with the standards.
- (4) Keeping records of control device vendor data indicating compliance with the standards.
- (5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 CFR 60.4212, as applicable.

[40 CFR 60.4211(b) and Permit 0630058-013-AV]

E.8. Compliance Requirements Due to Loss of Certification. If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

1. N/A
2. You must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
3. N/A

[40 CFR 60.4211(g) and Permit 0630058-013-AV]

E.9. Testing Requirements. In the event performance tests are required due to the loss of certification, owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who

conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

- (a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.
- (b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.
- (c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \quad (\text{Eq. 1})$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in 40 CFR 60.4213 of this subpart, as appropriate.

- (d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in 40 CFR 60.4204(a), 40 CFR 60.4205(a), or 40 CFR 60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 60.4204(a), 40 CFR 60.4205(a), or 40 CFR 60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in 40 CFR 60.4204(a), 40 CFR 60.4205(a), or 40 CFR 60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in 40 CFR 60.4204(a), 40 CFR 60.4205(a), or 40 CFR 60.4205(c) may follow the testing procedures specified in 40 CFR 60.4213, as appropriate.

- (e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

[40 CFR 60.4212 and Permit 0630058-013-AV]

Monitoring of Operations

E.10. If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211.

- (a) **Hour Meter.** If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.
- (b) **Diesel Particulate Filter.** If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

[40 CFR 60.4209 and Permit 0630058-013-AV]

Recordkeeping Requirements

E.11. Operation Records. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

[40 CFR 60.4214(b) and Permit 0630058-013-AV]

E.12. Diesel Filter Records. If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

[40 CFR 60.4214(c) and Permit 0630058-013-AV]

E.13. Annual Report. If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in 40 CFR 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

- (1) The report must contain the following information:
 - (i) Company name and address where the engine is located.
 - (ii) Date of the report and beginning and ending dates of the reporting period.
 - (iii) Engine site rating and model year.
 - (iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - (v) Hours operated for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii).
 - (vi) Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii).
 - (vii) Hours spent for operation for the purposes specified in 40 CFR 60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
- (2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
- (3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 60.4.

[40 CFR 60.4214(d) and Permit 0630058-013-AV]

E.14. Maintenance Records. To demonstrate compliance with the manufacturer's written instructions for maintaining the certified engine and to document when compliance testing must be performed pursuant to

Compliance Requirements Due to Loss of Certification, the owner or operator must keep the following records:

- a. Engine manufacturer data indicating compliance with the standards.
- b. A copy of the manufacturer’s written instructions for operation and maintenance of the certified engine.
- c. A written maintenance log detailing the date and type of maintenance performed on the engine, as well as any deviations from the manufacturer’s written instructions.

[Rule 62-213.440(1), F.A.C. and Permit 0630058-013-AV]

E.15. 40 CFR 60 Subpart A, General Provisions. This engine shall comply with all applicable requirements of 40 CFR 60 Subpart A, General Provisions, which have been adopted by reference in Rule 62-204.800(8)(d), F.A.C. This engine shall comply with the applicable portions of Appendix 40 NSPS Subpart A included with this permit, as specified below.

General Provisions Citation	Subject of Citation
§ 60.1	General applicability of the General Provisions
§ 60.2	Definitions (see also 40 CFR 60.4219)
§ 60.3	Units and abbreviations
§ 60.4	Address
§ 60.5	Determination of construction or modification
§ 60.6	Review of plans
§ 60.7	Notification and Recordkeeping (as specified in 40 CFR 60.4214(a))
§ 60.8	Performance tests (if required)
§ 60.9	Availability of information
§ 60.10	State Authority
§ 60.12	Circumvention
§ 60.14	Modification
§ 60.15	Reconstruction
§ 60.16	Priority list
§ 60.17	Incorporations by reference
§ 60.19	General notification and reporting requirements

[40 CFR 60.4218]

Section III. Emissions Units and Conditions

Subsection F. This section addresses Common Conditions for the following emissions units.

ID No.	Emissions Unit Description
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

The following specific conditions apply to the emissions units listed above:

Excess Emissions

F.1. Excess Emissions Requirements. Excess emissions resulting from startup, shut down or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shut down or malfunction shall be prohibited. In case of excess emissions resulting from malfunctions, each owner or operator shall notify the in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(1), (4) & (6), F.A.C.]

Monitoring of Operations

F.2. CMP and CAM Plan. Permittee shall update the current Department approved Compliance Monitoring Plan (CMP) (attached) within 180 days of issuance of this permit. The CMP shall contain established operating, monitoring and recordkeeping procedures for determining compliance with permit requirements for each emissions unit. Portions of the CMP approved by the Department shall be included in the operation permit at the Department's discretion. The Department may add parameters and recording frequencies deemed necessary to assure compliance and best management practices. [Rule 62-4.070(3), F.A.C., Permits 0630058-003-AC and 0630058-010-AC; and Application No. 0630058-016-AC and 017-AV]

{Permitting Note: The CMP can have the CAM plan included if the CMP specifically indicates that the CAM plan is included in the CMP.}

Recordkeeping and Reporting Requirements

F.3. Daily Averages Where daily averages are required they are to be made available daily for Department inspection. Verified 30-day, 365-day and 12-month rolling periods' calculated values shall be current and made available no later than 15 days following the end of each calendar month. [Rule 62-4.070(3), F.A.C. and Permit 0630058-011-AC]

F.4. Information Retention Information required by the permit, such as but not limited to quantities of fuels used, pellet production, daily and average records, and maintenance logs shall be maintained at the facility for a minimum of five years and made available for Department inspection upon request. [Rule 62-4.070(3), F.A.C. and Permit 0630058-011-AC]