



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically Sent- Received Receipt Requested

joseph.iadisernia@gmail.com

Joseph Iadisernia, Owner
Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467

Re: **Intent to Issue Permit No. 0694866-001-AC**
Quality Shavings of South Florida, LLC Facility
Minor Source Air Construction Permit
Project: Wood Chip Dryer

Dear Mr. Iadisernia:

On February 7, 2014, you submitted an Air Construction Permit Application for Quality Shavings of South Florida, LLC Facility. This facility is located in Lake County at 26444 County Road 33 in Groveland, Florida.

This is the Department's Intent to Issue Permit No. 0694866-001-AC. Enclosed are the following documents: Written Notice of Intent to Issue Air Permit; Public Notice of Intent to Issue Air Permit; Draft Permit and Appendices; and, Technical Evaluation and Preliminary Determination. The Public Notice of Intent to Issue Air Permit is the actual notice that you must be published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the project engineer, Jeff Rustin, P.E., at (407) 897-2930. His e-mail address is jeff.rustin@dep.state.fl.us.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste and Air Resource Programs Administrator

Enclosures

FTL/jr

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an

Application for Air Permit by:

Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467

Project No. 0694866-001-AC
Synthetic Minor Source
Air Construction Permit
Lake County, Florida

Authorized Representative:

Joseph Iadisernia, Owner,
Quality Shavings of South Florida, LLC

Quality Shavings of South Florida,
LLC
Project: Wood Chip Dryer

Facility Location: Quality Shavings of South Florida, LLC operates Quality Shavings of South Florida, LLC Facility, which is located in Lake County at 26444 County Road 33 in Groveland, Florida.

Project: This is an Air Construction Permit for the installation of an Energy Unlimited wood chip dryer, which will include a 30 MMBTU/hr. burner that will be fueled by wood waste and chips from the South Florida Shavings Company processing facility. Exhaust from the burner will be ducted to a Clean Gas Systems, Inc. cyclone dust collector device prior to exhausting to the atmosphere.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Waste & Air Resource Programs in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767; the e-mail address is DEP_CD@dep.state.fl.us The Permitting Authority's telephone number is 407/897-4100.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site:
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address,

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Orange County, Florida.

 March 14, 2014

F. Thomas Lubozynski, P.E.

Waste and Air Resource Programs Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft 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 March 14, 2014 to the persons listed below:

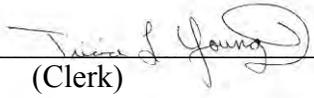
Mr. Joseph Iadisernia, Quality Shavings of South FL, LLC joseph.iadisernia@gmail.com

Mr. John F. Brusa, Jr., P.E., Barton and Loguidice, P.C. jbrusa@bartonandloguidice.com

Mr. William Doeblen IV, P.C., Barton and Loguidice, P.C. wdoebler@bartonandloguidice.com

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

March 14, 2014
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Waste and Air Resource Programs, Central District Office
Minor Source Air Construction Permit
Project No. 0694866-001-AC
Quality Shavings of South Florida, LLC Facility
Lake County, Florida

Applicant: The applicant for this project is Quality Shavings of South Florida, LLC. The applicant's authorized representative and mailing address is:

Mr. Joseph Iadisernia, Owner
Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467

Facility Location: Quality Shavings of South Florida, LLC operates Quality Shavings of South Florida, LLC Facility, which is located in Lake County at 26444 County Road 33 in Groveland, Florida.

Project: This is an Air Construction Permit for the installation of an Energy Unlimited wood chip dryer, which will include a 30 MMBTU/hr. burner that will be fueled by wood waste and chips from the South Florida Shavings Company processing facility. Exhaust from the burner will be ducted to a Clean Gas Systems, Inc. cyclone dust collector device prior to exhausting to the atmosphere.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Waste & Air Resource Programs in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767; the e-mail address is DEP_CD@dep.state.fl.us. The Permitting Authority's telephone number is 407/897-4100.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft

Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically Sent- Received Receipt Requested
joseph.iadisernia@gmail.com

FINAL PERMIT

PERMITTEE

Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467

Authorized Representative:
Joseph Iadisernia, Owner

Air Permit No. 0694866-001-AC
Permit Expires: June 30, 2015
Site Name: Quality Shavings of South
Florida, LLC Facility
Initial Air Construction Permit for a Natural
Minor Source
Project Name: Wood Chip Dryer

This is the final Initial Air Construction Permit. Quality Shavings of South Florida, LLC (Standard Industrial Classification No. 2499) is located in Lake County at 26444 County Road 33 in Groveland, Florida. The UTM coordinates are Zone 17, 412.68 km East, and 3178.65 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility-wide and 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 permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any

person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

DRAFT

_____, 2014
F. Thomas Lubozynski, P.E. Date
Waste & Air Resource Programs Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 , 2014 to the persons listed below.

Mr. Joseph Iadisernia, Quality Shavings of South FL, LLC joseph.iadisernia@gmail.com
Mr. John F. Brusa, Jr., P.E., Barton and Loguidice, P.C. jbrusa@bartonandloguidice.com
Mr. William Doeblor IV, P.C., Barton and Loguidice, P.C. wdoeblor@bartonandloguidice.com

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

DRAFT

_____, 2014
(Clerk) (Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Proposed Project – Quality Shavings of South Florida, LLC Facility

This project is the Initial Air Construction Permit for the facility. The applicant will be installing an Energy Unlimited wood chip dryer, which will include a 30 MMBTU/hr. burner that will be fueled by wood waste and chips from the South Florida Shavings Company processing facility. Exhaust from the burner will be ducted to a Clean Gas Systems, Inc. cyclone dust collector device prior to exhausting to the atmosphere. Based on data obtained from similar installations, the cyclone is rated at greater than 99 percent removal efficiency of particulate matter from the exhaust airstream. The process will also include a wet chip conveyor, shaving equipment, screen, dry chip conveyor, hammermill, and bagging equipment.

This project will add the following emission unit.

Facility ID No. 0694866	
ID No.	Emission Unit Description
001	Wood Chip Dryer with Cyclone Dust Collector

Proposed Project – Quality Shavings of South Florida, LLC Facility

This project is the Initial Air Construction Permit for the facility. The applicant will be installing an Energy Unlimited wood chip dryer, which will include a 30 MMBTU/hr. burner that will be fueled by wood waste and chips from the South Florida Shavings Company processing facility. Exhaust from the burner will be ducted to a Clean Gas Systems, Inc. cyclone dust collector device prior to exhausting to the atmosphere. Based on data obtained from similar installations, the cyclone is rated at greater than 99 percent removal efficiency of particulate matter from the exhaust airstream. The process will also include a wet chip conveyor, shaving equipment, screen, dry chip conveyor, hammermill, and bagging equipment.

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 not a title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is classifies as a natural minor source for carbon monoxide (CO), nitrous oxides (NO_x), particulate matter (PM), volatile organic compounds (VOC), and sulfur dioxide (SO₂).
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This is the initial air permit for the facility. There are no previous air permits.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District, Waste & Air Resource Programs. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us**. In each document, clearly identify the Air Permit Project No. 0694866-001-AC.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.) In each document, clearly identify the Air Permit Project No. 0694866-001-AC and specific emission unit.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as "Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility".
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

7. Operation Permit Application: A completed application for an initial operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this air construction permit. To properly apply for an operation permit, the applicant shall submit the following:
- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - c. the results of the Initial Compliance Test (Specific Condition A.8.) if that report has not been previously submitted; and,
 - d. copies of the most recent two months of records/logs specified in Specific Condition No. **A.13.**

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 001 – Wood Chip Dryer with Cyclone Dust Collector

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Wood Chip Dryer with Cyclone Dust Collector

PERFORMANCE RESTRICTIONS

- A.1. Permitted Capacity: The maximum annual process rate is 107,310 tons of wood chips/wood waste per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200(247), Potential to Emit, F.A.C.]
- A.2. Restricted Operation: The hours of operation are not limited (8,760 hours per year).
[Rule 62-210.200(247), Potential to Emit, F.A.C.]
- A.3. Authorized Fuel: The burner is permitted to only burn wood chips or wood waste.
[Rule 62-210.200(247), Potential to Emit, F.A.C.]
- A.4. 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 is defined as 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. [Rules 62-210.200(214) and 62-296.320(2), F.A.C.]
- A.5. Circumvention: No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

EMISSIONS STANDARDS

- A.6. Visible Emissions Limitation: Visible emissions from the wood chip dryer with cyclone dust collector is limited to 5 percent opacity. [Rule 62-296.711(2), F.A.C.]
- A.7. Visible Emissions Limitation: Visible emissions from each particulate emissions source at the facility, except for the wood chip dryer with cyclone dust collector, are limited to less than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

TEST METHODS AND PROCEDURES

- A.8. Initial Compliance Test: The wood chip dryer with cyclone dust collector shall be tested within thirty (30) days of commencement of operation to demonstrate compliance with the emissions standard for visible emissions specified in Specific Condition No. **A.6**. The report documenting the test results shall be submitted to the Department within 45 days of the test date.
[Rules 62-4.070(3), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 001 – Wood Chip Dryer with Cyclone Dust Collector

{Permitting Note: Compliance Test After Initial Testing: At least ninety (90) days prior to the expiration date of the operation permit (to be issued at a later time), the emissions unit shall be tested to demonstrate compliance with the emissions standard for visible emissions specified in Specific Condition No. **A.6.**}

A.9. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.10. Test Method: Required tests shall be performed in accordance with the following reference method.

Methods	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.11. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the Wood Chip Dryer with Cyclone Dust Collector, EU No. 001, no later than five (5) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070 and 62-210.200(91), Commence Operation, F.A.C.]

A.12. Test Notification: The permittee shall notify the Compliance Authority at least 15 days prior to the date on which each formal compliance test (**A.8.**) is to begin. The notification shall include the following information: date, time, and location of each such test; and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator; and the name, company, and the telephone number of the person conducting the test.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.13. Monthly Log: In order to demonstrate compliance with Specific Condition No. **A.1.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 001 – Wood Chip Dryer with Cyclone Dust Collector

- a. Facility Name, Facility ID No. (i.e., 0694866);
- b. Month and year of record;
- c. Most recent monthly total of wood chips/wood waste processed (tons); and
- d. Most recent consecutive 12-month total of wood chips/wood waste processed (tons).

Monthly logs shall be completed by the end of the following month.

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

- A.14. Record Retention: The records required in Specific Condition No. **A.13.** shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.

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

SECTION 4. APPENDICES

Contents

- Appendix A. Citation Formats and Glossary of Common Terms
- Appendix B. General Conditions
- Appendix C. Common Conditions
- Appendix D. Common Testing Requirements

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located

“2222” represents the specific facility ID number for that county

“001” identifies the specific permit project number

“AC” identifies the permit as an air construction permit

“AF” identifies the permit as a minor source federally enforceable state operation permit

“AO” identifies the permit as a minor source air operation permit

“AV” identifies the permit as a major Title V air operation permit

Florida Administrative Code (F.A.C.)

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

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CAA: Clean Air Act

CMS: continuous monitoring system

CO: carbon monoxide

CO₂: carbon dioxide

COMS: continuous opacity monitoring system

DARM: Division of Air Resource Management

DEP: Department of Environmental Protection

Department: Department of Environmental Protection

dscf: dry standard cubic feet

dscfm: dry standard cubic feet per minute

EPA: Environmental Protection Agency

ESP: electrostatic precipitator (control system for reducing particulate matter)

EU: emissions unit

F.A.C.: Florida Administrative Code

F.A.W.: Florida Administrative Weekly

F.D.: forced draft

F.S.: Florida Statutes

FGD: flue gas desulfurization

FGR: flue gas recirculation

Fl: fluoride

ft²: square feet

ft³: cubic feet

gpm: gallons per minute

gr: grains

HAP: hazardous air pollutant

Hg: mercury

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

ID. : induced draft	PSD : prevention of significant deterioration
ID : identification	psi : pounds per square inch
kPa : kilopascals	PTE : potential to emit
lb : pound	RACT : reasonably available control technology
MACT : maximum achievable technology	RATA : relative accuracy test audit
MMBtu : million British thermal units	RBLC : EPA's RACT/BACT/LAER Clearinghouse
MSDS : material safety data sheets	SAM : sulfuric acid mist
MW : megawatt	scf : standard cubic feet
NESHAP : National Emissions Standards for Hazardous Air Pollutants	scfm : standard cubic feet per minute
NO_x : nitrogen oxides	SIC : standard industrial classification code
NSPS : New Source Performance Standards	SIP : State Implementation Plan
O&M : operation and maintenance	SNCR : selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
O₂ : oxygen	SO₂ : sulfur dioxide
Pb : lead	TPD : tons/day
PM : particulate matter	TPH : tons per hour
PM₁₀ : particulate matter with a mean aerodynamic diameter of 10 microns or less	TPY : tons per year
ppm : parts per million	TRS : total reduced sulfur
ppmv : parts per million by volume	UTM : Universal Transverse Mercator coordinate system
ppmvd : parts per million by volume, dry basis	VE : visible emissions
QA : quality assurance	VOC : volatile organic compounds
QC : quality control	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or

SECTION 4. APPENDIX B

General Conditions

Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority 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(6), F.A.C.]
6. VOC or OS Emissions: No person shall 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. [Rule 62-296.320(1), F.A.C.]
7. 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. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions:
 - a. 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.
 - b. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 - c. Reasonable precautions include the following:
 - (1) Paving and maintenance of roads, parking areas and yards.
 - (2) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

SECTION 4. APPENDIX C

Common Conditions

- (3) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- (4) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- (5) Landscaping or planting of vegetation.
- (6) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- (7) Confining abrasive blasting where possible.
- (8) Enclosure or covering of conveyor systems.

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

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 3 years following the date on which such measurements, records, or data are recorded, unless otherwise specified by Department rule. Records shall be made available to the Department upon request. [Rule 62-4.160, F.A.C.]
11. Emissions Computation and Reporting:
 - a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (2) *Continuous Emissions Monitoring System (CEMS)*.
 - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:

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Common Conditions

- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Mass Balance Calculations.
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
- 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

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- 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

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

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
2. Applicable Test Procedures - Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

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

3. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

4. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing*.
 1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
 2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department

SECTION 4. APPENDIX D
Common Testing Requirements

shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
3. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard.
4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- b. *Special Compliance Tests.* When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

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

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information.
- a. The type, location, and designation of the emissions unit tested.
 - b. The facility at which the emissions unit is located.
 - c. The owner or operator of the emissions unit.
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation.
 - g. The test procedures used.
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467

Quality Shavings of South Florida, LLC Facility

Facility ID No. 0694866

PROJECT

Project No. 0694866-001-AC
Application for Initial Air Construction Permit
Project Name: Wood Chip Dryer

COUNTY

Lake County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767
DEP_CD@dep.state.fl.us

March 13, 2014

Prepared by Jeff Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210, and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. Joseph Iadisernia, Owner
Quality Shavings of South Florida, LLC
10191-b Lantana Road
Lake Worth, Florida 33467
joseph.iadisernia@gmail.com

B. Professional Engineer:

Mr. John F. Brusa, Jr., P.E.
Barton and Loguidice, P.C.
290 Elwood Davis Road
Syracuse, New York 13220
jbrusa@bartonandloguidice.com

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. Facility Contact

Mr. William Doebler IV
Project Manager
P.O. Box 686
Amherst, New York 14226
wdoebler@bartonandloguidice.com

D. Project Location:

26444 County Road 33
Groveland, FL

E. Project Summary:

This project is the Initial Air Construction Permit for the facility. The applicant will be installing an Energy Unlimited wood chip dryer, which will include a 30 MMBTU/hour burner that will be fueled by wood waste and chips from the South Florida Shavings Company processing facility. Exhaust from the burner will be ducted to a Clean Gas Systems, Inc. cyclone dust collector device prior to exhausting to the atmosphere. Based on data obtained from similar installations, the cyclone is rated at greater than 99 percent removal efficiency of particulate matter from the exhaust airstream. The process will also include a wet chip conveyor, shaving equipment, screen, dry chip conveyor, hammer mill, and bagging equipment.

G. Application Information:

Application Received on: 02/07/2014
Application determined to be complete on: 02/14/2014. (However, additional information was received on March 11, 2014.)

II. PSD Applicability for Project

The pollutant with the highest Potential to Emit is Carbon Monoxide at 79 tons per year and the potential to emit for total HAPs is 8 tons per year; therefore, no additional PSD Applicability Evaluation is necessary.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, F.A.C., as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	The facility is not a PSD major source.

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Subject to:	Y/N	Comments
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards Rule 62-296.711 – Materials Handling, Sizing, Screening, Crushing and Grinding Operations	Y	The facility is a potential source of unconfined emissions. Cyclone dust collector used to limit emissions to 5 percent opacity from dryer.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Facility is subject to standards, but the facility is a primarily a particulate source and do not anticipate significant VOC emissions. Do not anticipate significant odors from the facility.
Rule 62-296.400, F.A.C. – Stationary Source Emission Standards	N	There is no applicable category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Lake County is an attainment area for ozone
Rule 62-204.800(8), F.A.C. - Standards of Performance for New Stationary Sources (NSPS – 40 CFR 60)	N	There is no applicable source category.
Rule 62-204.800(11), F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is not a major source of particulate matter (PM) and is classified as a natural minor facility.
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	Y	Conduct visible emission test on wood chip dryer with cyclone dust collector within thirty (30) days of commencement of operation.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions* (tons/year)	Major Source Thresholds (tons/year)
CO	EU 001	78.8	100
NO _x	EU 001	64.4	100
PM ₁₀	EU 001	39.4	100
VOC	EU 001	50.5	100
SO ₂	EU 001	3.3	100
HAPs (total)	EU 001	7.7	25/10

* based on 8,760 hours of operation per year

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V. Discussion

Conduct visible emission test on wood chip dryer with cyclone dust collector within thirty (30) days of commencement of operation. According to Rule 62-296.711(3)(c), F.A.C., a visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for materials handling emissions units subject to this rule, where emissions unit is equipped with a baghouse. Even though the dryer is equipped with a cyclone instead of a baghouse, it acts as the equivalent of a baghouse since it has a particulate removal efficiency of approximately 99 percent.

The facility is classified as a natural minor facility. The burner is rated at 30 MMBTU/hr. (30 million British thermal unit per hour). It provides heat to the rotary kiln chip dryer, which is rated to process 24,500 pounds per hour. A Dryer Design Model Drawing was emailed to Jeff Rustin from William F. Doebler of Barton and Loguidice on Tuesday, March 11, 2014 (see Attachment A). The drawing indicates the maximum fuel usage for the 30 MMBTU sawdust fired solid fuel furnace (Model EU30R) is 3,750 lbs/hr. A source on the internet (http://www.balboa-pacific.com/WasteToEnergy/BTU_Values.pdf) lists the heating value for sawdust as 8,000 BTU/lb. (10 percent moisture). Multiplying the two factors together results in the 30 MMBTU/hr. rating. Based on 8,760 hour of operation and using the emission factors in Tables 1.6-1 and 1.6-2 of AP 42, the calculated potential to emit emissions are in Section IV Summary of Emissions above. The amounts are less than major source thresholds.

The VOC PTE was calculated using emission factors from AP-42 Section 10.6.2.3 – Particleboard and Plywood Manufacturing. Although the facility does not intend to process plywood or oriented strand board the use of the se emission factors represents a high estimate of VOC emissions.

VI. Federal NSPS and/or NESHAP Provisions

Not Applicable.

VII. Conclusions

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VIII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and adopted federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

project engineer at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at jeff.rustin@dep.state.fl.us or by phone at 407-897-4100.

Attachment A: equipment drawing provided on 3/11/2014

Attachment A to the Technical Evaluation and Preliminary Determination

1. Induced Draft fan and exhaust stack
2. MEC 12-40 three pass rotary drum dryer Neosho Kansas
3. 30 MM BTU sawdust fired solid fuel furnace Model EU30R
4. Maximum fuel usage 3,750 lbs/hr

