Rex Lumber, Bristol, Florida
Bristol Lumber Mill
Facility ID No.: 0770007
Liberty County

Title V Air Operation Permit Renewal

DRAFT Permit No.: **0770007-016-AV**
(Renewal of Title V Air Operation Permit No.: 0770007-012-AV)

Permitting and Compliance Authority:
State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
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Title V Air Operation Permit Renewal

Permit No.: 0770007-016-AV

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DRAFT PERMIT

PERMITTEE:
Rex Lumber, Bristol, Florida
Post Office Box 610
Bristol, Florida 32321

Permit No. 0770007-016-AV
Bristol Lumber Mill
Facility Id No. 0770007
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for Rex Lumber, Bristol, Florida. The existing Bristol Lumber Mill is located in Liberty County on Highway 12 South in Bristol, Florida. UTM Coordinates: Zone 16, 689.54 km East and 3358.88 km North; and, Latitude: 30° 20' 50" North and Longitude: 84° 59' 10" West.

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

Effective Date:
Renewal Application Due Date:
Expiration Date:

(Draft)

_____

Rick Bradburn
Air Program Administrator

RB/ha/c

Section I. Facility Information

This is a renewal of Title V permit 0770007-012-AV, effective June 10, 2008. A subsequent construction permit, 0770007-014-AC (PSD-FL-407), authorized the elongation of lumber kiln 2 and increased the maximum production capacity of all kilns from 143,000,000 to 176,000,000 board-feet per year was incorporated into the initial Title V Air Operation Permit by revision No. 0770007-015-AV, effective October 30, 2010.

Subsection A. Facility Description.

This facility consists of a log debarker, sawmill, wood waste handling and storage system, four steam heated drying kilns, planer mill, and three boilers that provide heat to the kilns. Pine logs are delivered to the facility via logging trucks and stored in the log storage yard until they are ready to be processed. The logs are debarked and conveyed into the sawmill where they are cut into various sizes of lumber. The lumber is automatically sorted by size and collected in corresponding piles that are transferred to kilns for drying. After the lumber is dried, it is transferred to the planer mill where the lumber is sized to specifications. The finished lumber is stored in miscellaneous storage sheds until it is shipped off site. The facility also receives debarked and peeled poles from Apalachee Pole Company (adjacent property owner) to be dried in the facility's drying kilns. Once dried, the poles are transported back to Apalachee Pole Company for further processing. The facility has a maximum production rate of 176,000,000 board-feet per year of lumber including 18,000,000 equivalent board-feet (1,500,000 cubic feet) per year of poles.

The facility has a total of four lumber drying kilns. The temperature and humidity inside the kilns are controlled by thermostats and/or humidifiers, which control the amount of steam going to heating coils and/or humidifiers. These units also control the opening and closing of roof vents and cycle internal axial fans so that air is either being circulated internally or supplied/exhausted through air vents. Drying cycles vary, but can be as long as 96 hours. The steam used to heat the four drying kilns is generated by three steam-producing boilers.

The facility's three Boilers (No.1, No.2 and No.3) have a maximum heat input capacity of 29.6, 42.9 and 28.7 MMBtu/hr, respectively, and are equipped with a wood gasification system. The boilers are fueled by wood waste that is generated during the processing of lumber at the facility. The fuel is conveyed using a variable speed screw conveyor into the gasifier prior to going into the boilers. Ash from Boilers No.1 and No.2 is collected by multiclones and emptied into containers located under the multiclones. Ash from Boiler No.3 is conveyed by screw conveyor to an enclosed bin for removal by front-end loader. Steam production is continuously measured and recorded on a recording chart.

Wood waste handling and storage is an unregulated emission unit and is not subject to any specific emission-limiting standard except for the general visible emissions standard of less than 20% opacity. The wood waste (bark, sawdust and shavings from the planer mill) is conveyed to one of three fuel storage silos located adjacent to the boilers to be used as fuel or conveyed to the truck loading station for shipment off site. Scrap pieces of wood generated from the lumber process are forwarded to chippers where they are chipped into smaller pieces and conveyed to the truck loading station to be shipped off site. Wood waste handling and storage consists of miscellaneous blowpipe systems, conveyors, eight receiving cyclones and storage bins.

The Department has determined that Rex Lumber is not subject to a Compliance Assurance Monitoring Plan with the applicability of 40 CFR 63 Subpart DDDD – Plywood and Composite Wood Products.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Boiler No. 1 (29.6 MMBtu/hr) and Boiler No. 3 (28.7 MMBtu/hr)
002	Boiler No. 2 (42.9 MMBtu/hr)
015	Four Steam Heated Drying Kilns
Unregulated Emissions Units and Activities	
014	Wood Waste Handling and Storage.

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. Applicable Regulations.

Based on the Title V air operation permit renewal application received October 29, 2012, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 60.48c – Reporting and Recordkeeping Requirements	001
40 CFR 63.9(b) – Initial Notification Requirements	015
62-4	Facility
62-204	Facility
62-210	Facility
62-213	Facility
62-296	Facility
62-297	Facility
62-212	Facility

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

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. 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.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed–necessary and ordered by the Department. *Nothing is deemed necessary and ordered at this time.* [Rule 62-296.320(1), F.A.C.]

FW4. General Particulate Emission Limiting Standards. General Visible Emissions Standard. 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, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

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

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 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.

e. Landscaping or planting of vegetation.

f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

g. Confining abrasive blasting where possible.

h. Enclosure or covering of conveyor systems.

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

Annual Reports and Fees

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

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the

Compliance Authority by April 1 of each year. A copy of the form and instructions may be obtained electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. 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. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA).

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

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

[40 CFR 68]

FW10. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]

FW11. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit 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. [Rule 62-210.700(1), F.A.C.]

FW12. Excess Emissions Prohibited. Excess emissions which are 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

FW13. 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.]

Section III. Emissions Unit(s) and Conditions

Subsection A. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Boiler No. 1 (29.6 MMBtu/hr) and Boiler No. 3 (28.7 MMBtu/hr)

These boilers are equipped with a wood gasification system and are fueled by wood waste generated during the processing of lumber at the facility. The fuel is conveyed using a variable speed screw conveyor into the gasifier prior to going into the boiler. Steam production is continuously measured and recorded on a recording chart.

Boiler No. 1 is manufactured by Industrial Boiler and has a maximum heat input capacity of 29.6 MMBtu/hr. Particulate emissions are controlled by two (in series) multiple tube dry collectors manufactured by Zurn, model MTSA-30-9-CYT-A. Ash collected by multiclones is emptied into containers located under the multiclones. Due to the age (built before June 1989) and size (less than 30 MMBtu/hr) of this boiler, it is subject to the visible emissions limitation in accordance with Rule 62-296.410(2)(a), F.A.C., Carbonaceous Fuel Burning Equipment.

Boiler No. 3 is manufactured by Hurst Boiler & Welding Company, model HYB-3900, and has a maximum heat input capacity of 28.7 MMBtu/hr. Particulate emissions are controlled by two (in series) multiple tube dry collectors manufactured by Hurst Boiler & Welding Company, models K12-16t and K9-44T. Ash is conveyed by screw conveyor to an enclosed bin for removal by front-end loader. Due to the age and size of this boiler (built after June 1989 and less than 30 MMBtu/hr), it is subject to the visible emissions limitation in accordance with Rule 62-296.410(2)(a), F.A.C., Carbonaceous Fuel Burning Equipment, and the fuel record keeping requirements of 40 CFR 60.48c, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum heat input for Boilers No.1 and No.3 is 29.6 and 28.7 MMBtu/hr, respectively. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation - (i.e., Fuels): These boilers shall be fueled by carbonaceous fuel (wood waste) only. Records of fuel usage for Boiler No.3 only shall be maintained and available for Department inspection. [Rules 62-4.070(3), and 62-213.410, F.A.C., and 40 CFR 60.48c]

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

Emission Limitations and Standards

A.4. Visible Emissions. Visible Emissions (VE) shall not exceed 20% opacity under normal operation except for up to two minutes in any one hour at not more than 40% opacity. [Rule 62-296.410(2)(a), F.A.C.]

Test Methods and Procedures

See Appendix TR, Facility-Wide Testing Requirements: Frequency of Compliance Tests and Operating Rate During Testing for additional details.

A.5. Emissions Tests. VE testing is required to show compliance with the standards of the Department. [Rules 62-297.310(7)(a)4 and 62-297.310(2) and (2)b, F.A.C.]

A.6. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. [Rules 62-296.410(3)(a), and 62-297.401(9)(c), F.A.C.]

Section III. Emissions Unit(s) and Conditions

Subsection B. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Boiler No. 2 (42.9 MMBtu/hr)

This boiler is equipped with a wood gasification system and is fueled by the wood waste that is generated during the processing of lumber at the facility. The fuel is conveyed using a variable speed screw conveyor into the gasifier prior to going into the boiler. Steam production is continuously measured and recorded on a recording chart.

Boiler No. 2 is manufactured by Industrial Boiler and has a maximum heat input capacity of 42.9 MMBtu/hr. Particulate emissions are controlled by two (in series) multiple tube dry collectors, manufactured by Zurn, model MTSA-30-9-CYT-A. Ash collected by multiclones is emptied into containers located under the multiclones. Due to the age and size of this boiler (built before June 1989 and greater than 30 MMBtu/hr), it is subject to the visible emissions limitation in accordance with Rule 62-296.410(2)(b), F.A.C., Carbonaceous Fuel Burning Equipment.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum heat input of the boiler is 42.9 MMBtu/hr.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

B.2. Methods of Operation – (i.e., Fuels). These boilers shall be fueled by carbonaceous fuel (wood waste) only.
[Rules 62-4.070(3) and 62-213.440(1), F.A.C.]

B.3. 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, definition of "Potential to Emit" (PTE), F.A.C.]

Emission Limitations and Standards

B.4. Visible Emissions. Visible emissions shall not exceed 30% opacity under normal operation except for up to two minutes in any one hour at not more than 40% opacity. [Rule 62-296.410(2)(b)1, F.A.C.]

B.5. Particulate Matter. Particulate Matter (PM) emissions shall not exceed 0.2 lbs/MMBtu of heat input of carbonaceous fuel. [Rule 62-296.410(2)(b)2, F.A.C.]

Test Methods and Procedures

See Appendix TR, Facility-Wide Testing Requirements: Frequency of Compliance Tests and Operating Rate During Testing for additional details.

B.6. Emissions Tests. VE and PM tests are required to show compliance with the standards of the Department.
[Rules 62-297.310(7)(a)4 and 62-297.310(2) and (2)b, F.A.C.]

B.7. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. [Rules 62-296.410(3)(a), and 62-297.401(9)(c), F.A.C.]

B.8. Particulate Matter. The test method for particulate matter shall be EPA method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rules 62-296.410(3)(b), and 62-297.401(5), F.A.C.]

Section III. Emissions Unit(s) and Conditions

Subsection C. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
015	Four (4) Steam Heated Drying Kilns

There are four lumber drying kilns. The temperature and humidity inside the kilns are controlled by thermostats and/or humidifiers, which control the amount of steam going to heating coils and/or humidifiers. These units also control the opening and closing of roof vents and cycle internal axial fans so that air is either being circulated internally or supplied/exhausted through air vents. Drying cycles vary, but can be as long as 96 hours. The steam used to heat the four drying kilns is generated by three steam-producing boilers, fueled by the wood waste generated on site. After the lumber is dried, it is transferred to the planer mill where the lumber is sized to specifications. The finished lumber is stored in miscellaneous storage sheds until it is shipped off site.

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacities. The maximum drying rate for each kiln shall not exceed the following:

a. Kiln 1: 66,000,000 board-feet per 12-month rolling period;

b. Kiln 2: 92,000,000 board-feet per 12-month rolling period;

c. Kiln 3: 9,000,000 board-feet per 12-month rolling period (equivalent to 750,000 cubic feet per 12-month rolling period); and

d. Kiln 4: 9,000,000 board-feet per 12-month rolling period (equivalent to 750,000 cubic feet per 12-month rolling period).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and 0770007-014-AC]

C.2. Hours of Operation. The hours of operation of are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and 0770007-014-AC]

C.3. Waste Wood Heating Value. During the month of July of each year, Permittee shall obtain a representative sample of waste wood fired in the boilers. The results shall be available within 45 days of taking the sample. Each representative sample shall be analyzed for moisture content (% by weight) and heating value (Btu/lb, as-fired). The actual heating value shall be determined from the most recent four analyses. The actual average heating value (as-fired), determined from the most recent four analyses, shall be used in all calculations for the heat input rates and waste wood charging rates for the boilers. The permittee shall use the following methods or other equivalent methods for sampling and analysis of waste wood: preparation of composite fuel samples (ASTM E1757); determining heat content (ASTM E711); and determining moisture content (ASTM E871).

[Rule 62-4.070(3), F.A.C., and 0770007-014-AC]

BEST OPERATING PRACTICES

C.4. Best Operating Practices for Kiln 2. Permittee shall operate Kiln 2 in accordance with the following best operating practices. (See Attachment: Kiln 2 Best Operating Practices for details.)

1. Minimize over-drying the lumber;
2. Maintain consistent moisture content for the processed lumber charge; and
3. Dry at the minimum temperature for the given lumber charge.

Permittee may change the implementation plan by submitting a request in accordance with Rule 62-213.410(2), F.A.C., at least seven days prior to implementing the change.

[Rule 62-212.400(BACT), F.A.C., and 0770007-014-AC]

RECORDS AND REPORTS

C.5. Processing Records. Within at least ten days following each calendar month, permittee shall record the following information in a written log:

a. The amount of wood dried in each kiln (board-feet) for the previous calendar month; and

b. The amount of wood dried in each kiln (board-feet) for the previous 12 calendar months of operation.

The records shall be maintained in a written (or electronic) log available for inspection by the Compliance Authority for a minimum of 5 years. [Rule 62-4.070(3), F.A.C., and 0770007-014-AC]

{Permitting Note: Permittee should use the best available data for reporting emissions from the kilns. Based on currently available data, the VOC emission factor for the kilns is 4.74 lb VOC/1000 board-feet, based on National Council for Air and Stream Improvement (NCASI) Bulletin 845 and emission factors for Formaldehyde and Methanol from the NCASI 2008 SARA Handbook. EPA recommends calculating VOC total as follows: VOC total = 3.8 lb VOC (as Carbon) per MBF + Formaldehyde + (0.36 x Methanol). Therefore, VOC total = 3.8 lb VOC (as Carbon)/MBF x 1.222 (convert carbon to Propane) + 0.01 lb Formaldehyde/MBF + 0.36 x 0.24 lb Methanol/MBF. The previous Title V permit used an emission factor of 5.36 lb VOC/MBF. However, the emissions factor of 4.74 lb VOC/MBF was computed using the more recent emissions factors for Formaldehyde and Methanol from the NCASI 2008 SARA Handbook. (See E-mail, VOC Emission Factor Discussion, from Vernon Adams to the Department, dated October 30, 2012)}

NESHAP PROVISIONS

C.6. NESHAP Subpart DDDD. The facility is subject to NESHAP subpart DDDD in 40 CFR 63. Pursuant to 40 CFR 63.2232(b), "The affected source includes lumber kilns at PCWP (Plywood and Composite Wood Products) and manufacturing facilities and at any other kind of facility." However, 40 CFR 63.2252 states that, "For process units not subject to the compliance options or work practice requirements specified in 40 CFR 63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in 40 CFR 63.9(b)." Therefore, the lumber kilns are subject to NESHAP subpart DDDD in 40 CFR 63, and permittee shall comply with the initial notification requirements in 40 CFR 63.9(b). [Rule 62-204.800(11)(b)61, F.A.C., and 0770007-014-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Combined Appendices:

Appendix A, Glossary.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

Appendix U, List of Unregulated Emissions Units and/or Activities.