FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Gilman Building Products, LLC
3823 Owens Road
Yulee, Florida 32097

Authorized Representative:
Victor H. Garrett, President

Air Permit No. 1230033-011-AC
Permit Expires:

Perry Mill
Air Construction Permit
Bark and Sawdust Silo & #2 Fuel System

This is the final air construction permit, which authorizes an update to the rule applicability, regarding visible emissions limitations for the Bark and Sawdust Silo with baghouse (EU 002) and the # 2 Fuel System with baghouse (EU 005) and the removal of the 5% opacity limit in Rule 62-297.620(4), F.A.C., and the annual visible emissions compliance test requirement from both EUs at the Perry Mill facility. These units are subject to the General Visible Emissions standard in Rule 62-296.320(4)(b), F.A.C. of less than 20% opacity. The proposed work will be conducted at 1509 South Byron Butler Parkway, Perry Mill. In Taylor County (Standard Industrial Classification No. 2421); UTM Coordinates: Zone 17, 250.7 km East and 3332.5 km North; Latitude: 30° 06' 00" North and Longitude: 83° 35' 14" West.
This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

DRAFT

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Victor H. Garrett, President, Gilman Building Products, LLC, victorgarrett@gilmanbp.com
Frank Darabi, P.E., Darabi Associates, Inc. fdarabi@darabiassociates.com

Clerk Stamp

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

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Gilman Building Products, LLC is a "Chip-n-Saw" Mill that consists of several pieces of equipment used to process Southern Yellow Pine logs into chips, bark, and graded lumber. Equipment includes one wood-fired boiler, one direct-fired kiln, two baghouses for the fuel systems, a log debarker, saw, chipper, sorter, planer, cyclones, two indirect-fired drying kilns, and a hammer mill**.**

Southern Pine logs arrive by truck and are unloaded in a log storage area prior to debarking. Debarked logs are sawed and then dried on site in the kilns. Wood wastes are fed from the saw mill into the boiler and the direct-fired kiln via silos and conveyors. The dried lumber is then planed, trimmed, and graded prior to shipment.

These emissions units are not subject to any unit specific emissions standard.

Proposed Project

This project updates the rule applicability, regarding visible emissions limitations for EU Nos. 002 and 005 and removes the 5% opacity limit in Rule 62-297.620(4), F.A.C., and the annual visible emissions compliance test requirement from both the Bark and Sawdust Silo with baghouse (EU 002) and the No. 2 Fuel System with baghouse (EU 005). These units are subject to the General Visible Emissions standard in Rule 62-296.320(4)(b), F.A.C. of less than 20% opacity. Upon incorporation of this construction permit into the facility's Title V Operation permit, EU 002 and EU 005 will be reclassified as unregulated emissions units.

This project modifies the following Emissions Units:

Facility ID No1230033	
ID No.	**Emission Unit Description**
002	Bark and Sawdust silo with Baghouse
005	# 2 Fuel System with Baghouse

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address and phone number are 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, 904-256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. Compliance Authority: The compliance authority for this project is the Northeast District Office, Compliance Assurance Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address and phone number are 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, 904-256-1700. All documents related to compliance of an emissions unit shall be submitted to the Northeast District Office.

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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
002	Bark and Sawdust silo with Baghouse
005	# 2 Fuel System with Baghouse

This permit makes the changes listed below to: Permit Nos. AC62-248334, and 1230033-002-AC

The following Specific Conditions are modified as follows:

Specific Condition No. 6 of Permit No. AC62-248334

From:

6. The maximum allowable emission rate for each of the pollutant is as follows:

POLLUTANT	EMISSIONS LIMIT			FAC RULE
	BELOW	LBS/HR	TPY	
VE [1,2]	5% Opacity	---	---	17-297.620(4)

[1] VE – Visible Emissions
[2] From silo

To:

6. <u>General Visible Emissions Standards:</u>

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, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).

[Rules 62-4.070(3), and Rule 62-296.320(4)(b)1&4 F.A.C.]

Specific Condition No. 9 of Permit No. AC62-248334

From:

9. Test the emissions for the following pollutant(s) within 45 days after startup, notify the Department 15 day prior to testing [FAC Rule 297.340(1)(i)], and submit the test report documentation to the Department with the operation permit application within 45 days after completion of the testing [FAC Rule 297.570(2)]:

POLLUTANT	TEST METHOD[1]
VE [2]	EPA 9

[1] From 17-297.330, FAC in Table 297.330-1
[2] From sawdust silo

Tests and test reports shall comply with the requirements of FAC Rule 17-297.330 and 17-297.570, respectively.

To:

9 .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.]

The Visible Emission limit and Test Method for EU 003 in Specific Condition No. 3 of Permit No. 1230033-002-AC

From:

3. The maximum operating rate and the permitted maximum allowable emission rate for each pollutant are listed in the **table below** and shall not be exceeded without prior Department approval.

   Test the emissions for each pollutant in the **table below** within 45 days after startup, notify the Department 15 days prior to testing [FAC Rule 297.340(1)(i)], and submit the test report documentation to the Department with the operation permit application within 45 days after completion of the testing [FAC Rule 297.570(2)].

   Tests and test reports shall comply with the requirements of FAC Rule 62-297.401 and 62-297.570, respectively.

   EU #002 - #3 Kiln (a direct-fired lumber kiln) that has process controlled roof vents. The burner exhausts directly into the kiln and has a safety abort stack.

   EU #003 – Fuel system which consists of a sawdust bin controlled by baghouse and a fuel hopper with a receiver cyclone.

EU	MATERIAL	RATE	POLLUTANT	Emissions Limit		FAC RULE	TEST METHOD
002	Sawdust	25.0 MMBtu/hr	VE[1]	20% opacity, except 40% opacity for 2 mins/hr		62-296.410(2)(a)	EPA9[2]
002	Lumber	140 Mbf[3]	VOC[4,5,6]	---	---	---	--
003	Sawdust	20,000 lbs/hr	VE	5% opacity[7]		62-297.620(4)	EPA 9[2]

[1] VE – visible emissions
[2] Test annually after the first test.
[3] Basis: 140,000 board feet per charge.
[4] VOC – Volatile Organic Compounds
[5] VOC emissions rate in the application is 99.60 TPY from EU #002 and is based emissions factor (3.32 lbs/Mbf) & 60,000 Mbf/yr where MBf= 1000 board feet. Hours of operation shall be limited to 24 H/D, 7 D/W, 52 W/Y (8760 H/Y) and shall be recorded.
[6] VOC emitted shall be determined by recording each kiln charge rate in board feet per day. Submit a report containing the data required for a 30 day period beginning within 45 days after startup.
[7] From the sawdust bin controlled by a baghouse. The fuel hopper receiver cyclone emissions are insignificant.

To:

3. <u>General Visible Emissions Standards:</u>

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, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).

[Rules 62-4.070(3), and Rule 62-296.320(4)(b)1&4 F.A.C.]

4. <u>Special Compliance Tests:</u> 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.]