TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Gilman Building Products, LLC
3823 Owens Road,

Yulee, Florida 32097.

Perry Mill
Facility ID No. 1230033

PROJECT

Project No. 1230033-011-AC
Revision to Construction Permit Nos. AC62-248334, and 1230033-002-AC

COUNTY

Taylor

PERMITTING AUTHORITY

State of Florida
Department of Environmental Protection

Northeast District Office
Waste and Air Resource Management
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256
Telephone: (904) 256-1700
Fax: (904) 256-1587

October 09, 2013

1. 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.

Facility Description and Location

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.

The existing facility is a lumber wood processing facility standard industrial classification (SIC) code (2421). The existing Perry Mill is located in Taylor County at 1509 S. Byron Butler Parkway, Perry, Florida 32348. The UTM coordinates are Zone 17, 470.98 km East and 3296.85 km North. UTM Coordinates: Zone 17, 250.7 km East and 3332.5 km North; Latitude: 30° 06' 00" North and Longitude: 83° 35' 14" West.

Facility Regulatory Categories

Based on the application received August 05, 2013,

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.

State Requirements

The Bark and Sawdust Silo with baghouse (EU 002) and the # 2 Fuel System with baghouse (EU 005) are not subject to an unit-specific rule that establishes a particulate matter emission standard, but are subject to the General Visible Emissions standard in Rule 62-296.320(4)(b), F.A.C. of less than 20% opacity.

The facility may be required to perform a visible emissions compliance test when the Department believes that the general visible emissions standard is being violated in accordance with Chapter 62-297.310(7)(b), Special Compliance Tests.

Project Description

The Department is co-issuing a draft air Construction Permit, No. 1230033-011-AC, to update the rule applicability, regarding visible emissions limitations for EU Nos. 002 and 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 and added as unregulated emissions units in Appendix U-1 of Permit No.1230033-010-AV.

Processing Schedule

August 05, 2013	Application for Title V Air Operation Permit Renewal
September 12, 2013	Applicant's supplied data received
September 16, 2013	Determination for Concurrent Processing of Air Construction Permit & Title V Air Operation Permit Renewal

2. PSD & TITLE V SOURCE APPLICABILITY

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum

refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The facility is a major stationary source since it is one of the 28 categories listed in Rule 62-210.200 (194), F.A.C. - Kraft pulp mills, and has the potential to emit more than 250 tons per year of PSD pollutant (VOC).

This project is not subject to PSD preconstruction review requirements since the proposed project itself will not result in an increase emissions.

3. APPLICATION REVIEW

Bark and sawdust silo with baghouse (EU 002)
2 fuel system with baghouse (EU 005)

The Department is co-issuing a draft air Construction Permit, No. 1230033-011-AC, to update the rule applicability, regarding visible emissions limitations for EU Nos. 002 and 005.

Applicant supplied data dated September 12, 2013 estimates a potential PM emissions of 13.14 TPY for the Bark & Sawdust Silo with baghouse (EU 002) and 5.26 TPY PM estimated emissions for the #2 Fuel System with baghouse (EU 005).

These emissions units are not subject to a unit-specific rule that establishes a particulate matter emission standard, the established 5% opacity limitation (Rule 62-297.620(4), F.A.C.) is not applicable. EU 002 and EU 005 are subject to the General Visible Emissions standard in Rule 62-296.320(4)(b), F.A.C. of less than 20% opacity. According to Rule 62-210.900(1), F.A.C. the General Visible Emissions standard is defined as a facility-wide limitation. As such, it should not be included as a specific condition for an emissions unit unless the emissions unit is also subject to the Process Weight Table in Rule 62-296.320(4)(a), F.A.C.

The facility will not be required to perform a visible emissions compliance test at each emissions unit annually or prior to permit renewal. The Department may require that the owner or operator conduct a visible emissions compliance test when the Department believes that the general visible emissions standard is being violated in accordance with Chapter 62-297.310(7)(b), Special Compliance Tests~~,~~ determine compliance with the general visible emissions standard. (DARM-PER-33 March1, 2000)

Emissions Unit (EU) Classification

Upon final issuance of this construction permit, EU 002 and EU 005 will not be required to perform a visible emissions compliance test at each emissions unit annually or prior to permit renewal. The units will be reclassified as unregulated emissions units in the Title V Operation Permit, Appendix U.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and 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. Yasmin K. Enriquez is the project processor responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project processor at the Northeast District Office. The Florida Department of Environmental Protection, Northeast District Office, Waste and Air Resource Management Program, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: 904-256-1700.