FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

OWNER: Georgia-Pacific, LLC
PERMITTEE:
Slaughter Fibers, Inc.
104 Macon Road
Palatka, Florida 32177

Permit/Cert Number: 1230059-006-AO
Date of Issue: September 5, 2014
Expiration Date: September 5, 2019

Authorized Representative:
Mr. Clint Slaughter, CEO

Project: Initial Air Operation Permit

PROJECT AND LOCATION

This is the initial operation permit authorizing the operation of the Foley Chip Mill, which is a Hardwood Chip Mill (Standard Industrial Classification No. 2421), and incorporating construction permits 1230059-002-AC and 1230059-003-AC. The facility is located in Taylor County at 3979 Stone Container Road, Perry, Florida. The UTM coordinates are Zone 17, 256.4 km East, and 3330.7 km North.

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.

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.

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 Notice of Issuance 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 September 5, 2014 to the persons listed below.

Mr. Clint Slaughter, CEO, Slaughter Fibers, Inc. (slaughterfibers@gmail.com)
Mr. Ralph Sevearance, Manager – Chip Mills, Georgia-Pacific, LLC (rtsevear@gapac.com)
Mr. Philip D. Cobb, P.E., Golder Associates, Inc. (pcobb@golder.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.

_____ September 5, 2014
(Clerk) (Date)

FACILITY DESCRIPTION

The Foley Chip Mill consists of a log yard, sawing, and debarking operations, chipping operations, and chip and bark handling. All energy consuming equipment at the facility are operated exclusively by electrical power, except that the facility is allowed the use of a portable gasoline /diesel fuel powered generator only during periods when electrical power supplied to the mill is temporarily interrupted. The facility estimates such interruptions to result in the generator being operated for no more than 504 hours per year in a typical year.

The Foley Chip Mill receives whole, hardwood logs and processes them into wood chips and hogged bark. Logging trucks deliver whole logs to the facility where they are placed into storage using a clamshell crane. When they are ready to be processed, the whole logs are loaded onto the log conveyor where they are cut to the appropriate length by a sizing saw. The sized logs are conveyed to the debarker where the bark is removed from the logs. The debarked logs are conveyed on the chipper infeed conveyor to the chipping saw, where the logs are reduced into wood chips suitable for use in a pulp mill. The chip outfeed conveyor loads the chips onto railcars, or when the rail operation is shutdown, onto transport trucks, for offsite distribution. Bark from the debarker is conveyed to the hogger and then conveyed to a truck loadout station for shipment by truck.

The maximum annual raw log throughput rate is 1,314,000 tons per year (TPY), based on the debarker design of 150 tons per hour (TPH) and operation for 8,760 hours per year. The maximum annual bark production rate is 183,960 TPY, based on 14 percent of a log being bark. The maximum annual chip production is 1,130,040 TPY, based on the chipper design of 129 TPH, the annual log consumption of 1,314,000 TPY, and based on 86 percent of a log being wood. The bark hogger has a design capacity of 21 TPH. The facility operates continuously, 8,760 hrs/yr.

The facility sends the bark generated by the debarking operations to the Buckeye Foley Pulp Mill, although the bark could go to other users. All of the wood chips generated by the chip mill operation are sent to customers other than the Buckeye Foley Pulp Mill, as the Foley Chip Mill processes only hardwoods, and the Buckeye Foley Pulp Mill only uses softwood in its pulping operation.

Temporary Portable Generator: The temporary 200 kW portable generator is classified as a mobile non-road compression ignition (CI) reciprocating internal combustion engine (RICE) pursuant to the definition in 40 CFR 1068.30 and therefore is not subject to the requirements of 40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The facility anticipates an hourly gasoline/diesel fuel usage rate for the temporary portable generator of a maximum of 6.0 gallons per hour, with an annual usage rate of 3,020 gallons based on an estimated 504 hours of operation due to interruptions. This annual estimated usage rate is below the 64,000 gallons threshold in the conditional exemption of Rule 62-210.300(3)(a)35., F.A.C. The engine therefore meets the categorical exemption rule 62-210.300(3)(a)35., F.A.C.

The fuel usage in the engine is to be included in the recordkeeping requirements of the facility.

The existing facility consists of the following permitted emissions units.

Facility ID No. 1230059	
EU ID No.	Emission Unit Description
001	Hardwood Chip Mill - 0.25 TPH Sizing Saw - 150 TPH Log Debarker - 21 TPH Bark Hog - 129 TPH Wood Chipper

FACILITY REGULATORY CLASSIFICATIONS

- 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 not** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year, and individual and total hazardous air pollutants are less than 10 and 25 tons per year, respectively in accordance with Chapter 62-210, F.A.C.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department:

Application for Air Permit – Non-Title V Source received September 2, 2014.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number (904) 256-1700.

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. Construction Permit Required. Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

   [Rule 62-210.300(1)(a), F.A.C.]

8. Application for Non-Title V Operation Permit Renewal: A completed Application for Air Permit –Non-Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

   [Rules 62-4.030, 62-4.055, 62-4.220, 62-210.300(1)(a), and 62-4.210.300(2), F.A.C.]

9. The ID Number and Project Name for this source shall be used on all correspondences.

A. Facility-Wide Conditions

A.1. 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. The permittee shall conduct a visible emissions compliance test upon request by the Department in accordance with the requirements of Rule 62-297.310 (7)(b), F.A.C. [stated in Condition 4.b of Appendix D Common Testing Requirements]. The test Method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rule 62-296.320(4)(b)1, F.A.C.]

A.2. Unconfined Particulate Emissions: The permittee shall take reasonable precautions to control unconfined emissions from the operations at the Foley Chip Mill. 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 at this facility may include, but are not limited to the following:

a. Maintenance of paved roads as needed.

b. Application of water or other dust suppressants to unpaved roads, yards, open stock piles under the control of the owner or operator of the facility to prevent reentrainment, and from work areas to prevent particulate from becoming airborne.

c. Vehicles shall be restricted to slow speeds on the plant site

d. Landscaping and planting of vegetation.

e. Regular mowing of grass and care of vegetation.

f. Limiting access to plant property by unnecessary vehicles

g. Use of enclosed material transfer points where feasible.

h. Minimizing drop distances of dry materials when handling.

[Rule 62-296.320(4)(c), F.A.C.; Permit No. 1230059-002-AC]

B. EU001 – Hardwood Chip Mill

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Hardwood Chip Mill - 0.25 TPH Sizing Saw - 150 TPH Log Debarker - 21 TPH Bark Hog - 129 TPH Wood Chipper
Exempt Emissions Unit	
	200 kW Temporary Portable Generator to be operated only during periods of temporary electrical power interruptions

{Permitting note: This emissions unit is regulated under: Rule 62-296.320, F.A.C. – General Pollutant Emission Limiting Standards.}

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity. The Foley Chip Mill is authorized to process only hardwood logs.

a. Log Throughput Rate: The estimated design capacity of the Foley Chip Mill is based on an annual log throughput of 1,314,000 tons during any consecutive 12-month period.

b. Bark Production Rate: The estimated bark production rate at the Foley Chip Mill is 183,960 tons during any consecutive 12-month period. [1]

c. Wood Chip Production Rate: The estimated wood chip production by the Foley Chip Mill is 1,130,040 tons during any consecutive 12-month period. [2]

[1] Based on 14 percent of the estimated log throughput to the Foley Chip Mill and 150 TPH design capacity of the Log Debarker, 8,760 hours of operation.

[2] Based on 86 percent of the estimated log throughput of the Foley Chip Mill and 129 TPH design capacity of the Wood Chipper, 8,760 hours of operation.

[Rule 62-204.800, 62-212.200(PTE), F.A.C., Permit No. 1230059-002-AC]

B.2. Hours of Operation: The hours of operation of this emissions unit is not limited (8,760 hours per year).

[Rules 62-4.070(3), 62-210.200(PTE), F.A.C.; Permit No. 1230059-002-AC]

B.3. Methods of Operation- Authorized Fuel. No fuels are authorized for the equipment used in the Foley Chip Mill operations except during periods when electrical power to the facility has been temporarily interrupted. During normal operation, there shall be no fuel combustion units operating at the facility and all energy consuming equipment shall be electric. During periods when electrical power to the facility has been temporarily interrupted, a portable rental generator of up to 200 kW may be brought on site for temporary operation.

[Permit No. 1230059-003-AC; Rules 62-4.070, 62-210.200(PTE), F.A.C.]

NOTIFCATION, RECORDKEEPING AND REPORTING REQUIREMENTS

B.4. Log Throughput: The Permittee shall record and maintain records of the actual quantity (tons) of logs processed at the Foley Chip Mill during at least each calendar month. The Permittee shall determine a rolling, consecutive 12-month total from the monthly data. These records shall be kept onsite for a period of three years following the date of such record and available to Department personnel upon request.

[Rule 62-4.070, F.A.C.]

B.5. Notification of Temporary Portable Generator Operation: The Permittee shall submit to the Compliance Authority written or electronic notification of the dates that the temporary portable generator begins operation and completes operation at the site. This notification shall include:

1. Manufacturer name and date of manufacture
2. Model No.
3. Power rating kW/hp
3. Quantity of gasoline or diesel fuel combusted while located at the site
4. The total number of hours of operation at the site.

[Rule 62-4.070, F.A.C.]