



**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

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Revision by:

Mr. James Brody, Vice President Lumber Operations
Georgia Pacific Wood Products, LLC
133 Peachtree Street NE
Atlanta, Georgia 30303

FINAL Permit No. 0290003-010-AV
Cross City Chip N Saw
Dixie County

Enclosed is the FINAL Permit, No. 0290003-010-AV, for the Title V Air Operation Permit Renewal. The facility is located in Dixie County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There **were no** comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit revision) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice 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

RSR: rfs

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on **July 23, 2014** to the person(s) listed or as otherwise noted:

Mr. James Brody, Vice President Lumber Operations, Georgia Pacific Wood Products, LLC
(jim.brody@gapac.com)

Mr. Mike H. O'Brien, Georgia Pacific Wood Products, LLC (MHOBRIEN@gapac.com)

Ms. Barbara Friday, DEP DARM: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp

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



(Clerk)

07/23/14
(Date)

FINAL Determination

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

Comments were received from Mr. Mike O'Brien on behalf of the applicant on June 30, 2014.

The following permit sections are revised as indicated. Strikethrough is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

- 1. Section III, Subsection A.7., 2nd paragraph, 1st sentence: Should modify to read Georgia-Pacific Wood Products LLC.**

Response: Based on the comment, the 1st sentence in the 2nd paragraph of Condition A.7. is corrected as follows:

Only "on-specification" used oil generated at the Georgia-Pacific Corporation Wood Products LLC, Cross City Chip N Saw shall be used for waste oil disposal. "On-specification" used oil is defined as each used oil delivery that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below.

- 2. Section III, Subsection A.9., 2nd sentence: Request modification to read – *The owner or operator shall conduct test, while the emission unit is operating, to demonstrate compliance with the VE limit during each federal fiscal year (October 1- September 30).***

Response: No change is made to the permit condition language. However, please refer to Department's Guidance Document Number DARM-OGG-19. Guidance Regarding Temporary Facility/Emissions Unit Shutdown and Start-Up (<http://www.dep.state.fl.us/air/rules/guidance/ogg19.pdf>).

- 3. Section III, Subsection A.13., 1st sentence: Request modification to read- *While the emission unit is operating, the owner or operator shall maintain the following records and retain them on site for five years:***

Response: No change is made to the permit condition language. Please see Response to Item 2 above.

- 4. Appendix RR, Subsection RR4, Semi-Annual monitoring Reports: Georgia-Pacific requests a waiver of Semi-annual Monitoring Reports for periods in which the facility/emission units are not in operation. The facility will continue to submit Annual Operating Reports, Annual Statement of Compliance, and EAOR Title V Annual Emissions Fee Payment.**

Response: The cited rule, Rule 62-213.440(1)(b)3.a., F.A.C., states that each permit shall incorporate the submittal of reports of any required monitoring at least every 6 months, and that all instances of

deviations from permit requirements must be clearly identified in such reports. As such, no change is being made to Condition RR4. of Appendix RR- Facility Wide Reporting Requirements.

The required reports are to be submitted to the Compliance Authority. Should the facility or emission unit(s) within the facility not be in operation during any time period within the 6 month period covered by the report, the report should include at least a statement that describes the facility/EU operational status as the reason for no reported data. Please contact the Compliance Authority for preferred formatting.

- 5. Appendix TR, Subsection TR7, Frequency of Compliance Tests: Georgia-Pacific requests clarity that an annual Visible Emissions Compliance Test (as noted in Condition A.9.) is not require if the facility/emission unit is not operating.**

Response: Please see Response to Item 2 above.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit No. 0290003-010-AV. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

DARM-OGG-19

To: District Air Program Administrators
Local Air Program Administrators
Trina Vielhauer, BAR Chief
Sandra Veazey, BAMMS Chief
Larry George, OPAPM Program Administrator
Pat Comer, Assistant General Counsel

From: Joseph Kahn, Director 
Division of Air Resource Management

Date: April 22, 2010

Subject: Guidance Regarding Temporary Facility/Emissions Unit Shutdown and Start-up

Due to the current economic climate, there seem to be many permitted facilities that have temporarily shut down one or all of their emissions units. The purpose of this guidance is to review what is currently recommended in these situations.

Timely Compliance Tests

It is recommended that you not require a shutdown emissions unit to start-up in order to perform a compliance test by its due date, even if other parts of the facility are in operation. Please use practical and reasonable judgment in evaluating each situation. For instance, even if there is activity at a concrete block plant but the cement silo itself is too full to accept a load of cement, the facility cannot be reasonably expected to test the filling of the silo for visible emissions until business improves and requires that a load of cement be delivered.

If an emissions unit is not timely tested because it was shutdown, or missed any periodic compliance tests required for the period it was shutdown, the emissions unit should be tested as soon as practicable but no later than 30 days after start-up.

If an emissions unit was timely tested prior to its being shutdown, and did not miss any periodic compliance tests required for the period it was shutdown, it is not required to be tested again within 30 days of start-up just because it has started back up. Testing can wait until the next time a compliance test would regularly be due.

The following examples are intended to illustrate this guidance for common situations.

Example 1. An emissions unit is required to have its visible emissions tested once every calendar year but the emissions unit was taken out of operation in October of 2008 **without having been tested** in 2008. If the emissions unit was placed back in operation on April 1, 2009, it should be tested for visible emissions as soon as practicable but no later than April 30, 2009.

Example 2. An emissions unit is required to have its visible emissions tested once every calendar year and the emissions unit was taken out of operation in October of 2008 **after having its visible emissions tested** on October 1, 2008. If the emissions unit was placed back in operation on April 1, 2009, it just needs to be tested again by December 31, 2009 because no required test was missed.

Example 3. An emissions unit is required to have its visible emissions test once every calendar year and the emissions unit was taken out of operation in October of 2008 **after having its visible emissions tested** on October 1, 2008. If the emissions unit was not placed back in operation until April 1, 2010, it should be tested as soon as practicable but no later than April 30, 2010 because it missed the 2009 annual test.

Please note, the requirements of Rule 62-297.310(7)(b), F.A.C., Special Compliance Tests, apply if the Department has found a good reason, such as questionable maintenance of control equipment.

ARMS

To prevent an emissions unit's compliance test(s) from showing up as overdue in ARMS, and to help with the review of Title V emissions fees, the date the emissions unit was temporarily shutdown should be entered in ARMS as the "Long-Term Reserve Shutdown Dt". Do not change the emissions unit status code to "I" (for Inactive) unless the emissions unit has been permanently shut down and the permit revised or surrendered accordingly.