Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Southern Fuelwood, Inc.
28826 Newberry Road
Newberry, FL 32669

Air Permit Number: 0010126-004-AO
Issue Date: July 25, 2011
Expiration Date: August 28, 2014

Authorized Representative:
Pat Post, Owner

Southern Fuelwood
Non-Title V Air Operation Permit
Permit Revision

PROJECT AND LOCATION

This is the air operating permit revision, which authorizes the incorporation of permit No.00101-003-AC for the reduction in hours of operation for the Firewood Shavings Dryer (EU001) from 8760 hours/year to 5000 hours /year; and the operation of a non-relocatable air curtain incinerator (EU 002) into permit No. 0010126-002-AO.

The facility is a Miscellaneous Wood Products Manufacturer (Standard Industrial Classification No. 2499). The facility is located in Alachua County at 28826 W. Newberry Road in Newberry, Florida. The UTM coordinates are Zone 17, 340.74 km East; and 3280.56 km N.

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 operation 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 operate the facility in accordance with the conditions 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.

Christopher L. Kirts, P. E.
District Air Program Administrator

7/25/2011
Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice 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 July 25, 2011 to the persons listed below.

Veronica Sgro, P.E Koogler and Associates Inc. vsgro@kooglerassociates.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.

(Clerk)

7/25/11
(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a wood shavings manufacturing facility that consists of a wood-fired shavings dryer and a non-relocatable air curtain incinerator (ACI).

The Fire wood Shavings drying operation burns sawdust as fuel consist of a shaving dryer, shavings mill, a 12.5 MMBtu sawdust burner, screen, storage bins and a cyclone for the control of emissions. The non-relocatable Air Curtain Incinerator manufactured by Air Burners, LLC, Model: S-327 is an above ground refractory lined firebox which is approximately 27 feet long, 8.5 feet wide and 8 feet deep; is powered by an 85 HP Kubota Industrial Diesel Engine (Model No: V3600-TE). The ACI is authorized to burn only untreated fuelwood waste, from the fuelwood making operation at the facility. Wastes include end cuts and defective pieces.

Shavings produced at the facility are fed through a dryer to reduce the moisture. The sawdust is separated from the dried shavings by a screen, then stored in a bin, and feed to the combustion zone by an auger. The dryer temperature typically varies between 400 °F and 600 °F. This is a continuous drying process and the residence time of the shavings in the dryer is approximately one minute. The dryer is fired using sawdust as fuel. The typical production rate of dry shavings is approximately 2.5 tons/hour. The production rate is determined on a monthly basis based upon inventory records. The maximum heat input rate for the burner is estimated to be 12.5 MMBtu/hr, based on 2500 lbs of sawdust burned per hour with a heat value of 5000 Btu/lb.

The facility consists of the following emissions units:

Facility ID No. 0010126	
ID No.	**Emission Unit Description**
001	Wood Fired Shavings Dryer Operation with cyclone
002	Air Curtain Incinerator

FACILITY REGULATORY CLASSIFICATION

- 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.

Applicable Unit Specific Rule (s)

Wood Fired Shavings Dryer Operation is subject to the requirements of Rule 62-296.410, F.A.C. for Carbonaceous Fuel Burning Equipment

Air Curtain Incinerator is subject to the requirements of 40 CFR 60, Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which Construction is Commenced after November 30, 1999 or for which Modification or Reconstruction is commenced on or after June 1, 2001.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 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;
   d. Appendix D. Common Testing Requirements
   e. Appendix E. NSPS Subpart A. General Provisions

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the 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, 62-296 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: 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. A completed **Application for Non Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), 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.

   [Rule 62-4.090, F.A.C.] [Rules 62-4.055 and 62-4.220, F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS
A. Wood Shavings Dryer System EU No. (001)

The following specific conditions apply to the Emissions Units listed below:

EU No.	Emission Unit Description
001	Wood Shavings Dryer Operation With Cyclone

EQUIPMENT

A.1. **Wood Shavings Dryer System**: The permittee is authorized to operate a Wood Shavings Dryer System that consists of a 2.5 TPH wood shavings Dryer fired by a 12.5 MMbtu Sawdust Burner. A cyclone controls particulate emissions from the wood shaving process.

[Air Construction Permit No. 0010126-001-AC]

PERFORMANCE RESTRICTIONS

A.2. **Restricted Operation**: The hours of operation are restricted to no more than 5000 hours /year.

[Rules 62-4.070(3), 62-210.200(PTE), F.A.C. and Permit No. 0010126-003-AC]

A.3. **Method of Operation- Fuel**: The burner is carbonaceous (sawdust) fired.

[Rule 62-210.200(73), F.A.C. and Permit No.0010126-001-AC]

A4. **Maximum Heat Input Rate**: The maximum heat input rate shall not exceed 12.5 MMBtu/hour.

[Rules 62-4.160(2)&(14)(b), 62-210.200(PTE), F.A.C. and Permit No.0010126-001-AC]

A.5. **Control Device**: The cyclone shall be maintained in good operating condition and shall remain in place at all times during operation. If there is a malfunction on the control unit, the owner or operator shall immediately take corrective actions to minimize emissions.

[Rule 62-4.070(3) F.A.C]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS:

A.6. **Visible Emissions Limit**: Visible emissions shall not exceed 20 percent opacity except for 40 percent opacity for not more than 2 minutes in any one hour.

[Rule 62.296.410(2)(a), F.A.C. and No.0010126-001-AC]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

A.7.**Test Methods and Procedures**: All emissions tests performed shall comply with the following requirements.

a) The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.
b) Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.410 (3), F.A.C.]

A.8. **Compliance Testing Frequency**: Subsequent visible emissions tests shall be conducted each federal fiscal year (October 1 – September 30).

[Rule 62-297.310 (7)(a), F.A.C. and No.0010126-001-AC]

A.9.**DEP Method 9- Required Sampling Time**: The required minimum period of observation for each compliance test shall be thirty (30) minutes (five 6-minute averages). The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rule 62-297.310(4) (a) 2. F.A.C.]

NOTIFICATION, RECORDKEEPING AND REPORTING REQUIREMENTS

A.10.**Recordkeeping**: The Owner or operator shall record the following data:

a) Daily hours of operation of the emissions unit, total hours of operation for the month, and 12 consecutive months running total.
b) Monthly production rate of dried shavings.
c) Monthly VOCs, individual HAP and total HAPs emissions.
d) Total estimated emissions of VOC, Individual HAP and Total HAPs per 12-consecutive months.
e) Copy of all calculations and supporting documents for VOC and HAP emission rate estimations.

[Permit No.0010126-001-AC]

A.11.**Control Device Maintenance and Malfunction Record**: The cyclone shall be inspected and maintained in accordance with the recommendations developed for the equipment by the vendor. Inspection and maintenance documentation shall be retained at the facility for at least 5 years and made readily available for inspection by the Department. Documentation shall include, but is not limited to the following:

a. Inspection and maintenance of the cleaning system to minimize particulate buildup
b. Date observations and maintenance were performed;
c. Date and type of malfunctions that occurred.
d. Duration of the malfunction and correction action taken.
e. Maintenance conducted on as a result of malfunction

[Rule 62-4.070(3) 62-210.700(1), F.A.C]

A.12. **Annual Operating Report**: The Permittee shall complete and submit the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5) each year to the NED Air Program Office by April 1 of the following year.
If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to the NED local air program office.

[Rule 62-210.370(3) F.A.C.]

A.13. **Record Retention**: All the measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least three (3) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request.

[Rule 62-160(14)b., F.A.C. and Permit No.0010126-002-AO]

B. Air Curtain Incinerator EU No. (002)

The following specific conditions apply to the Emissions Unit listed below:

ID No.	Emission Unit Description
002	Air Curtain Incinerator

EQUIPMENT

B.1. **Air Curtain Incinerator**: The permittee is authorized to operate an above ground refractory lined non-relocatable S-327 Air Curtain Incinerator.

[Air Construction Permit No. 0010126-003-AC]

PERFORMANCE RESTRICTIONS

B.2. **Permitted Capacity**: The maximum charging rate of the unit is 10 tons/hour.

[Rule 62-210.200(PTE) and 62-4.070(3), F.A.C. and Air Construction Permit No. 0010126-003-AC]

B.3. **Restricted Operation**: The hours of operation are restricted to no more 2000 hours per 12 consecutive months and **shall** be recorded.

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C., Air Construction Permit No. 0010126-003-AC]

B.4. **Material**: The unit is authorized to burn only untreated fuel wood waste, from the fuel wood making operation at the facility. Wastes include end cuts and defective pieces. The burning of yard trash is prohibited.

[Air Permit No. 0010126-003-AC]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS:

B.5. **Permitted Open Burning**: Open burning is allowed only if such burning is conducted using a Department-permitted ACI operated in compliance with the requirements of this permit.

[Rule 62-296.320(3) and 62-256.700, F.A.C.]

B6. **Maximum Opacity Limitations**: Within 60 days after the air curtain incinerator reaches the maximum charging rate at which it will operate, but no later than 180 days after its initial startup, the owner or operator shall meet the two limitations specified in paragraphs (1) and (2) of this condition.

(1) The opacity limitation is 10 percent (6-minute average), except as described in paragraph (2) of this condition.
(2) The opacity limitation is 35 percent (6-minute average) during the startup period that is within the first 30 minutes of operation.

[40 CFR 60.2250 (a), Rule 62-296.401 (7)(b)1, F.A.C.]

B.7. Except during malfunctions, the visible emissions limits apply at all times, and each malfunction must not exceed 3 hours. The general excess emissions rule, Rule 62-210.700, F.A.C., shall not apply.

[40 CFR 60.2250 (b) and Rule 62-296.401 (7)(b)1, F.A.C.]

B.8. The owner or operator shall comply with the applicable requirements of 40 CFR 60, Subpart A- General Provisions (see attached Appendix E of the permit).

[40 CFR 60.1 (a)]

WORK PRACTICE STANDARDS

B.9. **Prohibited Materials**: Except as provided herein and at specific condition No. B.10, the only materials that shall be burned in the air curtain incinerator are untreated fuel wood waste, excluding sawdust. The air curtain incinerator shall not be used to burn any biological waste, hazardous waste, asbestos-containing materials, mercury-containing devices, pharmaceuticals, tires, rubber material, residual oil, used oil, asphalt, roofing material, tar, treated wood, plastics, garbage, trash or other material prohibited to be open burned as set forth in subsection 62-256.300(2), F.A.C. Only kerosene, diesel fuel, drip-torch fuel (as used to ignite prescribed fires), untreated wood, virgin oil, natural gas, or liquefied petroleum gas shall be used to start the fire in the air curtain incinerator. The use of used oil, chemicals, gasoline, or tires to start the fire is prohibited.

[Rule 62-296.401 (7)(b)3, F.A.C. and Air Construction Permit No. 0010126-003-AC]

B10. Notwithstanding the provisions of Specific Condition No. B.9, the air curtain incinerator may be used for the destruction of animal carcasses in accordance with the Rule 62-256.700(6), F.A.C. When using an air curtain incinerator to burn animal carcasses, untreated wood may also be burned to maintain good combustion.

[Rule 62-296.401 (7)(b)4, F.A.C.]

B.11. In no case shall the air curtain incinerator be started before sunrise. All charging shall end no later than one (1) hour after sunset. After charging ceases, air flow shall be maintained until all material within the air curtain incinerator has been reduced to coals, and flames are no longer visible. A log shall be maintained onsite that documents daily beginning and ending times of charging.

[Rule 62-296.401 (7)(b)5, F.A.C.]

B.12. The air curtain incinerator shall be attended at all times while materials are being burned or flames are visible within the incinerator.

[Rule 62-296.401 (7)(b)6, F.A.C.]

B.13. The air curtain incinerator shall be located at least fifty (50) feet from any wild lands, brush, combustible structure, or paved public roadway.

[Rule 62-296.401 (7)(b)7, F.A.C.]

B.14. **Material Loading**: The material shall not be loaded into the air curtain incinerator such that it protrudes above the air curtain.

[Rule 62-296.401 (7)(b)8, F.A.C.]

B.15. **Ash Build-up**: Ash shall not be allowed to build up in the pit of the air curtain incinerator to higher than one third (1/3) the pit depth or to the point where the ash begins to impede combustion, whichever occurs first.

[Rule 62-296.401 (7)(b)9, F.A.C.]

B.16. **Operation And Maintenance:** An operation and maintenance guide shall be available to the operators of the air curtain incinerator at all times, and the owner shall provide training to all operators before they work at the incinerator. This guide shall be made available to the Department or for an inspector's onsite review upon request.

[Rule 62-296.401 (7)(b)10, F.A.C.]

TESTING REQUIREMENTS

B.17. **Annual Compliance Test**: The owner or operator shall conduct annual tests no more than 12 calendar months following the date of the previous test.

[40 CFR 60.2255 (c) and Rule 62-296.401 (7)(d)1, F.A.C.]

B.18. **Compliance Test Method**: The reference test method for opacity shall be EPA Method 9, as described at 40 CFR Part 60, Appendix A, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

[40 CFR 60.2255 (a) and Rule 62-296.401 (7)(c)1, F.A.C.]

B.19. **Permitted Capacity**: Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operation does not exceed 100 percent of the maximum operation rate allowed by the permit. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2), F.A.C.]

NOTIFICATION, RECORDS AND REPORTS

B.20. **Compliance Test Report Submittal**: The owner or operator shall submit the results (each 6-minute average) of the annual opacity test within 12 months following the previous report. Annual opacity test reports shall be submitted as electronic or paper copy on or before the applicable submittal date.

[40 CFR 60.2260 (d) & (e), and Rule 62-297.310(8), F.A.C.]

B.21. **Record Keeping**: The owner or operator shall keep the following records onsite and shall be made available to the Department or for an inspector's onsite review upon request:

a) The results of all initial and annual opacity tests onsite in either paper copy or electronic format, unless the Department approves another format.
b) Daily hours of operation for the unit, total hours of operation for the month, and 12 consecutive months running total.

[40 CFR 60.2260 and Rule 62-4.070(3), F.A.C.]

B.22. **Record Retention**: The owner or operator shall keep records as described by specific condition No. B.21, for at least 5 years.

[40 CFR 60.2260 (b) and Rule 62-4.070(3), F.A.C.]

SOLID WASTE CONDITIONS (i.e. conditions provided by the Department's Solid Waste Section)

In addition to the rules and regulations that the air portion of the permit is issued under, the solid waste portion of the permit is issued under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-701 and 62-709.

B.23. **Access Control**: The facility shall control access to the facility and shall maintain the access control structures such as the field fence and gate.

[Rule 62-701.803 (7), F.A.C.]

B.24. **Access Control**: There shall be an all-weather access road, at least 20 feet wide, all around the perimeter of the site, none of the processed or unprocessed material shall be more than 50 feet from access by motorized firefighting equipment.

[Rule 62-709.320(2)(a)(c) F.A.C]

B.25.**Non-authorized Activities:**

a. This permit does not authorize any waste disposal activities; no waste storage shall be within the seasonal high or low groundwater table. [Rule 62-701.300(2)(e), F.A.C.]

b. No waste shall be placed within 100 feet of any existing or approved off-site potable water well; no setback is required from on-site water well. [Rule 62-701.300(12) (a), F.A.C.]

c. No waste shall be placed within 50 feet of any natural or artificial body of water, including wetlands within the jurisdiction of the Department, except bodies of water contained completely within the property boundaries of the disposal site and that do not have a discharge.

[Rule 62-701.300(12) (b), F.A.C.]

B.26.**Handling and Removal of Prohibited Waste**: The facility shall remove prohibited waste from the waste being discharged and shall remove it to covered roll-off containers upon discovery. Any containers containing putrescible waste shall have its contents removed within 48 hours. Non-putrescible waste shall be removed within 30 days or when the storage containers become full, whichever occurs first. The prohibited waste shall be removed to the appropriate authorized facilities.

[Rule 62-701.803(5), F.A.C.]