TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Great South Timber & Lumber, Inc.
1135 SE State Road 100
Lake City, FL 32056

Facility ID No. 0230045

PROJECT

Project No. 0230045-003-AC
Application for Minor Source Air Construction Permit
Kiln Throughput Increase

COUNTY

Columbia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

March 25, 2011

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

Great South Timber & Lumber, Inc., is an existing sawmill, which is categorized under Standard Industrial Classification Code No. 2421. The facility is located in Columbia County at 1135 SE State Road 100 in Lake City, Florida. The UTM coordinates of the existing facility are Zone 17, 348.62 km East, and 3339.53 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The applicant has proposed to increase the maximum allowed throughput of direct-fired kiln, EU001, from 30 mm Board Feet (BF)/yr to 50 mmBF/yr.

Processing Schedule

January 19, 2011 Received the complete application for a minor source air pollution construction permit.

2. APPLICATION REVIEW

Discussion of Emissions

As provided in the application, the following table summarizes potential emissions for the project.

Table A. Potential Emissions Summary Table (Tons/Year)

Pollutant	Project Potential Emissions (TPY)
CO	12.28
NO_X	2.55
PM/PM_{10}	9.38
VOC	95.00
Methanol	4.00
Formaldehyde	2.58

The source is classified as a natural minor source. Visible emissions are limited to a density of Ringelmann Number 1 (20% opacity) except that a density of Ringelmann Number 2 (40% opacity) is permissible for not more than two minutes in any one hour.

State Requirements

The facility is subject to the following regulations:

- **Chapter 62-4, F.A.C. - Permits**
- Rule 62-4.160, F.A.C.- General Permit Conditions
- Rule 62-4.130, F.A.C. – Plant Operation - Problems
- **Chapter 62-210, F.A.C. – Stationary Sources – General Requirements**
- Rule 62-210. 300, F.A.C. – Permits Required
- Rule 62-210. 350, F.A.C. – Public Notice and Comment
- Rule 62-210.650, F.A.C. – Circumvention
- Rule 62-210.700, F.A.C. – Excess Emissions
- **Chapter 62-296, F.A.C. – Stationary Sources – Emissions Standards**
- Rule 62-296.320, F.A.C.- General Pollutant Emissions Limiting Standards
- Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment
- **Chapter 62-297, F.A.C. – Stationary Sources – Emissions Monitoring**
- Rule 62-297.310, F.A.C. – General Test Requirements

Federal NSPS Provisions

This facility is not subject to federal NSPS provisions.

Federal NESHAP Provisions

This facility is not subject to federal NESHAP provisions.

Other Draft Permit Requirements

The hours of operation are not limited, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 Hours per year. The maximum heat input rate is limited to 22 mmBtu/hour. (Based on sawdust heat value approximately 4500 Btu/lb, maximum 20,000 tons of sawdust burned per year.) The kiln is carbonaceous (wood waste) fired. Visible emissions shall be tested each federal fiscal year (October 1- September 30) using DEP Method 9. Visible emissions with a density of Ringelmann Number 1 (20% opacity) except that a density of Ringelmann Number 2 (40% opacity) is permissible for not more than two minutes in any one hour. The owner or operator shall maintain records for:

(a) The amount of sawdust burned in tons per month for 12-consecutive month. These records shall be retained for five years.
(b) The throughput rate in Mbf per month for 12-consecutive month. These records shall be retained for five years.

3. 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. Brent Steele is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Air Program, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590.