

## STATEMENT OF BASIS

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### Title V Air Operation Permit Renewal Permit No. 0290003-010-AV

#### **APPLICANT**

The applicant for this project is Georgia Pacific Wood Products, LLC. The applicant's responsible official and mailing address are: Mr. James Brody, Vice President Lumber Operations, Georgia Pacific Wood Products, LLC, 133 Peachtree Street NE, Atlanta, Georgia 30303.

#### **FACILITY DESCRIPTION**

This existing facility consists of a saw mill, a planer mill and three direct-fired kilns. The heat source for each direct-fired kiln is a pile burner. The fuel for the burner is green sawdust produced from the sawing operations. The sawdust is collected and conveyed to a fuel silo with cyclone. The silo continuously fed a fuel hopper that provides fuel for the burners.

Air is introduced over and under the burner grate at a flow rate below that required for complete combustion. The smoldering fuel on the burner grate creates hot gases that rose to the top of the burner chamber. Near to the point of exit from the chamber, excess oxygen is mixed with the hot gas to complete the combustion process. The hot air generated is conveyed to the kiln for lumber drying.

Gases from the kiln are exhausted through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after a kiln has undergone multiple heating and cooling cycles.

#### Kiln No.1& No.2 (E.U. 007 & 008)

Kiln Nos. 1 & 2 are manufactured by Irvington Moore/Energy Sys (Currently USNR Woodland). Each kiln has the capacity to load up to 123,000 board feet (Mbf)/charge. The maximum yearly throughput rate for all three kilns combined is limited to 150,000 Mbf/year. The maximum heat input rate for each burner is estimated to be 26 MMBtu/hr. The emissions from the kiln are uncontrolled.

#### Kiln No.3 (E.U. 010)

Kiln No.3 is manufactured by Irvington Moore/Energy Sys (Currently USNR Woodland). The kiln has the capacity to load up to 155,000 board feet (Mbf)/charge. The maximum yearly throughput rate for all three kilns combined is limited to 150,000 Mbf/year. The maximum heat input rate for the burner is estimated to be 29.5 MMBtu/hr. The emissions from the kiln are uncontrolled.

Clarke Detroit 140 BHP Diesel Engine (Emissions Unit No. 013):

The engine is an existing Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is used to pump water for fire suppression. The engine is subject to 40 CFR 63 Subpart ZZZZ- National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The engine is a four-stroke cycle, 6-cylinder, lean

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burn, turbocharged, compression ignition, diesel engine with a total displacement of 5.98 liters. It is used for fire suppression. The year of Manufacture is November 1997.

### **Unregulated/Insignificant Emissions Units and/or Activities:**

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

### **PROJECT DESCRIPTION**

The purpose of this permit is to renew the Title V Air Operation Permit No. 0290003-009-AV. The application states the facility was closed in 2008. The applicant has not provided an actual date of plant shutdown. It is noted that in the year 2008 AOR it was reported that EUs 005, 006, and the Planer Mill (EU 012) operated 7 days (62 hours) during June 2008, with the remaining emissions units not in operation during the 2008 year. Pursuant to Rule 62-210.300(2)(a)3.c., F.A.C. , the operation permit may be renewed for a maximum period not to exceed ten years from the date of shutdown, provided the conditions of Rule 62-210.300(2)(a)3.b, F.A.C. are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship. The applicant provided this information in the application submittal received April 21, 2014. Based on the 2008 AOR information and that the applicant has not provided an actual date of shutdown, the Department proposes a date of June 30, 2008 in order to re-issue the Title V Operation Permit.

Pursuant to Rule 62-210.300(2)(a)4., F.A.C., the permit contains a condition that requires written notification be submitted to the Compliance Authority 60 days prior to reactivation of any of the emissions units at this facility. The written notification must include a demonstration that such reactivation will not constitute any modification or reconstruction pursuant to Chapter 62-210, F.A.C. or any federal regulation adopted by reference at Rule 62-204.800, F.A.C.

Pursuant to Rule 62-210.300(2)(a)4., F.A.C., the permit also contains a condition that requires performance testing for each identified Emissions Unit no later than 180 days from the reactivation date of the emissions unit.

### **PROCESSING SCHEDULE AND RELATED DOCUMENTS**

Application for a Title V Air Operation Permit Renewal received April 21, 2014  
Notice of Intent to Issue Air Permit issued May 15, 2014  
Public Notice Published June 5, 2014

### **PRIMARY REGULATORY REQUIREMENTS**

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

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PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C., as the facility has the potential to emit more than 250 tons of VOC per year.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

The direct-fired kilns are affected source of 40 CFR 63, Subpart DDDD, but are not subjected to any requirements of the subpart except for the initial notification requirements in 40 CFR 63.9(b) according to 40 CFR 63.2252.

The fire pump engine is an affected source of 40 CFR 63, Subpart ZZZZ -National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emissions units at the facility.

GHG: Based on the Greenhouse Gases Emissions calculations, the facility total CO<sub>2</sub>e emissions (including biogenic CO<sub>2</sub>) were 74,804 thousand tons. The facility has the potential to emit less than 100,000 TPY of CO<sub>2</sub>e emissions, and is therefore a minor source of Greenhouse Gases based on EPA's 2010 Gas Tailoring Rule.

### PROJECT REVIEW

Changes that were made as part of this renewal: A subsection is added to the permit to address the fire pump engine regulated by 40 CFR 63 Subpart ZZZZ, the Appendices have been updated to reflect the current Title V permit format (Appendix TV-6 is replaced with Appendix TV- Title V General Conditions, Appendices RR- Facility-wide Reporting Requirements, TR- Facility-wide Testing Requirements have been added), the Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide Conditions are added and reflect the changes to the statutes that went into effect for year 2013, and the Prevention of Accidental Releases Facility-wide condition is revised to reflect the correct reporting agency.

### TITLE V PERMIT FORMAT CHANGES:

- Appendix TV-6 is replaced with Appendix TV- Title V General Conditions
- Appendix RR- Facility-wide Reporting Requirements is added
- Appendix TR- Facility-wide Testing Requirements is added
- Appendix NESHAP, Part 63 Subpart ZZZZ is added
- Appendix NESHAP, Part 63 Subpart A- General Provisions is added

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- The Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide conditions are added as follows:

**FW9. Electronic Annual Operating Report and Title V Annual Emissions Fees.** The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1<sup>st</sup> of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

*{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}*

- The Prevention of Accidental Releases (Section 112(r) of CAA) Facility-Wide Condition is replaced as follows:

**FW4. Prevention of Accidental Releases (Section 112(r) of CAA).** If, and when, the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at

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the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <http://www.epa.gov/osweroe1/content/rmp/index.htm>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

- b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

### COMMENTS FROM APPLICANT

On June 30, 2014, comments from the facility were received concerning the draft/proposed permit. The comments were received within the 30 day comment period from the date of publication of the Public Notice in the Dixie County Advocate on June 5, 2014. The comments are restated with a response below:

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

*Response:* Based on the comment, the 1<sup>st</sup> sentence in the 2<sup>nd</sup> 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., 2<sup>nd</sup> 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., 1<sup>st</sup> 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.

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- 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.

### CONCLUSION

This project renews Title V air operation 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.

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## Florida Department of Environmental Protection

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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.

*"More Protection, Less Process"*  
[www.dep.state.fl.us](http://www.dep.state.fl.us)

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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.