West Fraser, Inc.
McDavid Softwood Converting Facility

Facility ID No. 0330260
Escambia County

Title V Air Operation Permit Renewal

Permit No. 0330260-009-AV
(Renewal of Title V Air Operation Permit No. 0330260-007-AV)

Permitting and Compliance Authority:
State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

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Title V Air Operation Permit Renewal

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Permit No. 0330260-009-AV
McDavid Softwood Converting Facility
Facility ID No. 0330260
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing West Fraser, Inc. McDavid Softwood Converting Facility is located in Escambia County at 401 Champion Drive, McDavid Florida. UTM Coordinates are: Zone 16, 468.74 km East and 3406.5 km North. Latitude is: 30° 47' 34" North; and, Longitude is: 87° 19' 48" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: March 20, 2012
Renewal Application Due Date: August 7, 2016
Expiration Date: March 20, 2017

/s/

Rick Bradburn
Air Program Administrator

RB/dm-aj/c

Subsection A. Facility Description.

This facility processes southern yellow pine logs and has the capability to produce up to 250 million board feet per year of lumber. The principal processes include:

Log storage and processing (debarking and sawing)
Sawmill operations (chipping and sawing)
Drying of green lumber using indirect steam-heated kilns
Product lumber finishing, sorting, and shipping

Ancillary equipment includes wood by-product (bark, chips, sawdust, and shavings) screening, handling, and storage and two 68.7 million Btu per hour heat input natural gas-fired package boilers that provide steam for the lumber drying kilns.

The facility was idled on January 9, 2009 due to market conditions (notification letter sent to DEP). Facility operations, including the boilers and kilns, have been non-operational. In order to ensure that the idled units do not deteriorate during the temporary production curtailment, the facility is performing inspections and storing equipment in their non-operational state to ensure that they are maintained and operate in accordance with the permit upon startup. The fire pump is operated weekly and is inspected daily to ensure that there are no leaks and that the equipment has been maintained. The boilers are closed and stored with desiccant to prevent moisture accumulation and subsequent deterioration of parts. Other equipment at the site is turned over biweekly to ensure proper start-up upon resuming operations. The facility is unable to provide a timeline or expected schedule of start up at the time of the issuance of this permit.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Natural Gas Fired Boiler No. 1
002	Natural Gas Fired Boiler No. 2
003	Lumber Drying Kilns 1,2, and 3
004	Planer Mill Operations
006	Diesel Fired Emergency Fire Pump (existing)
Unregulated Emissions Units and Activities	
005	Fugitive PM Emissions (only subject to facility-wide specific conditions)

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 15, 2011, this facility is a major source of hazardous air pollutants (HAP). The facility is subject to Maximum Achievable Control Technology (MACT) requirements in 40 CFR Part 63 Subpart DDDD - Plywood and Composite Wood Products, for Lumber Drying Kiln Nos. 1, 2, and 3 (EU 003) and 40 CFR Part 63 Subpart DDDDD – National Emissions Standards for Industrial, Commercial, and institutional Boilers and Process Heaters, for natural gas fired boiler Nos. 1 and 2 (EUs 001 and 002). *{Permitting Note: The effective date of 40 CFR 63 Subpart DDDDD was delayed due to petitions for reconsideration. The boilers are expected to remain subject to the Boiler MACT (NESHAP Subpart DDDDD) as existing units subject to work practice standards (annual tune-up) in lieu of emission limits.}* The boilers are subject to regulation under the New Source Performance Standards: 40 CFR Part 60 Subpart A - General Provisions, and Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. However, this regulation only requires record keeping and reporting for natural gas fired boilers. The boilers are also subject to regulation under Rule 62-296.406, F.A.C., for fossil fuel steam generators less than 250 MMBtu/hr, which

requires a determination of BACT for sulfur dioxide and particulate matter emissions. The visible emissions provisions of this rule are less stringent that the limit determined as BACT for the boilers. The CAM requirements of 40CFR Part 64, do not apply. Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. However, since the engines being operated meet the Subpart ZZZZ definition of "existing Units", there are no unit specific applicable requirements that must be met pursuant to this rule at this time. The compliance date for the emergency fire pump is May 3, 2013. The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	**EU No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	001, 002
40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	001, 002
40 CFR 63, Subpart A, NESHAP General Provisions	003, 006
40 CFR 63, Subpart DDDD, NESHAP Plywood and Composite Wood Products	003
40 CFR Part 63 Subpart DDDDD - Industrial, Commercial, and institutional Boilers and Process Heaters * *see permitting note above*	001, 002
40 CFR Part 63 Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines	006
62-296.406, BACT, 62-297.620(4), 62-212.400, F.A.C.	001, 002, 003, 004, 005

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.] *{Permitting Note: Nothing is deemed necessary and ordered at this time.}*

FW4. 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. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. 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 to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads and parking areas.
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.
i. Other techniques as necessary.

Additional reasonable precautions applicable to this facility include:

1. Wood by-product transfer points shall be enclosed to the extent necessary to minimize the emissions of unconfined particulate matter.
2. All by-product (bark, fines (sawdust), chips, shavings) open storage piles shall be shaped and oriented to minimize wind erosion.
3. The manufacturing area and access roadways for the facility shall be paved with asphalt or concrete.
4. The manufacturing area and access roadways for the facility shall be swept or watered as needed to prevent the emissions of unconfined particulate matter.

5. Logs in storage shall be sprinkled with water periodically as needed to minimize the potential for fugitive dust emissions.

[Rule 62-296.320(4)(c) and 62-212.400, F.A.C., BACT, and proposed by applicant in Title V air operation permit application received July 15, 2011] *{Note: The log storage area and the area for log transfer by overhead crane to the sawing and debarking operations are not required to be paved.}*

FW6. Excess Emissions: For purposes of this permit, all limits established pursuant to the State Implementation Plan, including those limits established as BACT, include emissions during periods of startup and shutdown, and are not subject to the provisions of Rule 62-210.700(1), F.A.C. This provision cannot be used to vary any NSPS requirements from any subpart of 40 CFR 60. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown or malfunction shall be prohibited pursuant to Rule 62-210.700(4), F.A.C. [Rules 62-4.070(3) and 62-210.700(5), F.A.C.]

FW7. The Permittee shall properly operate and maintain the lumber drying kilns, as well as the planing and sawing operation and boilers. (Note: letter dated 8/27/01 from Mid-South Engineering certified proper installation of the equipment.) The company compiled operation and maintenance plans for the drying kilns, planing and sawing operations, and boilers that focus on the procedures relevant to minimizing HAP emissions. These operation and maintenance plans must be kept on site and made available to Department personnel for review when requested. [Rule 62-204.800(11)(b)61., F.A.C.; FL-MACT-012, and Permit No. 0330260-002-AC]

FW8. Startup after long term temporary shutdown. The permittee shall notify the Department at least 60 days before restarting operations after the long term temporary shutdown (see notification letter to DEP 01/09/2009). Emissions testing must be conducted within 90 days after initial startup. [Rule 62-4.070(3)]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW9. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW10. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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. [Rule 62-213.205, F.A.C.]

FW11. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW12. 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 to: 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]

Subsection A. Emissions Unit 001 and 002

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Natural Gas Fired Boiler No. 1
002	Natural Gas Fired Boiler No. 2

Each package steam boiler is rated at a maximum heat input of 68.7 million BTU per hour. They are Model 500 Series packaged boilers manufactured by Hurst Boiler & Welding Company. The start-up date was December 4, 2000. The burner is a low NOx design. Emissions units 001 and 002 are subject to 40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.48c); 40 CFR Part 60 Subpart A; Rule 62-296.406, F.A.C. for fossil fuel steam generators less than 250 MMBtu/hr, which requires a determination of BACT for sulfur dioxide and particulate matter emissions; PSD for particulate matter (the visible emissions limit determined as BACT per Rule 62-212.400, F.A.C., is more stringent than the VE limit of Rule 62-296.406, F.A.C.); 40 CFR Part 63 Subpart DDDDD – National Emissions Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters and are subject to the requirements of the state rules as indicated in this permit. The conditions of this permit effectively limit combined annual emissions from these emissions units (combined) to PM 1.4; PM_{10} 1.4; NOx 39.0; CO 70.2; VOC 6.5; and SO_2 0.3 tons per year.

{Permitting Note: The effective date of 40 CFR 63 Subpart DDDDD was delayed due to petitions for reconsideration. The boilers are expected to remain subject to the Boiler MACT (NESHAP Subpart DDDDD) as existing units subject to work practice standards (annual tune-up) in lieu of emission limits.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

EU No.	MMBtu Heat Input in any consecutive 12 month period *	Fuel Type
001 and 002 combined	779, 640	Natural Gas

***** *based on the lower heating value (LHV) of natural gas*

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and applicant request to avoid PSD for NOx and CO in Permit No. 0330260-001-AC/PSD-FL-271]

A.2. Methods of Operation. These emissions units shall burn only pipeline natural gas. [Rule 62-296.406, F.A.C. and permit 0330260-001-AC/PSD-FL-271]

A.3. Hours of Operation. These emissions units may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0330260-001-AC/PSD-FL-271]

A.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. NO_x Emissions. Emissions of nitrogen oxides from each emissions unit (each boiler) shall not exceed 0.10 pounds per million Btu of heat input (LHV). [Rule 62-4.070(3) and applicant request to avoid PSD in Permit No. 0330260-001-AC/PSD-FL-271]

A.6. CO Emissions. Emissions of carbon monoxide from each emissions (each boiler) unit shall not exceed 0.18 pounds per million Btu of heat input (LHV). [Rule 62-4.070(3) and applicant request to avoid PSD in Permit No. 0330260-001-AC/PSD-FL-271]

A.7. Visible Emissions. Visible emissions from each emissions unit shall not exceed 5% opacity. [Rule 62-212.400, F.A.C., BACT, and Permit No. 0330260-001-AC/PSD-FL-271]

Monitoring of Operations

A.8. Daily Observations. The owner or operator shall conduct daily observations of the emissions exhaust points to verify proper operation of the boilers. (The person who performs this observation need not be certified as a visual emissions reader.) This requirement for daily observation of the emissions will be included in the facility Operations and Maintenance Plan. The results of each daily observation shall be recorded in a logbook and made available upon request by the Department. The information recorded, at a minimum, will include: time, date, existence of observable emissions, corrective actions taken (if any) and signature of the individual performing the check. [Rule 62-204.800(15), F.A.C., and 40 CFR 70.6]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
7 or 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-4.070(3), 62-212.400, and 62-297.401, F.A.C., BACT, and applicant request to avoid PSD in Permit No. 0330260-001-AC/PSD-FL-271]

A.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.11. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each boiler (EU001 and EU002) shall be tested to demonstrate compliance with the emissions standards for visible emissions. [Rules 62-4.070(3), 62-212.400, and 62-297.310(7), F.A.C., BACT and applicant request to avoid PSD in Permit No. 0330260-001-AC/PSD-FL-271]

A.12. Compliance Tests Prior To Renewal. Compliance tests shall be performed on each boiler (EU001 and EU002) once every 5 years for NO_x and CO. The tests shall occur within the 12 month period prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits for NO_x and CO. Results shall be expressed in terms of pounds per million Btu of heat input based on the lower heating value (LHV) of the natural gas fired. [Rules 62-4.070(3), 62-210.300(2)(a), 62-212.400, and 62-297.310(7)(a), F.A.C., and applicant request to avoid PSD in Permit No. 0330260-001-AC/PSD-FL-271]

Recordkeeping and Reporting Requirements

A.13. Records of Heat Input Required: The owner or operator shall make and maintain the following records to demonstrate compliance with the heat input limitation on the permitted capacity of this section. Monthly records shall be completed no later than five days after the end of each month.

a. An analysis of the lower heating value (LHV) of the natural gas burned, obtained from the gas supplier at least once each calendar quarter.

b. The amount of natural gas burned in both boilers each month.

c. Monthly heat input for both boilers in units of MMBtu per month, calculated as the product of the amount of natural gas burned during each month times the LHV of the natural gas.

d. Rolling 12-month total heat input for both boilers in units of MMBtu per consecutive 12-month period, calculated as the sum of heat input for the current month and the preceding eleven months.

[Rule 62-4.070(3), F.A.C. and Permit No. 0330260-001-AC/PSD-FL-271]

A.14. Records of Daily Observations. The owner or operator shall record the results of the daily emissions observation required by Monitoring Operations, Daily Observations.

A.15. Pursuant to 40 CFR 60.48c Reporting and Recordkeeping Requirements: The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day or as an alternative to meeting the requirements of paragraph (g)(1) of 40 CFR 60.48c, the owner or operator may elect to record and maintain records of the amount of each fuel combusted during each calendar month. All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. [40CFR 60.48c(g)(1) or (g)(2) and Permit No. 0330260-001-AC/PSD-FL-271] *{Permitting Note: Five year record keeping is required for facilities subject to a NESHAP [40 CFR 63.10(b)].}*

A.16. Recordkeeping for 40 CFR 63 subpart DDDDD. The owner of operator must keep copies of records, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report. The owner or operator shall maintain files of all information (including all reports and notifications) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40CFR 63.7555 and 40 CFR 63.10(b)(1) and (b)(2)(xiv)]

{Permitting Note: The effective date of 40 CFR 63 Subpart DDDDD was delayed due to petitions for reconsideration. The boilers are expected to remain subject to the Boiler MACT (NESHAP Subpart DDDDD) as existing units subject to work practice standards (annual tune-up) in lieu of emission limits.} {Permitting Note: Initial Notification was timely submitted on February 4, 2005.}

A.17. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

A.18. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the applicable requirements contained in 40 CFR 60, Subpart A and 40 CFR 63, Subpart A – General Provisions and 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and 40 CFR 63, Subpart DDDDD – National Emissions Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters (see permitting note above). [Rule 62-213.440, F.A.C.]

Subsection B. Emissions Unit 003

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	Lumber Drying Kilns 1, 2 and 3

Each kiln is vented with 10 roof vents (with 5 vents in use at one time). Indirect heat is provided by steam from the two package boilers. The green sized lumber is dried in the kilns to reduce lumber moisture content from approximately 50 to 20 percent under carefully controlled temperature and relative humidity conditions. The lumber drying is achieved by circulating heated air over the stacked green lumber using bidirectional fans located near the ceiling of the kilns. The circulated air used for drying will be heated indirectly by means of heat transfer from steam coils located within the kilns. Typical drying cycle takes approximately 18 hours. There are no controls on the kilns. Emissions unit 003 is subject to regulation under Rule 62-212.400, F.A.C. for Prevention of Significant Deterioration (PSD); Rule 62-204.800(11)61., F.A.C. for 40 CFR Part 63 Subpart DDDD - Plywood and Composite Wood Products (initial notification); and is subject to the requirements of the state rules as indicated in this permit. The applicant has estimated the potential to emit of this emissions unit to be 355 tons per year of VOC (as carbon basis) and 4.6 tons per year of $PM/PM_{10}/PM_{2.5}$. *{Note: The PTE for the kilns is higher than the previous renewal permit because the renewal did not include the increase in production to 250 million board feet per year.}*

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

B.2. Lumber Production Limitation: Lumber processed through this emissions unit (all kilns combined) shall not exceed 250 million board feet in any consecutive 12-month period. Permittee shall submit a PSD preconstruction review application with any future construction projects relating to changes in this production rate. [Rules 62-210.200 (PTE) and 62-212.400(12)(b), F.A.C. - PSD Source Obligation and Permit No. 0330260-005-AC]

B.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.4. Visible Emissions. Visible emissions from each kiln of this emissions unit shall not exceed 5% opacity. [Rule 62-212.400, F.A.C., BACT, and Permit No. 0330260-001-AC/PSD-FL-271]

Monitoring of Operations

B.5. The requirement for periodic monitoring is satisfied by the recordkeeping requirements described in the Recordkeeping and Reporting Requirements section. [Rule 62-204.800(15), F.A.C. and 40 CFR 70.6]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.6. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-4.070(3), 62-212.400, and 62-297.401, F.A.C., BACT, and Permit No. 0330260-001-AC/PSD-FL-271]

B.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.8. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), at least one set of vents of each kiln of EU 003 shall be tested to demonstrate compliance with the emissions standards for VE. [Rules 62-4.070(3), 62-212.400 and 62-297.310(7), F.A.C., BACT and Permit No. 0330260-001-AC/PSD-Fl-271]

Recordkeeping and Reporting Requirements

B.9. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

B.10. Records of Production Required: The owner or operator shall make and maintain the following records to demonstrate compliance with the lumber production limitation of this section: (Monthly records shall be completed no later than five days after the end of each month.)

- The amount of lumber processed through this emissions unit (all kilns combined) each month, in units of million board feet per month.
- Rolling 12-month total lumber processed, in units of million board feet per consecutive 12-month period, calculated as the sum of lumber processed for the current month and the preceding eleven months.

[Rule 62-4.070(3), F.A.C. and Permit No. 0330260-001-AC/PSD-FL-271]

B.11. 40 CFR 63 Subpart DDDD. The owner of operator must keep copies of records, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report. [40CFR 63.2282 and 63.10(b)(2)(xiv)]

{Permitting Note: Initial Notification, as required in 40CFR 63.2280, was timely submitted on December 16, 2004}

B.12. The owner or operator shall maintain files of all information (including all reports and notifications) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40CFR 63.2283 and 63.10(b)(1)]

Other Requirements

B.13. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart DDDD – Standards of Performance for Plywood and Composite Wood Products.) [Rule 62-213.440, F.A.C.]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
004	Planer Mill Operations

Individual boards are planed and trimmed in the planer mill. The planer mill planning and trimming operations are equipped with local exhaust ventilation to collect PM/PM10/$PM_{2.5}$ shavings. Collected shavings are conveyed pneumatically to a cyclone/baghouse control system located adjacent to the wood by-product storage bins. Shavings removed by the cyclone collector are stored in the shavings bin and then loaded into trucks for shipment offsite. Shavings removed by the baghouse are routed to screw conveyors and loaded into trucks for shipment offsite. The planer mill will also include a small hog/shaver for reducing the size of trimmed wood material. Fines generated by the hog/shaver Emissions unit 004 is subject to regulation under Rule 62-212.400, F.A.C. for Prevention of Significant Deterioration (PSD); and is subject to the requirements of the state rules as indicated in this permit. The applicant proposed emissions not to exceed 0.004 grains per dry standard cubic foot (dscf) at a nominal flow rate of 60,000 dscfm, which is equivalent to the limit of 2.1 pounds per hour. The conditions of this permit effectively limit combined annual emissions from this emissions unit to 9.0 tons per year of PM/PM_{10}.

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

C.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.3. Particulate Matter Emissions. Emissions of particulate matter (PM) shall not exceed 2.1 pounds per hour. This emissions unit shall be equipped with a particulate capture and control system consisting of a local exhaust ventilation system ducted to a cyclone followed by a baghouse. [Rules 62-4.070(3) and 62-212.400, F.A.C., BACT, and Permit No. 0330260-001-AC/PSD-FL-271]

C.4. Visible Emissions. Visible emissions from each emissions unit shall not exceed 5% opacity. [Rules 62-212.400 and 62-297.620(4), F.A.C., BACT, and Permit No. 0330260-001-AC/PSD-FL-271]

C.5. Compliance with VE Limit in Lieu of Stack Test: After initial testing that demonstrates compliance with the Particulate Matter Emissions limit of this section is completed, subsequent compliance testing for PM emissions from this emissions unit is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emissions standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40CFR Part 60 Appendix A. [Rule 62-297.620(4), F.A.C., and applicant request in Permit No. 0330260-001-AC/PSD-FL-271]

Monitoring of Operations

C.6. Daily Observations. The owner or operator shall conduct daily observations of the baghouse exhaust point to verify proper operation of the pollution control system. (The person who performs this observation need not be certified as a visual emissions reader.) This requirement for daily observation of the emissions will be included in the facility Operations and Maintenance Plan. The results of each daily observation shall be recorded in a logbook and made available upon request by the Department. The information recorded, at a minimum, will include: time, date, magnehelic pressure drop, existence of observable emissions, corrective

actions taken (if any) and signature of the individual performing the check. [Rule 62-204.800(15), F.A.C., and 40 CFR 70.6]

Test Methods and Procedures

{**Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.7. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
5B	(if required) Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-4.070(3), 62-212.400, and 62-297.401, F.A.C., BACT, in Permit No. 0330260-001-AC/PSD-FL-271]

C.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

C.9. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), this emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions. [Rules 62-4.070(3), 62-212.400, and 62-297.310(7), F.A.C., BACT, in Permit No. 0330260-001-AC/PSD-FL-271]

Recordkeeping and Reporting Requirements

C.10. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

C.11. Records of Daily Baghouse Observations. The owner or operator shall record the results of the daily baghouse observations required by Daily Observations of this section. These records shall be maintained for a period of five years and made available to the Department when requested.

Subsection D. Emissions Unit 006

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
006	Diesel fired emergency fire pump (existing)

The John Deere Model JDFP-06WA diesel fired emergency fire pump has a rating of 265 hp at 1760 rpm and was installed in 2000. Other than maintenance and readiness testing (10 minutes per week), it is operated only in emergency situations whenever the dry fire system is activated (sprinkler, fire extinguishers, etc.) are activated. The fire pump's diesel engine is subject to requirements of 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), but is not subject to 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines since the fire pump was installed prior to 2000 and manufactured in 1999. The existing unit was exempt from construction permitting requirements according to Rule 62-210.300(3)(a)35., F.A.C., The final compliance date for the applicable Subpart ZZZZ requirements for this engine is May 3, 2013.

Essential Potential to Emit (PTE) Parameters

D.1. Hours of Operation.

a. *Emergency Situations*. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(1)(i)]

b. *Maintenance and Testing*. Each RICE is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. [40 CFR 63.6640(f)(1)(ii)]

c. *Non-emergency Situations*. Each RICE is authorized to operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. [40 CFR 63.6640(f)(1)(iii)]

d. *Other Situations*. Each RICE cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power. [40 CFR 63.6640(f)(1)(iii)]

e. *Engine Startup*. During periods of startup the owner or operator must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for the appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. The emergency fire pump is not subject to any emission limitations, only work practice standards. [40 CFR 63.6625(h) and 40 CFR 63, Subpart ZZZZ, Table 2c(1)]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.2. Work or Management Practice Standards.

a. *Oil*. Change oil and filter every 500 hours of operation or annually, whichever comes first. [40 CFR 63 Subpart ZZZZ Table 2c(1)(a)]

b. *Air Cleaner*. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. [40 CFR 63 Subpart ZZZZ Table 2c(1)(b)]

c. *Hoses and Belts*. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63 Subpart ZZZZ Table 2c(1)(c)]

d. *Operation and Maintenance*. Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions or develop and follow your own maintenance plan which must provide, to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution, control practice for minimizing emissions. [40 CFR 63.6625(e) and 40 CFR 63 Subpart ZZZZ Table 6 (9)]

e. *Oil Analysis*. The owner or operator has the option of using oil analysis to extend the change requirement. The oil analysis must be performed at the same frequency specified for changing the oil in 40 CFR 63 Subpart ZZZZ Table 2c(1)(a). The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent of water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent of water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(i)]

Monitoring of Operations

D.3. Hour Meter. The owner or operator must install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]

Compliance

D.4. Continuous Compliance. Each unit shall be in compliance with the emission limitations and operating standards in this section at all times. [40 CFR 63.6605(a)]

D.5. Operation and Maintenance of Equipment. At all times the owner or operator must operate and maintain, any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the compliance authority which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

Recordkeeping Requirements

D.6. Notification, Performance and Compliance Records.

a. A copy of each notification and report that the owner or operator submitted to comply with this section, including all documentation supporting any Initial Notification or Notification of Compliance Status that the owner or operator submitted.

b. The owner or operator must keep the records required in 40 CFR 63 Subpart ZZZZ Table 6 of this section to show continuous compliance with each emission limitation or operating requirement.

c. The owner or operator must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655]

D.7. Malfunction Records.

a. Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.

b. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655]

D.8. Maintenance Records.

a. Records of all required maintenance performed on the air pollution control and monitoring equipment.

b. The owner or operator must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE and after-treatment control device (if any) are operated and maintained according to its own maintenance plan. [40 CFR 63.6655]

Reporting Requirements

D.9. Emergency Situation. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c(1) of 40 CFR 63 Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63 Subpart ZZZZ Table 2c, footnote 1]

D.10. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

D.11. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit(s) is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions (except for 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9 (b) – (e), (g) and (h)); and 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. [Rules 62-213.440 and 63.6645(a)(5), F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix ICE, Requirements for Internal Combustion Engines.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions. (Include for all units that are subject to a NESHAP)
Appendix NESHAP, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart Dc – Standards of Performance for Small Industrial/Commercial/Institutional Steam Generating Units.