Title V Air Operation Permit Renewal
Permit No. 0390009-008-AV

APPLICANT

The applicant for this project is Coastal Forest Resources Company. The applicant's responsible official and mailing address are: Jim Pattillo, General Manager, Coastal Forest Resources Company, 8007 Florida-Georgia Highway, Post Office Box 1128, Havana, Florida 32333-1128.

FACILITY DESCRIPTION

The applicant operates the Havana Plywood Plant, which is located in Gadsden County at 8007 Florida-Georgia Highway in Havana, Florida.

Coastal Forest Resources Company is a softwood plywood manufacturing facility. The facility consists of three boilers, log debarking and peeling, three plywood veneer dryers, three plywood presses, a plywood pneumatic conveying system and a green chip conveyor. Plywood production is limited to 280,000 thousand square feet per year (MSF/year) 3/8" basis to avoid Prevention of Significant Deterioration (PSD) requirements. The plywood is made by debarking and cutting pine logs into eight-foot sections of wood (blocks). The blocks are heated (to make them easier to cut) prior to being transferred to a wood lathe where the blocks are peeled into green (undried) veneers. The green veneers are dried by passing them through the veneer dryers. Glue is then sprayed between layers of the softwood veneer forming an un-pressed and un-trimmed 4x8 sheet of plywood. The unfinished sheet is put into a hot press that applies pressure and heat to set the glue. Collected wood waste from the facility is burned in the boilers to produce steam for the veneer dryers and presses. A dryer emissions control system (EU 018) collects VOC and HAP emissions from the veneer dryers' hot zones for destruction in the boilers for compliance with 40 CFR 63 subpart DDDD. Particulate matter (PM) emissions from Boilers #4 and #5 are controlled by multicyclone collectors. PM emissions from Boiler #3 are controlled by a multicyclone collector followed by a wet scrubber which is subject to the requirements of 40 CFR 64 – Compliance Assurance Monitoring (CAM) and Best Available Control Technology (BACT) Determination of February 27, 1980. Emissions from the 3 hot presses are released uncontrolled through four roof exhaust fans. The pressed plywood is trimmed, finished and packaged for shipment.

The facility also includes an unregulated emissions unit that includes several activities. The plywood pneumatic conveying system consists of a low pressure sanderdust system, a high pressure sanderdust system with silo, and a plytrim system. PM emissions are controlled by two baghouse filters for the low pressure system, a baghouse filter for the high pressure system and a cyclone for the plytrim system. Wood chips are conveyed (Green Chip Conveyor – no controls) to a truck loading bin for delivery off site. The plywood pneumatic conveying system and the green chip conveyor are not subject to any specific emission limiting standard except for the general visible emissions standard of 20% opacity.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit and incorporate subpart DDDDD of 40 CFR 63 (Boiler MACT) for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **June 22, 2009**
Application for a Title V Air Operation Permit Renewal [EPSAP 3623-1] received **November 12, 2013**
Additional Information Request dated **November 26, 2013**
Additional Information Response [EPSAP 3623-2] received **December 2, 2013**
Notice of Intent to Issue Air Permit issued **February 13, 2014**
Public Notice Published **March 6, 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.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

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) applies to EU005, Boiler #3 for the regulated emissions of particulate matter, which are controlled by a multicyclone collector followed by a wet scrubber.

PROJECT REVIEW

There have been no significant changes to the facility`s equipment or mode of operation since the previous Title V Permit Renewal. However, upcoming equipment, operating, and reporting modifications to comply with 40 CFR 63 subpart DDDDD, Emissions Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters (Major Boiler MACT) will need to be incorporated by the compliance date of January 31, 2016.

During this permit renewal, it was found that PM testing for Boiler #3 is only required prior to obtaining a renewed operating permit according to Rule 62-297.310(7)(a)3. The annual testing during each federal fiscal year of Rule 62-297.310(a)4.b. only applies to emissions units that have the potential to emit 100 tons per year or more of a listed regulated pollutant and PM is one of those. The potential PM emissions for Boiler #3 are less than 100 tons per year so annual testing is not required.

Other changes that were made as part of this renewal include the addition of specific conditions for the existing stationary emergency generator (EU019) and fire pump reciprocating internal combustion engines (EU020). Also some reformatting, replacement of TV-6 with new Appendix TV, and streamlining of EU sections by moving common conditions to the new appendices occurred for this permit renewal.

CONCLUSION

This project renews Title V air operation permit No. 0390009-007-AV, which was issued on June 22, 2009. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.