Rex Lumber, LLC
Graceville Lumber Mill

Facility ID No. 0630011
Jackson County

Title V Air Operation Permit Renewal

Permit No. 0630011-014-AV

Renewal of Title V Air Operation Permit No. 0630011-012-AV

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Northwest District

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

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Florida Department of Environmental Protection

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

Rick Scott
Governor

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Secretary

December 4, 2013

PERMITTEE:
Rex Lumber, LLC
5299 Alabama Street
Graceville, Florida 32440

Permit No. 0630011-014-AV
Graceville Lumber Mill
Facility ID No. 0630011
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 Graceville Lumber Mill is located in Jackson County at 5299 Alabama Street in Graceville, Florida. UTM Coordinates: Zone 16, 641.43 km East and 3425.4 km North; and, Latitude: 30° 57’ 12.78” North and Longitude: 85° 31’ 10.58” 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: December 3, 2013
Renewal Application Due Date: April 22, 2018
Expiration Date: December 3, 2018

_____/s/_____
J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/ha/m

Section I. Facility Information.

This is a renewal of Title V air operation permit 0630011-012-AV, which was issued on June 11, 2009 and revised on March 2, 2010 (permit revision No. 0630011-013-AV) to incorporate changes made under permit No. 0630011-011-AC.

The lumber drying kilns (Kiln Nos. 1, 2, 3 & 4) are subject to (NESHAP) 40 CFR 63, subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, by specific designation in Section 63.2231(a). However, based on 40 CFR 63.2252, which list the requirements for process units that have no control or work practice requirements specified in section 63.2240 (including, but not limited to, lumber kilns), the Kilns are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, or recordkeeping/reporting requirements of this subpart, or any other requirements in subpart A of this part. The Kilns are subject to the initial notification requirements in section 40 CFR 63.9(b) and the recordkeeping requirements of section 40 CFR 63.10(b)(1).

Subsection A. Facility Description.

The facility produces dimensional lumber from yellow pine logs. The facility consists of a log debarker, sawmill, wood waste handling and storage system, four direct-fired lumber drying kilns and a planer mill. Raw logs are debarked, cut to length, rough-sawn and then sent to the drying kilns. The dried lumber is finished to dimensional lumber sizes in the planer mill and is then trimmed, graded and bundled for shipment. Waste products such as bark, green chips and sawdust, and dried chips and sawdust are either shipped off site or used as fuel for the direct fired kilns. The facility has a total of four cyclones (Planer Mill Shavings Cyclone; Shavings Bin Cyclone; Fuel Storage Silo Cyclone for Kiln Nos. 1 and 2, and a Fuel Storage Silo Cyclone for Kiln Nos. 3 and 4) to control Particulate Matter (PM) emissions from equipment used for the handling and storage of wood waste. The maximum production rate for the facility is 170,112,000 board feet of lumber per year.

Total potential emissions (tons/year) are as follows:

Pollutant	**CO**	**NOx**	PM	PM10	**PM2.5**	**SO_2**	VOC[1]	**H115**[2]	**Phenol**	**H095**[2]	**H001**	**Total HAP**
Kiln No. 1[3]	57.8	47.2	38.5	34.7	29.9	2.4	95.2	4.8	0.20	0.20	1.04	6.26
Kiln No. 2[3]	57.8	47.2	38.5	34.7	29.9	2.4	95.2	4.8	0.20	0.20	1.04	6.26
Kiln No. 3[3]	65.7	24.1	36.1	31.8	27.4	2.7	106.5	5.4	0.22	0.22	1.17	7.01
Kiln No. 4 [3]	65.7	24.1	36.1	31.8	27.4	2.7	106.5	5.4	0.22	0.22	1.17	7.01
Cyclones (4) Unregulated			35.0	21.4	21.4							
Log Sawing (Fugitive)			8.17	4.49	4.49							
Log Debarking (Fugitive)			8.17	4.49	4.49							
Total	**247.0**	**142.6**	**200.7**	**163.3**	**144.9**	**10.3**	**403.2**	**20.4**	**0.85**	**0.85**	**4.42**	**26.54**

[1]VOC includes both the fuel burning and the wood drying components of the direct fired kilns.
[2]Methanol and formaldehyde are both a VOC and HAP and are included in the VOC total.
[3]Kiln Nos. 1 and 2 burn only "dry" (kiln dried) waste wood and no bark. Kilns Nos. 3 and 4 burn only "wet" wood (never kiln dried) and no bark. The AP 42 emission factors for PM and NOx are lower for "wet" wood (no bark) as compared to "dry" wood (no bark).

Note: The VOC emission factor for the kilns is 4.74 lb VOC/1000 board-feet, based on National Council for Air and Stream Improvement (NCASI) Bulletin 845 and emission factors for Formaldehyde and Methanol from the NCASI 2008 SARA Handbook. US EPA recommends calculating VOC total as follows: VOC total = 3.8 lb VOC (as Carbon) per MBF + Formaldehyde + (0.36 x Methanol). Therefore, VOC total = 3.8 lb VOC (as Carbon)/MBF x 1.222 (convert carbon to Propane) + 0.01 lb Formaldehyde/MBF + 0.36 x 0.24 lb Methanol/MBF.

Debarking and Sawmill Operations

Logging trucks deliver whole logs to the facility where they are stored in the log storage yard until they are ready to be processed. The logs are loaded onto the debarker log infeed deck, the bark is removed and the logs are trimmed to the appropriate length. The bark is conveyed via covered conveyer to a bark storage bin.

The debarked logs are mechanically conveyed through the saw-mill and rough-cut into individual boards. The cut and trimmed boards are sorted, stacked and routed to the green lumber storage area.

The wood waste (chips and sawdust) generated by the saw-mill is conveyed via covered conveyer to a storage bin. Any large pieces of unused wood are run through a chipper before going to storage cyclone. The saw-mill is fully enclosed to prevent any fugitive emissions.

Lumber Drying Kilns

The green lumber is transferred to the drying kilns. The facility has a total of four direct fired lumber drying kilns. Batch Kiln Nos. 1 and 2 are each equipped with a McConnell (Model 36) burner that has a maximum heat input rating of 22 MMBtu/hr. Continuous Kiln Nos. 3 and 4 each have a maximum heat input of 25 MMBtu/hr. The wood waste is metered from the fuel storage silo to the wood burners and the flue gases from each burner are ducted to the associated lumber kiln. Kiln Nos. 1 and 2 are each 32 feet by 68 feet and will hold 110,000 board feet of lumber per load. Each load requires approximately 24 hours for drying. Kiln Nos. 3 and 4 are 33 feet by 204 feet and each has a maximum production rate of 61,600,000 board feet of lumber per year for the facility.

The Kilns (EU-022 and EU-041) were constructed after 1974 and are the only regulated emission units at the site. These emissions units are regulated in accordance with 62-296.410(2)(a), F.A.C. (Carbonaceous Fuel Burning Equipment). Volatile Organic Compound (VOC) emissions from the kilns are uncontrolled. Visible emissions from the kilns are limited to 20% opacity under normal operation.

The facility processes yellow pine which has a higher heating value of 9,000 Btu per oven dry pound at 0% moisture, as identified by the applicant in supporting referenced material in the application.

Planer Mill

Lumber from the dry lumber storage area is transported to the planer mill where the lumber is sized to specifications. The wood waste (shavings, dust and trim blocks) from the planer mill is captured and pneumatically conveyed to the planner mill shavings cyclone, shavings bin cyclone and eventually to the shavings storage bin or the fuel storage silo. The trim blocks from the end trim operation in the planer mill are routed through the planer mill hog (exiting as wood chips) before they are pneumatically conveyed to the wood waste handling system, as mentioned above. The finished lumber is then sorted, stacked, banded and stored until final shipment.

The new shaver and cyclone that were added to the Planer Mill in 2010 to produce dry planer mill wood shavings for stable bedding are no longer needed and the equipment has been removed. These changes to the Planer Mill were considered part of unregulated emissions unit EU039 and did not require a construction permit. Facility-wide PM emissions were not affected by the installation and subsequent removal of the shaver and cyclone.

The new wood treatment step, added to the production line in 2010 to spray the antifungal “AntiBlu XP-64” or equivalent on the finished lumber products to control sapstain and mold, was considered an insignificant activity and did not require a construction permit because it was estimated to emit only 1.36 TPY of VOC. (See letter from the Department to Mr. Randy Cummings, Responsible Official for Rex Lumber, LLC, dated April 20, 2010.)

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
022	Direct-Fired Batch Lumber Drying Kiln Nos. 1 and 2
041	Direct-Fired Continuous Lumber Drying Kiln Nos. 3 and 4
Unregulated Emissions Units and Activities (see Appendix U-1, List of Unregulated Emissions Units and/or Activities)	
039	Planer Mill Shavings Cyclone, Shavings Bin Cyclone, Fuel Storage Silo Cyclone No. 3 (Kiln Nos. 1 & 2), Fuel Storage Silo Cyclone No.4 (Kiln Nos. 3 & 4)

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application (EPSAP No. 3579-1) received October 1, 2013, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. Further increases in any of the priority pollutants that exceed the PSD Major Modification Threshold (list in table above) will require a PSD review. [Rule 62-210.200(194)(a), F.A.C.]. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart DDDD - Plywood and Composite Wood Products	022, 041
State Rule Citations	
62-210.370(3) - Annual Operating Report	Facility-Wide
62-213.205 - Annual Emissions Fee	Facility-Wide
62-213.440 - Permit Content	Facility-Wide
62-296.320(1) - Volatile organic compounds emissions or organic solvents emissions	Facility-Wide
62-296.320(2) - Objectionable Odor Prohibited	Facility-Wide
62-296.320(4)(b) - General Visible Emissions Standard	Facility-Wide
62-296.320(4)(c) - Unconfined Emissions of Particulate Matter	Facility-Wide
62-204.800(11)(b)61 - Standards Adopted: NESHAP 40 CFR 63 Subpart DDDD	022, 041
62-210.700 - Excess emissions	022, 041
62-296.410 - Carbonaceous Fuel Burning Equipment	022, 041
62-297.310 - General Compliance Test Requirements	022, 041
62-297.401(9)(c) - DEP Method 9. The provisions of EPA Method 9 (40 CFR 60 Appendix A)	022, 041

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. [Rules 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. *Nothing is deemed necessary and ordered at this time*. [Rule 62-296.320(1), F.A.C.]

FW4. General Visible Emissions. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, 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. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C. and permit 0630011-008-AC]

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. Wet down of unpaved roads as needed;

b. Daily inspection of cyclones, conveyance equipment and, pressure piping to ensure proper operation.

[Rule 62-296.320(4)(c), F.A.C. and permit 0630011-008-AC]

Annual Reports and Fees

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

FW6. 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.]

FW7. 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.]

FW8. 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 440(3)(b), F.A.C.]

Subsection A. Emissions Unit 022

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

EU No.	Brief Description
022	Direct Fired Batch Lumber Drying Kiln Nos. 1 and 2

Each lumber drying kiln is 32 feet by 68 feet and will hold 110,000 board feet of lumber per load. Each load is processed as a batch and requires approximately 24 hours for drying. Each kiln burner is rated at a maximum of 22 MMBtu/hr and each kiln can process up to maximum of 40,150,000 board feet a year. These two batch kilns were constructed under AC32-78689, issued February 13, 1984.

Emissions from the kilns are uncontrolled. The facility utilizes good operating practices to control emissions from Kiln Nos. 1 and 2. Visible emissions from the kilns are limited to 20% opacity under normal operation. Emissions (primarily VOC) are limited by limiting the production rate (facility-wide) and the heat input to each kiln. No other controls are applied and emissions from the lumber drying kilns are emitted directly to atmosphere from the burner and multiple points of the kiln.

Wood fuel for these Kilns is kiln-dried yellow pine waste wood from the planer at the facility with an average moisture content of 10% by weight. The facility processes yellow pine which has a higher heating value of 9,000 Btu per oven dry pound at 0% moisture, as identified by the applicant in supporting referenced material in the application.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable process rate for this emission unit (Kiln Nos. 1 and 2) is the amount of wood processed that, when added to the wood processed by Emission Unit 0 41 (Kiln Nos. 3 and 4), does not exceed a facility-wide total of 170,112,000 board feet of lumber per consecutive 12-month period. For emissions testing purposes only, the maximum process rate of each kiln shall be 110,000 board feet of lumber per load (batch, 24-hour period). The maximum allowable heat input rate is as follows:

Unit No.	MMBtu/hr Heat Input (24-hour average)	Fuel Type
022 Kiln No. 1	22.0	Carbonaceous fuel
022 Kiln No. 2	22.0	Carbonaceous fuel

[Rules 62-4.070(3), 62-210.200(PTE), F.A.C.; and permits AC32-78689, 0630011-008-AC and 0630011-011-AC]

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

A.3. Methods of Operation (fuel). This emissions unit (Kiln Nos. 1 and 2) shall be fueled by carbonaceous fuel (wood waste) only. Each kiln is limited to a maximum heat input of 22.0 MMBtu/hr based on a 24-hour average and a wood waste heating value of 18.68 MMBtu/ton at 10% moisture by weight (20.76 MMBtu/ton, dry basis). [Rules 62-4.070(3), 62-213.440, F.A.C.; and permits 0630011-008-AC and 0630011-011-AC]
{Permitting Note: Wood fuel for these kilns is kiln-dried yellow pine waste wood from the planer at the facility with an average moisture content of 10% by weight.}

A.4. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C. and permits AC32-78689 and 0630011-008-AC]

Emission Limitations and Standards

Unless otherwise specified, the averaging time is based on the specified averaging time of the applicable test method.

A.5. Visible Emissions. Visible emissions shall not exceed 20% opacity under normal operation except for up to two minutes in any one hour at not more than 40% opacity. [Rule 62-296.410(2)(a), F.A.C., and permits AC32-78689 and 0630011-008-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.6. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.; and permit 0630011-008-AC]

A.7. Excess Emissions Prohibited. 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 startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.; and permit 0630011-008-AC]

Monitoring of Operations

A.8. Operation and Maintenance (O&M) and Startup, Shutdown and Malfunction (SSM) Plan: Permittee shall operate the kilns in accordance with the following O&M and SSM Plan. (See Attachment: Kiln 1 and 2 Operation and Maintenance Plan for details.)

1. Prevention of over drying;
2. Ensure consistent moisture content; and
3. Drying at the minimum temperature.

Permittee may change the O&M and SSM plan by submitting a request in accordance with Rule 62-213.410(2), F.A.C., at least seven days prior to implementing the change.
[Rule 62-212.400(BACT), F.A.C., and 0630011-008-AC]

Test Methods and Procedures

See Appendix TR, Facility-Wide Testing Requirements: Frequency of Compliance Tests and Operating Rate During Testing for additional details.

A.9. Emissions Tests. Visible emissions (VE) tests are required to show compliance with the standards of the Department. [Rules 62-297.310(7)(a)4 and 62-297.310(2) & (2)b, F.A.C.]

A.10. Visible Emissions. The test method for visible emissions shall be DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with exceptions in Chapter 62-297, F.A.C. [Rules 62-296.410(3)(a) and 62-297.401(9)(c), F.A.C.]

A.11. 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.12. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each kiln in this EU shall be tested to demonstrate compliance with the emissions standards for VE. In addition to the annual compliance tests specified above, testing shall be scheduled the year before the facility's Title V permit renewal application is due so the results can be included with the submission of the application. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

A.13. Process Records. The owner or operator shall maintain records of the amount of lumber processed through each kiln in board-feet per month and per year. The records shall be available for inspection by the Department. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and permit 0630011-008-AC]

A.14. Fuel Records. The owner or operator shall maintain records of the fuel input in tons/hr and the heat input in MMBtu/hr and MMBtu/hr on a 24-hour average for each kiln. The records shall be available for inspection by the Department. [Rule 62-213.440(1)(b), F.A.C., and permit 0630011-008-AC]

A.15. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

40 CFR Part 63 Subpart DDDD. (NESHAP: Plywood and Composite Wood Products). These kilns are subject to the initial notification requirements in section 63.9(b) and the recordkeeping requirements of section 63.10(b)(1) of 40 CFR 63 Subpart DDDD.

A.16. 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. [40 CFR 63.2282 and 63.10(b)(2)(xiv) and Rule 62-204.800(11)(b)61, F.A.C.]

A.17. 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 five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.2283 and 63.10(b)(1) and Rule 62-204.800(11)(b)61, F.A.C.]

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

EU No.	Brief Description
041	Direct-Fired Continuous Lumber Drying Kiln Nos. 3 and 4

Lumber Drying Kiln Nos. 3 and 4 are wood waste fueled, external combustion, lumber drying kilns, equipped with a green sawdust gasifier. Each kiln is approximately 33 feet wide by 204 feet long (total length of the pre-heat, high temperature drying kiln, and cool-down segments). Each kiln will hold 168,767 board feet of lumber at a time. Each kiln is heated by a 25 MMBtu/hr wood fired burner fueled by green (wet) yellow pine wood waste/sawdust generated at the facility. The wood waste is metered from the fuel storage silo to the wood burner and the hot flue gases are routed to the lumber kilns. The drying time for each load is approximately 24 hours. Each kiln has a rated maximum production rate of approximately 61,600,000 board feet of lumber per year. Kiln No. 3 was originally constructed as a batch kiln under 0630011-008-AC with a construction effective date of October 1, 2004. Kiln No. 3 was converted to continuous flow and Kiln No. 4 was constructed as a Continuous-Flow Kiln No. 4 under permit 0630011-011-AC.

Emissions from the kilns are uncontrolled. The facility utilizes good operating practices to control emissions from Kiln Nos. 3 and 4. Visible emissions are limited to 20% opacity under normal operation. Emissions (primarily VOC) are limited by limiting the board feet of production (facility-wide) and the kilns' heat inputs. No other controls are applied and emissions from the lumber drying kiln are emitted directly to atmosphere from the burner and multiple points of the kiln.

Wood fuel for these kilns is green (wet) waste yellow pine wood, primarily sawdust, from the facility with an average moisture content of 50% by weight. The facility processes yellow pine which has a higher heating value of 9,000 Btu per oven dry pound at 0% moisture.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum allowable process rate for this emission unit is the amount of wood processed that, when added to the wood processed by Emission Unit 022 (Kiln Nos. 1 and 2), does not exceed a facility-wide total of 170,112,000 board feet of lumber per consecutive 12-month period. For emissions testing purposes only, the maximum process rate of each kiln shall be 168,676 board feet of lumber per 24-hour period. The maximum allowable heat input rate is as follows:

Unit No.	MMBtu/hr Heat Input (24-hour average)	Fuel Type
041 Kiln No. 3	25.0	Carbonaceous fuel
041 Kiln No. 4	25.0	Carbonaceous fuel

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit 0630011-011-AC]

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

B.3. Methods of Operation (fuel). This emissions unit (Kiln Nos. 3 and 4) shall be fueled by carbonaceous fuel (wood waste) only. The kilns are each limited to a maximum heat input of 25 MMBtu/hr based on a 24-hour average and a wood waste heating value of 10.38 MMBtu/ton at 50% moisture by weight (20.76 MMBtu/ton, dry basis). [Rule 62-213.440, F.A.C., and permit 0630011-011-AC]
{Permitting Note: Wood fuel for these kilns is green (wet) waste yellow pine wood, primarily sawdust, from the facility with an average moisture content of 50% by weight.}

B.4. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year).

[Rule 62-210.200(PTE), F.A.C. and permit 0630011-011-AC]

Emission Limitations and Standards

Unless otherwise specified, the averaging time is based on the specified averaging time of the applicable test method.

B.5. Visible Emissions. Visible emissions shall not exceed 20% opacity under normal operation except for up to two minutes in any one hour at not more than 40% opacity. [Rule 62-296.410(2)(a), F.A.C., permit 0630011-011-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

B.6. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.; and permit 0630011-011-AC]

B.7. Excess Emissions Prohibited. 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 startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C., and permit 0630011-011-AC]

Monitoring of Operations

B.8. Operation and Maintenance (O&M) and Startup, Shutdown and Malfunction (SSM) Plan: Permittee shall operate the kilns in accordance with the following O&M and SSM Plan. (See Attachment: Kiln 3 and 4 Operation and Maintenance Plan for details.)

1. Prevention of over drying;
2. Ensure consistent moisture content; and
3. Drying at the minimum temperature.

Permittee may change the O&M and SSM plan by submitting a request in accordance with Rule 62-213.410(2), F.A.C., at least seven days prior to implementing the change.

[Rule 62-212.400(BACT), F.A.C., and 0630011-011-AC]

Test Methods and Procedures

See Appendix TR, Facility-Wide Testing Requirements: Frequency of Compliance Tests and Operating Rate During Testing for additional details.

B.9. Emissions Tests. Visible emissions (VE) tests are required to show compliance with the standards of the Department. [Rules 62-297.310(7)(a)4, 62-297.310(2) & (2)b, F.A.C.; and permit 0630011-011-AC]

B.10. Visible Emissions. The test method for visible emissions shall be DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with exceptions in Chapter 62-297, F.A.C. [Rules 62-296.410(3)(a) and 62-297.401(9)(c), F.A.C.]

B.11. 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.12. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each kiln in this EU shall be tested to demonstrate compliance with the emissions standards for VE. In addition to the annual compliance tests specified above, testing shall be scheduled the year before the facility's Title V permit renewal application is due so the results can be included with the submission of the application. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

B.13. Process Records. The owner or operator shall maintain records of the amount of lumber processed through each kiln in board-feet per month and per year. The records shall be available for inspection by the Department. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and permit 0630011-011-AC]

B.14. Fuel Records. The owner or operator shall maintain records of the fuel input in tons/hr and the heat input in MMBtu/hr and MMBtu/hr on a 24-hour average for each kiln. The records shall be available for inspection by the Department. [Rule 62-213.440(1)(b), F.A.C., and permit 0630011-011-AC]

B.15. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

40 CFR Part 63 Subpart DDDD. (NESHAP: Plywood and Composite Wood Products). These kilns are subject to the initial notification requirements in section 63.9(b) and the recordkeeping requirements of section 63.10(b)(1) of 40 CFR 63 Subpart DDDD.

B.16. 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. [40 CFR 63.2282 and 63.10(b)(2)(xiv) and Rule 62-204.800(11)(b)61, F.A.C.]

B.17. 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 five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.2283 and 63.10(b)(1) and Rule 62-204.800(11)(b)61, F.A.C.]

Combined Appendices:

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Abbreviations, Acronyms, Citations and Identification Numbers
Appendix I, List of Insignificant Emissions Units and/or Activities
Appendix RR, Facility-wide Reporting Requirements
Appendix TR, Facility-wide Testing Requirements
Appendix TV, Title V General Conditions
Appendix U, List of Unregulated Emissions Units and/or Activities
Kiln 1 and 2 Operation and Maintenance Plan
Kiln 3 and 4 Operation and Maintenance Plan

The following attachments are included for convenient reference:

Table H, Permit History
Air Permit Time Sensitive Action Chart