Title V Air Operation Permit Renewal
Permit No. 0630028-010-AV

APPLICANT

The applicant for this project is Spanish Trail Lumber Company, L.L.C. The applicant's responsible official and mailing address are: Mr. Ross Jackson, General Manager, Spanish Trail Lumber Company, L.L.C., Marianna Sawmill, 6112 Old Spanish Trail, Marianna, Florida 32448.

FACILITY DESCRIPTION

The applicant operates the Marianna Sawmill, which is located at 6112 Old Spanish Trail, Marianna, Florida in Jackson County.

This facility, which produces green rough dimensional lumber and dried dimensional lumber, consists of sawmill operations, kiln drying operations, planer mill, chipping operations and ancillary processes.

Logs are delivered via transport trucks and stacked in the log yard. Logs are conveyed through the ring debarker and then scanned by the log processing system for shape, size, and length. Each log is then "bucked" or cut to length based upon the computer's solution.

After bucking, the logs are conveyed to the primary breakdown machine. Log ends and logs of inferior quality are culled and sent to the Bush chipper and the chips generated are conveyed to the chip screens. Bark from the debarker is mechanically conveyed to the hammer hog. Hogged (coarsely ground) bark is mechanically conveyed to the bark bin and then loaded into bark trucks for shipment offsite. Bark and broken pieces from the log yard are gathered by front-end loaders and dumped onto the bark conveyor that feeds into the hammer hog.

Debarked logs pass across the transfer deck and are conveyed to the primary breakdown machine, which cuts the logs into rough dimensional lumber. The sideboards from the primary breakdown machine are conveyed to the edger, which can square the sides to make a smaller board. Lumber from the primary breakdown machine and edger moves to the landing table where boards of inferior quality are culled. Inferior boards that are large enough are sent back to the edger to be remanufactured into quality boards of smaller size and then sent back to the landing table. The lumber is then conveyed through the end trimmers, sorter, and stacker. The drop ends from the end trimmer are conveyed to the sawmill chipper. The green sawdust from the sawmill is mechanically conveyed to the sawdust bin and then transported via "walking floor" trucks to the fuel storage area, to be used as fuel in the dry Kiln burners, or loaded into trucks for shipment offsite. The stacked lumber is moved to rough green lumber storage to be dried or sold.

Lumber from rough green lumber storage is transported to one of the two direct-fired lumber dry batch Kilns. The burners' exhaust is used to dry the lumber. Kiln 1's burner has a capacity of 25 MMBtu/hr and burns clean dry wood waste. Kiln 2's burner has a capacity of 35 MMBtu/hr and burns green sawdust only. VOC's driven off the lumber exhaust to the atmosphere through vents in the roof of each Kiln. The Kiln burners are vented through a stack when there is no lumber charge. Each kiln has an average charge capacity of 163 thousand board feet per charge (MBF/charge) with an average charge time of 24 hours/charge for Kiln 1 and 29.2 hours/charge for Kiln 2. After the lumber is dried, it is transported to rough dry lumber storage.

Lumber from rough dry lumber storage is transported to the planer mill where it is sent through a high-speed planer for finishing as dimensional lumber. Shavings from the planer are pneumatically conveyed to the planer mill cyclone and then sent to the shavings storage bin or fuel silo. Overflow from the shavings truck bin falls onto a shavings pile to be loaded into trucks and sold as fuel. The planed lumber is mechanically conveyed from the planer to a grader where it is separated based on quality. The lumber is then end-trimmed, stacked, stenciled with the L-P logo, and shipped offsite.

Chips from the sawmill chipper, primary breakdown machine and Bush chipper are mechanically conveyed to the chip screens and sorted with a shaker screen. Oversized chips that do not pass through the screens are conveyed to the bark bin. Chips that pass through the top screen are conveyed to the chip truck bin and fines passing through the lower screen are routed to the sawdust bin.

As part of the chipping operations, tub grinders, which are large portable chippers, are brought on site once or twice a year to chip up the old logs and waste logs. Approximately 1,500 tons of material will pass through the grinder during this two to three week period each year.

The facility has a fuel depot, which contains three diesel tanks and a gasoline tank. The fuel depot is used for fueling onsite vehicles and rolling stock.

The facility also has one hydraulic oil storage tank and numerous small hydraulic oil reservoirs. In addition, there are a few miscellaneous processes involving the use of organic liquids. These include: parts washing units, knife sharpening solution, and paint storage for the stenciling operation.

Kiln 1 and Kiln 2 are regulated by 40 CFR 63 Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. 40 CFR 63.2231(a) states the subpart applies to "lumber kilns located at any facility". 40 CFR 63.2252 states "For process units not subject to the compliance options or work practice requirements specified in 40 CFR 63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in 40 CFR 63.9(b). Kiln 1 and Kiln 2 are not subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR 64 since there is no add-on emissions control equipment.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received January 15, 2013.

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 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 not 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 facilityis 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 units at the facility

PROJECT REVIEW

This permit renews Title V operation permit 0630028-007-AV, effective August 26, 2008. Title V revision permit 0630028-009-AV, effective April 29, 2009, incorporated a production increase from 59,495 MBF/year for Kiln 1 and 48,900 MBF/year for Kiln 2, to a combined increased production limit of 146,700 MBF/year for both kilns, authorized by permit 0630028-008-AC, issued July 9, 2008.

This permit has been reformatted with the Title V Initial/Revision/Renewal template.

CONCLUSION

This project renews Title V air operation permit 0630028-007-AV, which was issued on August 26, 2008. 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.