TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Pure Pine, LLC
Post Office Box No. 128
Williston, Florida 32696

Pure Pine
Facility ID No. 0750086-004

PROJECT

Project No. 0750086-004-AC
Application for Minor Source Air Construction Permit
Production Increase

COUNTY

Levy, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Management Program
Northeast District Office
8800 Baymeadows Way W., Suite 100
Jacksonville, Florida 32256

October 18, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Pure Pine, LLC is an existing Wood Processing Plant, which is categorized under Standard Industrial Classification Code No. 2426. The facility is located in Levy County at approximately 3 miles E of SR 41 in Williston, Florida. The UTM coordinates of the existing facility are Zone 17, 361.00 km East, and 3244.00 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act.
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This project authorizes the facility to increase heat input rate of the wood-fired burner and rotary dryer from 8.0 MMBtu/hr to a 16.0 MMBtu/hr. The facility will also add 2 or 3 additional electric shaving mills and an electric pelletizer.

Processing Schedule

October 1, 2013 Received the application for a minor source air pollution construction permit.

October 1, 2013 Requested additional information.

October 16, 2013 Received additional information; application complete.

2. APPLICATION REVIEW

Discussion of Emissions

Potential to Emit: Emissions factors from stack tests conducted at a similar facility are used to estimate potential emissions of the dryer. These emissions factors are considered more conservative since the tested unit has a higher heat input rate (20MMBtu/hr) and higher temperature (1400 °F), which is likely to emit more VOCs and HAPs from the drying process. The estimated emissions factors and the potential emissions are as shown below.

Pollutant (s)	Emissions Factor (lb/tons of shavings produced)	Emissions Rate (lb/hr)	Emissions Rate (ton/yr)
PM/PM10	1.33	1.3	5.8
SO2	0.03	0.03	0.1
NOx	0.3	0.3	1.3
CO	2.8	2.8	12.3
VOC	8.7	8.7	38.1
Methanol	0.047	0.05	0.2
Formaldehyde	0.038	0.04	0.2

Emissions based on: 8760 hours per year, 2000 lb per hour fuel rate, 8000 btu/lb HHV wood, 16 MMBtu/ hour heat rate and 1 ton per hour production rate.

All PM emissions from the electrical shavers and electrical pelletizer are fugitive and there is no control equipment.

STATE REQUIREMENTS

Visible emissions from this emissions unit shall not exceed 20 percent opacity except for 40 percent opacity for not more than 2 minutes in any one hour.

[Rule 62.296.410(2)(a), F.A.C.]

Other Requirements

Control Device. The cyclone shall be maintained in good operating condition and shall remain in place at all times during operation. If there is a malfunction on the control unit, the owner or operator shall immediately take corrective actions to minimize emissions. [Rule 62-4.070(3) F.A.C]

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Leslie Maybin is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.