Florida Department of Environmental Protection

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Secretary

PERMITTEE

Georgia-Pacific Wood Products LLC
223 Gordon Chapel Road
Hawthorne, FL 32640

Air Permit No. 1070015-025-AC
Permit Expires: October 11, 2016
Issue Date: October 11, 2011

Authorized Representative:
Ms. Teresa Davidson, Plant Manager

South Debarker Replacement Project

This air construction permit authorizes Georgia-Pacific Wood Products LLC to 1) construct a 475.56 ton per hour maximum design capacity ring debarker as the replacement of the existing 416.25 tons per hour maximum design capacity ring debarker operating as the South Debarker; 2) reduce operation of the existing North Debarker (416.25 tons per hour maximum design capacity), as a debarking unit, to times when maintenance is being performed on the new South Debarker; 3) add a new hydraulic power unit and process controls for the existing gang/slasher saws; and 4) upgrade the log soaking/steaming vat in-feed system used to transfer the cut-to-length logs (blocks) into the existing log soaking/steaming vats. The proposed work will be conducted at the Plywood/Composite Wood Products Plant in Hawthorne, FL. The facility is designated Standard Industrial Classification No. 2436. This existing facility is located at 223 Gordon Chapel Road, Hawthorne, Putnam County, FL; UTM Coordinates: Zone 17, 399.50 km East and 3273.80 km North; Latitude: 29° 35′ 30″ North and Longitude: 82° 02′ 15″ West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Christopher L. Kirts, P.E.
District Air Program Administrator

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 10/11/2011 (Date)

SUBSECTION A. FACILITY DESCRIPTION

The mill produces plywood and is categorized under the North American Industries Classification System (NAICS) code 321113 for Softwood Veneer & Plywood, Softwood Sawmill. The facility consists of three plywood veneer dryers, three presses, a wood-fired boiler that generates steam for use in the dryers, presses, and associated materials handling equipment.

Logs and glue are the primary raw materials used in the plywood panel production. The production process is composed of four principal manufacturing sub-processes:

1. The green end, which includes log handling, debarking, cutting, soaking/steaming vats, veneer lathes, and green veneer handling.
2. Veneer drying.
3. Glue line and pressing.
4. Finishing, which includes sawing, sanding, edge sealing, and shipping.

Logs are transported to the plant and temporarily stored in the log yard or wet deck. The logs are placed on the unscramble deck. From the unscramble deck, the logs are conveyed to either the North of South Debarker, which removes the bark from the logs. Bark is conveyed to a hog for processing, and is stored under cover for shipment offsite, or to the boiler fuel house. The debarked logs are conveyed to the slasher saw. This saw cuts the logs into approximately 8.5 foot long sections called blocks. The blocks are then conveyed to the log soaking/steaming vats, where they are soaked to condition them for peeling in the lathes.

The drying process consists of veneer dryers indirectly heated by steam from the boiler, and mechanical systems for moving the veneer through the dryers and onto the stacking bins. The exhaust gases from the hot zones of the dryers are directed to a regenerative thermal oxidizer (RTO) to destroy volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) released from the wood veneer.

Periodically market conditions may cause the mill to produce final panels with dry veneer manufactured at another facility. Dry veneer is conveyed to one of two glue lines for assembly into panels. Whole veneer sheets are placed on a conveyor, sprayed with glue, and alternated with core material to form panels. Panels are sent to a pre-press in a stack, followed by individual panel pressing in one of three presses, where the glue is thermally activated.

Pressed panels are trimmed to final size at the panel saw. Some panels are further processed by the tongue and groove machine, specialty saw, or the sander. Wood residuals are collected at various points during the production process and are either shipped offsite or stored in bins for use as fuel in the wood-fired boiler. Finished panels are stacked; some receive treatment with end and/or edge seals, oil, or logo and product information. The panels are then stored in the warehouse before being shipped offsite.

The existing facility consists of the following emissions units.

E.U. ID No.	Brief Description
001	Wood Fired Boiler
002	Skinner Saw System & Glue Line System
003	Sanding System
005	Nos. 1, 2, and 3 Veneer Dryers
007	Group 1 miscellaneous coating operations
008	Miscellaneous PCWP MACT affected sources that are not subject to the compliance options or work practice requirements specified in Sec. 63.2240. (Resin and glue tanks, Log soaking/steaming vats)
009	Log debarking operation: North and South Debarkers
---	Miscellaneous insignificant EUs and activities

PROJECT DESCRIPTION

The Hawthorne facility currently operates two, existing ring debarkers, North and South, that have been in service since 1982. Each debarker has a physical short-term and long-term design capacity of 416.25 tons/hr and 3,646,363 tons/yr, respectively. The percentage of operating time of the two debarkers is approximately 25/75, respectively. To improve the uptime of the debarking operations and reduce maintenance costs, the facility proposes to replace the South Debarker with a new debarker of increased design capacity (475.56 tons/hr and 4,165,871 tons/yr). The North Debarker was rebuilt in October 2009. At present, the facility is unable to process this quantity of logs as the facility is bottlenecked by the veneer dryers' (EU 005) permitted capacity. The total combined throughput of the new South Debarker and the existing North Debarker combined shall not exceed the tons of logs required per thousand square feet (Msf) of plywood produced (3/8" basis), i.e., shall not exceed the maximum log throughput of 1,011,044 tons per year.

The facility proposes to restrict the operation of the existing North Debarker, as a backup debarking unit, to times when maintenance is being performed on the new South debarker. The North debarker may also be operated when the existing slasher saws are not in operation or are down as the Debarkers are also capable of cutting logs to length.

The facility also proposes to replace the hydraulic power unit and process controls for the gang and slasher saws. The original cut-up design was developed for large diameter logs. However, smaller diameter logs are now being used at the facility and tend to cause the slasher saw setup process control system to malfunction. The proposed changes will allow the facility to process smaller logs without causing these malfunctions.

Once logs are debarked and processed through the slasher saws, the vat in-feed kickers transfer the cut-to-length logs (blocks) into the log soaking/steaming vats for conditioning. The facility is proposing to upgrade the vat in-feed system to better handle the smaller log blocks. The vat in-feed kicker system is not a regulated unit due to it not being a source of air emissions. However, the kickers impact the speed at which blocks are fed into the log soaking/steaming vats.

Pursuant to Rule 62-212.400, F.A.C., Georgia-Pacific Wood Products LLC provided information to show that the project will not result in an exceedance of the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the permit requires Georgia-Pacific Wood Products LLC to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

The proposed project will affect the following emissions unit(s).

E.U. ID No.	Brief Description
001	Wood Fired Boiler
008	The Log soaking/steaming vats of EU 008: Miscellaneous PCWP MACT affected sources that are not subject to the compliance options or work practice requirements specified in Sec. 63.2240. (Resin and glue tanks, Log soaking/steaming vats)
009	Log debarking operation: North and South Debarkers
---	Miscellaneous insignificant EUs and activities: • Nos. 1 or 2 Cutoff Saw • Gang/Slasher Saws • Lily Pad Chipper • Rechipper • Chip Bin Screen • Chip Bin and Truck Loading • Bark Separator Screen • Bark Bin and Truck Loading • Bark Shredder • Dry Waste Bin and Truck Loading • Mulch Hog • Plant Roadways

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is 904/256-1700.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. The Compliance Authority's telephone number is 904/256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions

   d. Appendix D. Common Testing Requirements

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]

7. Source Obligation:

   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V Air Operation Permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the replacement equipment. To apply for a Title V Air Operation Permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting and Compliance Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions unit(s).

E.U. ID No.	Brief Description
001	Wood Fired Boiler
008	Log soaking/steaming vats of EU 008: Miscellaneous PCWP MACT affected sources that are not subject to the compliance options or work practice requirements specified in Sec. 63.2240. (Resin and glue tanks, Log soaking/steaming vats)
009	Log debarking operation: North and South Debarkers
---	Miscellaneous insignificant EUs and activities: • Nos. 1 or 2 Cutoff Saw • Gang/Slasher Saws • Lily Pad Chipper • Rechipper • Chip Bin Screen • Chip Bin and Truck Loading • Bark Separator Screen • Bark Bin and Truck Loading • Bark Shredder • Dry Waste Bin and Truck Loading • Mulch Hog • Plant Roadways

Emission Unit No. 001, the log soaking/steaming vats of EU 008, EU 009, and the stated Miscellaneous affected insignificant EUs and activities are listed here because they may be affected by the changes made to EU No. 009 (installation of new South debarker). With the exception of the proposed work authorized below for EU Nos. 008, 009, and the gang and slasher saws, the named emissions units and activities are not being themselves modified under the terms of this project.

PROPOSED WORK

1. The permittee is authorized to conduct this project on the above cited Emissions Units as follows:
   - Replace the existing, 415.25 ton per hour South Debarker with a new 475.56 ton per hour debarker;
   - Replace the existing hydraulic power unit and process control system for the gang and slasher saws. The new hydraulic power unit shall be powered by an electric motor;
   - Upgrade the existing log soaking/steaming vat in-feed kicker system in order to handle smaller log blocks.

   [Application No. 1070015-025-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacities:

   a. North and South Debarkers: The maximum annual log throughput rate through the North and South Debarkers combined shall not exceed the rate equivalent to the wood veneer dryers' (EU 005) maximum annual capacity of 441,504 Thousand Square Feet per 12 month period, on a monthly average 3/8" basis[1]. The maximum equivalent tons of logs debarked in the North and South Debarkers combined shall not exceed 1,011,044 tons logs during any consecutive 12-month period.[2,3]

   [Rule 62-4.070(3), F.A.C.; Rule 62-212.400(12), F.A.C.; and Application No. 1070015-025-AC]

   b. Wood Fired Boiler: The proposed work shall not result in an increase in the permitted capacity of the wood fired boiler, i.e. shall not cause an exceedance of the 224 MMBTU per hour maximum heat input rate.

   [Rule 62-4.070(3), F.A.C.; Rule 62-212.400(12), F.A.C.; and Application No. 1070015-025-AC]

   [1] *Veneer dryers' (EU 005) Permitted Capacity is stated in Title V Operation Permit No. 1070015-022-AV as a maximum input rate that shall not exceed 50.4 Thousand Square Feet per hour on a monthly average 3/8" basis. The operating hours are not limited, i.e. 8,760 hrs/Yr.*

   [2] *Basis: Facility provided emission factor of 2.29 tons logs/Msf.*

   [3] *Upon completion of the installation of the new South Debarker, Emissions Unit 009 shall be classified as a regulated emissions unit [Rule 62-210.200(122),F.A.C. – Emission Limitation; Rule 62-210.200(PTE), F.A.C]*

3. Method of Operation:

   a. South Debarker: Upon completion of the installation of the new South Debarker, its hours of operation shall not be limited (i.e., 8760 hours per year).

   b. North Debarker: Upon completion of the installation of the new South Debarker and after initial operation, the Permittee shall restrict operation of the North Debarker, as a debarking unit, to during times of maintenance of the South Debarker. In this mode of operation, the North Debarker shall be restricted to back up operation only. The facility may operate the North debarker when the slasher saws are not in operation/are down as the Debarkers are also capable of cutting logs to length.

   [Rule 62-4.070(3), F.A.C.; Rule 62-212.300, F.A.C.; Rule 62-212.400(12), F.A.C.; and Rule 62-210.200(PTE), F.A.C.; Application information received August 16, 2011]

RECORD KEEPING REQUIREMENTS

4. North and South Debarkers - Log Throughput: The Permittee shall maintain records of the actual quantity (tons) of logs debarked in the North and South Debarkers on at least a calendar month basis. The Permittee shall determine a rolling, consecutive 12-month total from the monthly data. These records shall be kept onsite and available to Department personnel upon request.

   [Rule 62-4.070(3), F.A.C.]

REPORTING REQUIREMENTS

5. Actual Emissions Reporting: This permit is based on a hybrid test analysis that compared baseline actual emissions with projected actual emissions for existing units and potential emissions for new units. The project avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      (1) The name, address and telephone number of the owner or operator of the major stationary source;
      (2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
      (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
      (4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

Specific Condition No. 5 Continued:

d. For this project, the following are the estimated baseline actual emissions: PM – 63.37 tons/year; PM_{10} – 39.20 tons/year; $PM_{2.5}$ – 33.67 tons/yr; SO_2 -- 17.62 tons/year; NO_x – 178.52 tons/year; CO – 352.33 tons/year; VOC – 45.27 tons/year; and Pb -- 0.03 tons/year.

e. For this project, the following are the estimated maximum projected actual emissions: PM – 81.79 tons/year; PM_{10} – 47.88 tons/year; $PM_{2.5}$ – 41.65 tons/yr; SO_2 – 18.42 tons/year; NO_x – 188.38 tons/year; CO – 364.4 tons/year; VOC –50.65 tons/year; and Pb -- 0.03 tons/year.

f. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual emissions for the affected EUs and activities:

   1. The Permittee shall us the actual, annual veneer dryer throughput (thousand square feet of 3/8" plywood board), and the actual annual quantity (tons) of logs debarked in the North and South Debarkers, as applicable to determine the actual annual emissions for the affected emissions units and sources of this project.
   2. Unless otherwise approved by the Department, the Permittee shall use the same emissions factors for reporting the actual annual emissions as used in the application to establish baseline emissions.
   3. As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Application No. 1070015-025-AC; Rule 62-212.300(1)(e),F.A.C.; and Rule 62-210.370, F.A.C.]

APPLICABILITY OF PREVIOUS PERMITS

6. Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction and operation permits for this emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The Permittee shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

   [Rule 62-4.070, F.A.C.]