DRAFT PERMIT

PERMITTEE

Klausner Holding USA Inc.
1297 Professional Drive, Suite 202
Myrtle Beach, South Carolina 29577

Authorized Representative:
Mr. Michael Funk, Chief Executive Officer

Air Permit No. 1210468-001-AC
PSD-FL-417
Expires: June 30, 2017
Facility ID No. 1210468
Suwannee Mill
Suwannee County

PROJECT

This is the final air construction permit authorizing the construction of a 700 million board feet per year (MMBF/yr) lumber production facility. The new facility includes the following operations: log handling, debarking, sawing, sorting, heat production, lumber drying, planing, and shipping. The plant is categorized under Standard Industrial Classification (SIC) No. 2421, (Sawmills and Planing Mills, General) and is located approximately 1.5 miles east of the intersection of U.S. Highway 90 and 185th Road, northwest of Live Oak, in Suwannee County, Florida. The UTM coordinates of the facility are Zone 17, 297.600 kilometers (km) East and 3,360.700 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations which are defined in Appendix CF of Section 4 of this permit.

STATEMENT OF BASIS

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 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, including determinations of the Best Available Control Technology (BACT).

Upon issuance of this final permit, any party to this order has the right to seek judicial review under Section 120.68 F.S., 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 (Department) 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 Tallahassee, Florida
Division of Air Resource Management
Office of Permitting and Compliance
(Electronic Signature)

DRAFT PERMIT

DRAFT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents was made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Michael Funk, Klausner Holding USA Inc.: michael.funk@klausner-group.com
Michael Ballenger, P.E., Trinity Consultants: mballeng@trinityconsultants.com
Khalid AlNahdy, Administrator, DEP NED: khalid.alnahdy@dep.state.fl.us
Heather Ceron, EPA Region 4: ceron.heather@epa.gov
Catherine Collins, U.S. Fish and Wildlife Service: catherine_collins@fws.gov
Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us
Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

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.
(Electronic Signature)

DRAFT

PROPOSED PROJECT

The Suwannee Mill produces dimensional kiln dried lumber and timber byproducts consisting of bark, wood chips, sawdust, and dry shavings. When the facility is fully constructed, the mill has a maximum annual production capacity of 700 MMBF/yr. The mill processes tree-length green saw logs into dimensional lumber. Raw materials, finished lumber and saleable by-products are received and dispatched from the facility by truck or rail.

The mill will operate kilns that heat the green rough sawn lumber to reduce the moisture content to meet required finished product market specifications. The kilns are heated with hot water that is generated in four natural gas-fired boilers (46 million British thermal units per hour (MMBtu/hr)) and two biomass-fired boilers (120 MMBtu/hr). The biomass boilers are fired by untreated bark, wood chips, and sawdust that are byproducts of the mills operation. Clean, untreated woody biomass obtained from off-site sources may also be fired in the biomass boilers.

In the initial phase of construction, the mill will operate two natural gas fired boilers and one block of kilns with 12 or 16 kilns per block. When completed, the final mill will have six boilers, four blocks of drying kilns, two saw lines, two planer lines, four sorting lines, two storage silos, two debarking units, one biomass boiler ash silo, and five emergency generators.

Tree-length green saw logs are stockpiled after being received from trucks or rail cars. From stockpiles, green logs, with moisture content of approximately 50% or greater, are fed into the debarking units. After being debarked, the green logs are cut and the roots reduced. Bark removed from the logs is conveyed to a central storage area where it is either burned in the biomass boiler or shipped off site for sale. Debarked logs are conveyed out of the log processing building to be sorted by quality and size into concrete boxes. Sorted logs are then transferred by motored vehicle to intermediate storage stacks prior to being fed into the sawmill. Once the logs are cut into rough sawn lumber in the sawmill, it is trimmed, stacked, and conveyed by motored vehicle to the kilns. Kiln drying takes between 2.3 to 10 days while the moisture content of the wood is reduced to between 8 to 20%. Dried lumber is finished in the planer mill and trimmed before being sorted by grade and packaged for shipment.

This project consists of the following emissions units (EUs).

Facility ID No. 1210468	
EU No.	**Emission Unit Description**
001 and 002	Two Biomass Boilers
003 - 006	Four Natural Gas Boilers
007	Four Blocks of Drying Kilns
008	Two Planer Mill Lines with Two Dry Shaving Silos
009	Sorter Line and Trimmers
010	Biomass Boiler Fly Ash Silo
011	Log Storage, Processing, and Sawmills
012	Five Emergency Generators
013	Miscellaneous Storage Tanks

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

DRAFT

- The facility will operate units subject to New Source Performance Standards (NSPS) under Section 111 of the CAA and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) under Section 112 of the CAA.

DRAFT

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department. The mailing address for the Office of Permitting and Compliance is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits shall be submitted to the Office of Permitting and Compliance in the Division of Air Resource Management of the Department.

2. Compliance Authority: All documents related to compliance activities such as reports, tests and notifications shall be submitted to the Compliance Authority, which is the Air Resource Section of the Department's Northeast District Office at: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7577.

3. Appendices: The following Appendices are attached as part of this permit and must be complied with by the permittee:
   (a) Appendix ASME: American Society of Mechanical Engineers (ASME) Form for Abbreviated Efficiency Test.
   (b) Appendix BMP: Best Management Practices.
   (c) Appendix CC: Common Conditions.
   (d) Appendix CF: Citation Formats and Glossary of Common Terms.
   (e) Appendix CTR: Common Testing Requirements.
   (f) Appendix Db: NSPS Subpart Db - Small Industrial-Commercial-Institutional Steam Generating Units.
   (g) Appendix DDDDD: NESHAP Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters.
   (h) Appendix F: 40 CFR 75, Appendix F, Section 5 - Measurement of Boiler Heat Input Rate.
   (i) Appendix GC: General Conditions.
   (j) Appendix GP: NSPS and NESHAP General Provisions.
   (k) Appendix IIII: NSPS Subpart IIII - Stationary Compression Ignition Internal Combustion Engines.
   (l) Appendix ZZZZ: NESHAP Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines.

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: No emissions unit shall be constructed or 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. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more or if construction is not completed within a reasonable time. This provision does not apply to the time periods between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
   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)

DRAFT

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 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.

c. 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 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. Title V Permit: This permit authorizes specific new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V 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 Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

9. Unconfined Emissions of 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. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter. Reasonable precautions include the following:

   a. Paving and maintenance of roads, parking areas and yards;
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction and land clearing;
   c. Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;
   d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne;
   e. Landscaping or planting of vegetation;
   f. Use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter;
   g. Confining abrasive blasting where possible; and,
   h. Enclosure or covering of conveyor systems.

   In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice and the degree of reduction of emissions expected from a particular technique or practice. See also Appendix BMP. [Rule 62-296.320(4)(c), F.A.C.]

10. Excess Emissions: Except as required by specific conditions of this permit dealing with excess emissions with regard to individual emission units, the following conditions apply to excess emissions.

   a. Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing 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.

DRAFT

b. Malfunction: 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.

c. Authority: Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

d. Notification: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700, F.A.C.]

11. Objectionable Odors Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. The permittee shall submit an odor control plan (OCP) to the Compliance Authority no later than 90 days before the Suwannee Mill facility becomes operational that addresses the procedures and practices that will be used to control facility wide odors.
[Rule 62-296.320(2), F.A.C. and Rule 62-4.070, F.A.C. Reasonable Assurance]

{Permitting Note: An objectionable odor is defined in Rule 62-210.200(Definitions), F.A.C., as 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.}

12. Open Burning Prohibited: No person shall ignite, cause to be ignited or permit to be ignited any material which will result in any prohibited open burning as regulated by Chapter 62-256, F.A.C.; nor shall any person suffer, allow, conduct or maintain any prohibited open burning.
[Rule 62-256.300, F.A.C.]

13. General Visible Emissions Standard: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as 20% opacity. [Rule 62-296.320(4)(b) F.A.C., General Visible Emission Standard]

DRAFT

A. Biomass-Fueled Boilers (EU-001 and 002)

This section of the permit addresses the following emissions unit.

EU Nos. 001 and 002	Emission Unit Description
Description: Each boiler is a biomass-fueled Dutch oven boiler. Biomass is pushed by hydraulic ram onto a step grate system within an initial refractory-lined primary chamber of the boiler, where a three-stage process of drying, pyrolysis, and final combustion begins. In the first step, wet fuel is dried and heated by the combustion gases and radiation from the refractory-lined chamber. Next, the fuel undergoes a pyrolysis process, reducing the wood to hydrocarbon and carbon monoxide (CO) gases. Finally, the exhaust gases are carried into the secondary chamber, where the combustion process is completed with the introduction of secondary combustion air. The heat from the combustion process is recovered to generate the hot water used in the lumber drying kilns. The two biomass boilers will be built and brought on line after the four natural gas boilers. *Fuels*: The boilers will fire bark, wood chips, wood shavings, and sawdust residuals from lumber production. Also, clean, untreated woody biomass from third parties may be used as fuel. *Capacity*: The design heat input capacity is 120 MMBtu/hr. *Controls*: The efficient combustion of woody biomass in the boilers will minimize the formation of particulate matter (PM), nitrogen oxides (NO_X), CO and volatile organic compounds (VOC). The use of biomass will minimize HAP emissions. Selective non-catalytic reduction (SNCR) with urea injection to will be used to reduce NO_X emissions. Sulfur dioxide (SO_2) will be minimized by the use of low sulfur fuels. An electrostatic precipitator (ESP) will be used to remove PM from the exhaust gases. *Stack Parameters*: Flue gas from each boiler is discharged to the atmosphere through separate stacks with design heights of 150 feet and diameters of 4.1 feet. The flue gas exit temperature will be approximately 284 °F with a design volumetric flow rate of 45,470 actual cubic feet per minute (acfm). *Monitoring*: Visible emissions (stack opacity) will be monitored and recorded by a continuous opacity monitoring system (COMS) on each biomass boiler stack.	

{Permitting Note: In accordance with Rule 62-212.400, F.A.C., the Department established emissions standards for the biomass-fueled boilers that represent the Best Available Control Technology (BACT) for emissions of NO_X, PM, PM with a mean diameter of 10 micrometer (µm) or less (PM_{10}), PM with a mean diameter of 2.5 µm or less ($PM_{2.5}$), VOC, and CO. The biomass-fueled boilers are subject to the applicable federal provisions in Subpart Db of 40 CFR 60, which is adopted by reference in Rule 62-204.800, F.A.C. and provided in Appendix Db of this permit.}

EQUIPMENT

1. Construction of Dutch oven Biomass-Fueled Boilers: The permittee is authorized to construct two Dutch oven biomass-fueled boilers for hot water generation at the Klausner facility. The boilers include a hot water drum, superheater, economizer, air heater, ash hoppers, ducts, fuel feeding equipment, air-cooled condensing unit, air pollution control equipment, and other associated equipment.
   [Application No. 1210468-001-AC]

2. Air Pollution Control Equipment: To comply with the emission standards of this permit, the permittee shall install the following air pollution control equipment on each Dutch oven biomass boiler.

   a. PM Control Devices: The permittee shall design, install, operate and maintain multiple cyclones (multi-clones) and an ESP to remove PM from the flue gas exhaust and achieve the PM standards specified in this subsection. The combination of multi-clones and ESP shall have design control efficiency greater than 99.9%. The multi-clones and ESP shall be on line and functioning properly whenever the boiler is in operation in accordance with the manufacturer's recommendations.

   b. SNCR System: The permittee shall design, install, operate, and maintain a urea-based SNCR system to reduce NO_X emissions in the flue gas exhaust and achieve the NO_X emissions standards specified in this subsection. The SNCR shall be on line and functioning properly whenever the boiler is in operation in accordance with the manufacturer's recommendations.

c. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

{Permitting Note: Sulfur dioxide emissions will be minimized by the use of low sulfur biomass fuels. Good combustion practices (GCP) will be used to minimize CO and VOC emissions.}

[Application No. 1210468-001-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(PSD), F.A.C.]

PERFORMANCE RESTRICTIONS

3. Authorized Fuels: Each boiler is authorized to combust the following primary fuels: wood bark from log processing and wood chips; sawdust; and wood shavings from lumber milling process. The boilers are also authorized to combust clean, untreated woody biomass obtained from third parties that meet the fuel quality requirements specified in Appendix BMP of this permit. No fossil fuels shall be burned in the boilers. The following table identifies the estimated lower heating values (LHV) of each fuel type in terms of British thermal units per pound (Btu/lb) as received:

Fuel Type	Wood Bark	Wood Chips	Sawdust	Wood Shavings
LHV	4,536	3,651	3,183	6,876

[Application No. 1210468-001-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(PSD), F.A.C.]

4. Boiler Hot Water Output: The maximum hot water output from all fuel combinations for each biomass boiler is 241,454 gallons per hour (4-hour average). Curves relating hot water output rates to heat input rates for each biomass boiler shall be submitted to the Compliance Authority no later than 180 days after the Suwannee mill becomes operational. The performance curves shall be based on the water flow through each boiler and the input and output temperature of the water or other measurements which result in an equivalent relationship of heat input to hot water output approved by the Compliance Authority.
[Application No. 1210468-001-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(PSD), F.A.C.]

5. Hours of Operation: The hours of operation for each biomass boiler are not restricted (8,760 hours/year).
[Application No. 1210468-001-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(PSD), F.A.C.]

6. Good Combustion Practices (GCP): Some of the emission standards established by this permit rely solely on "good combustion practices" to reduce emissions. Therefore, all operators and supervisors shall be properly trained to operate the biomass boilers and pollution control systems in accordance with the guidelines and procedures established by each manufacturer. The training shall include good combustion practices as well as methods of minimizing excess emissions. [Rules 62-4.070(3), F.A.C. and 62-212.400(5), F.A.C.]

NSPS APPLICABILITY

7. NSPS Subpart Db: The biomass boilers are subject to the applicable provisions of NSPS Subpart Db in 40 CFR 60 for Industrial-Commercial-Institutional Steam Generating Units and provided in Appendix Db of this permit. For the biomass boilers, NSPS Subpart Db specifies limits for PM and opacity and requires a COMS. There is no NSPS NO_X emission limit since the boilers do not fire fossil fuels. The boilers are also exempt from the NSPS SO_2 emission limit since the uncontrolled SO_2 emission rate is 0.32 lb/MMBtu or less with the use of low sulfur biomass fuels. [40 CFR 60, NSPS Subpart Db]

NESHAP APPLICABILITY

8. Subpart DDDDD: The biomass boilers are subject to the applicable provisions of NESHAP Subpart DDDDD in 40 CFR 63 for Industrial, Commercial, and Institutional Boilers and Process Heaters for major sources of HAP. *{Permitting Note: On January 9, 2012, the District of Columbia Circuit Court vacated EPA's stay of the final Subpart DDDDD provisions (dated March 21, 2011). Currently, the biomass boilers will have to meet the applicable requirements of the March 21st version, which specifies emissions limits for PM, hydrogen chloride (HCl), mercury (Hg), CO and dioxin/furans (D/F). However, the EPA is currently finalizing a revised version of Subpart DDDDD (dated December 23rd, 2011). If the December 23rd version*

becomes final, the biomass boilers will have to meet these revised requirements, which specify emission limits for PM, HCl, Hg, and CO. Dioxin/furan emissions are controlled by work practice standards. The pertinent portions of each Subpart DDDDD version are provided in Appendix DDDDD of this permit.}
[Application No. 1210468-001-AC and NESHAP 40 CFR 63, Subpart DDDDD]

EMISSIONS STANDARDS

9. Emission Limits: Emissions from each biomass boiler shall not exceed the following standards. The biomass boilers shall comply with the final NESHAP version adopted by EPA when the boilers become operational. Limits in terms of "lb/MMBtu" are based on the heat input rate unless otherwise noted.

Pollutant	Initial (I) or Annual (A) Test[b]		CEMS/COMS Based Averages[b]	Basis
NO_X[a]	0.14 lb/MMBtu	(I,A)	N/A	BACT
SO_2[c]	0.036 lb/MMBtu[d]	FM[d]	N/A	Reasonable Assurance
CO	0.40 lb/MMBtu	N/A	N/A	BACT
	470 ppmvd @ 3% O_2[e]	(I/A)	N/A	NESHAP1[g] BACT[g]
	810 ppmvd[f]	(I,A)	N/A	NESHAP2[g]
	N/A	N/A	440 ppm 10-day rolling CEMS average (alternative limit)[f]	
PM[h]	0.015 lb/MMBtu	(I,A)	N/A	BACT
	0.0011 lb/MMBtu[i]			NESHAP1 BACT
	0.036 lb/MMBtu[j]			NESHAP2
$PM_{10}/PM_{2.5}$[k]	0.032 lb/MMBtu	(I)	N/A	BACT
VOC	0.017 lb/MMBtu	(I)	N/A	BACT
VE[l]	N/A	N/A	Shall maintain opacity to less than or equal to 10 percent opacity (daily block average)	BACT 62-296.406 62-296.410 NESHAP2 NESHAP1
HCl	0.0022 lb/MMBtu[m]	(I,A)	N/A	NESHAP1
	0.022lb/MMBtu[n]	(I,A)		NESHAP2
Hg	3.5×10^{-6} lb/MMBtu[o]	(I,A)	N/A	NESHAP1
	8.60×10^{-7}lb/MMBtu[p]	(I,A)		NESHAP2
D/F	0.2 ng/dscm @ 7% O_2[q]	(I/A)	N/A	NESHAP1
	Work Practice Standards[r]	N/A		NESHAP2

a. The NO_X limit in terms of "lb/MMBtu" is based on BACT determination. Biomass boilers are exempt from NSPS Subpart Db NO_X limit per §60.44b(l)(1) since the boilers fire no fossil fuels. Only record keeping of fuels used in the boilers required per §60.49b of NSPS Subpart Db.

b. The unit "ppm" means parts per million. The unit "O_2" means oxygen. N/A means not applicable.

c. The SO_2 limit in terms of "lb/MMBtu" will ensure that the biomass boilers meet the SO_2 emission limit exemption in §60.42b(k)(2) of NSPS Subpart Db. A "state" BACT is required for SO_2 in accordance

DRAFT

with Rule 62-296.406(3), F.A.C for Fossil Fuel Steam Generators with Less than 250 MMBtu/hr Heat Input. This requirement is met by firing only low sulfur biomass fuels in the boilers.

d. Quarterly fuel monitoring of the sulfur content of the biomass fuels is in accordance with §60.49b(r) of NSPS Subpart Db. Fuel sulfur monitoring negates the need to install an SO_2 CEMS by showing uncontrolled SO_2 emissions are 0.32 lb/MMBtu or less (NSPS standard). To avoid PSD preconstruction review for SO_2, the annual average sulfur content of all biomass fuels shall be less than an equivalent SO_2 emission rate of 0.036 lb/MMBtu of heat input. Vendor certification of biomass fuel sulfur content can be used for fuels obtained from off-site sources.

e. As an option, there is an alternative NESHAP emission limit of 0.45 lb/MMBtu of heat output. If the March 21, 2011 version of final NESHAP1 Subpart DDDDD is effective when the biomass boilers become operational, then BACT for CO emissions becomes this NESHAP emissions limit of 470 ppmvd which is equivalent to approximately 0.38 lb/MMBtu of heat input.

f. Complying with the BACT limit of 0.40 lb CO MMBtu/hr demonstrates compliance with the 810 ppmvd limit (NESHAP2). As an option, the permittee could elect to install a CO CEMS and comply with an alternative NESHAP2 limit of 440 ppm 10-day rolling CEMS average. Other alternative NESHAP2 limits are 0.89 lb/MMBtu of heat output or 8.9 lb per megawatt hour (lb/MWh).

g. NESHAP1 refers to the March 21, 2011 final version of NESAHP Subpart DDDDD. NESHAP2 refers to the December 23, 2011 version of NESHAP Subpart DDDDD if it becomes final and effective.

h. The PM limit includes the filterable portion only. Compliance with this limit ensures compliance with the NSPS Subpart Db limit of 0.030 lb/MMBtu.

i. If the March 21, 2011 version of final NESHAP1 Subpart DDDDD is effective when the biomass boilers become operational, then BACT for PM emissions becomes the NESHAP emissions limit of 0.0011 lb/MMBtu of heat input.

j. If the December 23, 2011 version of final NESHAP2 Subpart DDDDD is effective when the biomass boilers become operational, then BACT for PM emissions is 0.015 lb/MMBtu of heat input. As an option, an alternative NESHAP2 limit is 4.1×10^{-5} lb/MMBtu of heat input for total select metals. Other optional alternative NESHAP limits are: 0.05 lb PM/MMBtu or 0.51 lb PM/MWh; total select metals 5.5×10^{-5} lb PM/MMBtu or 5.8×10^{-4} lb PM/MWh.

k. The limits for PM_{10} and $PM_{2.5}$ include filterable and condensable portions. Initial compliance shall be demonstrated by stack tests. Thereafter, compliance will be assumed if compliance is demonstrated with the BACT PM limit of 0.015 lb/MMBtu.

l. The permittee must meet the work practice standard requirements of the applicable NESHAP during periods of startup, shutdown and malfunction. A work practice standards plan to minimize emissions during these periods shall be submitted to the Compliance Authority for approval no later than 180 days prior to boiler startup.

m. An alternative NESHAP limit is 0.21 lb/MMBtu of steam output.

n. An alternative NESHAP limit is 0.25 lb/MMBtu of steam output.

o. An alternative NESHAP limit is 3.4×10^{-6} lb/MMBtu of steam output.

p. An alternative NESHAP limit is 9.4×10^{-7} lb/MMBtu of steam output.

q. The unit "ng/dscm at 7% O_2" means nanograms per dry standard cubic meter corrected to 7% oxygen. An alternative NESHAP limit is 1.8×10^{-10} lb/MMBtu toxic equivalents (TEQ).

r. Dioxin/furan emissions are managed by work practice standards. Work practice standards consists of a tune-up of the boiler annually as specified in § 63.7540.

DRAFT

[Application No. 1210468-001-AC; Rules 62-4.070(3)(Reasonable Assurance), 62-212.400(BACT), 62-296.406 (Small Boiler BACT), and 62-296.410(Carbonaceous Fuel Firing Equipment), F.A.C.; 40 CFR 60, NSPS Subpart Db; and 40 CRF 63, NESHAP Subpart DDDDD]

10. Continuous Monitoring Requirements: The permittee shall install, calibrate, maintain and operate a COMS to measure and record opacity from each biomass boiler stack in a manner sufficient to demonstrate continuous compliance with the COMS-based emission standards in **Conditions 9** above. In accordance with 40 CFR 60.48b(a) the permittee shall install, calibrate, operate and maintain a COMS to continuously monitor and record opacity from the steam generating unit. The COMS shall be certified pursuant to 40 CFR 60 Appendix B, Performance Specification 1. Each COMS shall be installed, calibrated and properly functioning within 60 calendar days of achieving permitted capacity as defined in Rule 62-297.310(2), F.A.C., but no later than 180 calendar days after initial startup and prior to the initial performance tests. Within one working day of discovering emissions in excess of the opacity standard (and subject to the specified averaging period), the permittee shall notify the Compliance Authority. [Rules 62-212.400(BACT), 62-210.200(PTE), and 62-4.070(3), F.A.C.; and 40 CFR 60, NSPS Subpart Db and Appendices]

STARTUP, SHUTDOWN, AND MALFUNCTION REQUIREMENTS

11. Malfunction Notifications: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with the following. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately (within one working day) notify the Compliance Authority. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. If requested by the Compliance Authority, the owner or operator shall submit a quarterly written report describing the malfunction. [Rules 62-210.700(6) and 62-4.130, F.A.C.]

12. Excess Emissions Allowed – Opacity Requirements: As provided by the authority in Rule 62-210.700(5), F.A.C., the following requirements supersede the provisions in Rule 62-210.700(1), F.A.C. The permittee must meet the work practice standard requirements of the applicable NESHAP during periods of startup, shutdown and malfunction. A work practice standards plan to minimize emissions during these periods shall be submitted to the Compliance Authority for approval no later than 180 days prior to boiler startup. [Rule 62-210.700(5), 62-210.200(PTE); Rule 62-212.400(10) (PSD), Control Technology Review; and Rule 62-4.070(3), F.A.C.; 40 CFR 63 Subpart DDDDD]

TESTING REQUIREMENTS

13. Boiler Performance Test: Within 180 days of first fire on the primary biomass fuels, the permittee shall conduct a test to determine the boiler thermal efficiency. The test shall be generally conducted in accordance with the abbreviated version of ASME PTC 4, 1998 (See Appendix ASME of this permit). The abbreviated test procedure shall be agreed upon by all parties. As an alternative, the procedures given in Appendix F of this permit may be used to calculate boiler heat input. The test shall be conducted when firing only the primary biomass fuels with as close of fuel mix and heating values to the boiler design fuel mix and heating value as practical and shall be at least three hours long. The boiler hot water conditions and production rate shall be monitored and recorded during the test. The primary fuel firing rates in tons per hour shall be calculated and recorded based on the hot water parameters. A sample of the as-fired biomass shall be analyzed for the heating value (Btu/lb) and moisture content (%). The actual heat input rate (MMBtu/hour) shall be determined by the hot water parameters (enthalpies) and the measured thermal efficiency. Results of the test shall be submitted to the Compliance Authority within 45 days of completion. The boiler thermal efficiency test shall be repeated during the 12-month period prior to renewal of any operation permit. If the tested boiler thermal efficiency is less than 90% of the design boiler thermal efficiency, then the tested thermal efficiency shall be used in any future calculations of the heat input rate until a new test is conducted.

DRAFT

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

14. Initial and Annual Stack Tests: In accordance with test methods specified in this permit, the biomass boilers shall be tested to demonstrate initial compliance with the emission standards CO, NO_X, $PM/PM_{10}/PM_{2.5}$, VOC, opacity, and, if applicable, Hg, D/F and HCl. The tests shall be conducted within 60 days after achieving the maximum heat input rate to each boiler, but not later than 180 days after the initial startup of each boiler. Subsequent annual compliance stack tests for CO, NO_X, PM, VOC shall also be conducted during each federal fiscal year (October 1st to September 30th). If applicable, stack tests for Hg, D/F and HCl shall be conducted in accordance with the schedule specified in the NESHAP. Tests shall be conducted between 90% and 100% of the maximum heat input rate when firing only the primary fuels. COMS data for opacity shall be reported for each run of the required stack. The Department may require the permittee to repeat some or all of these stack tests after major replacement or major repair of any air pollution control or process equipment. [Rules 62-212.400(5)(c) and 62-297.310(7)(a) and (b), F.A.C.; 40 CFR 60.8]

    {Permitting Note: All tests must be conducted between 90% and 100% of permitted capacity; otherwise, this permit will be modified to reflect the true maximum capacity as constructed.}

15. Work Practice Standards: Records shall be kept on site documenting all a work practice standards required by NESHAP 40 CFR 63, Subpart DDDDD. [Application No. 1210468-001-AC; Rule 62-212.400(10) (PSD), Control Technology Review; and NESHAP 40 CRF 63, Subpart DDDDD]

16. Test Methods: Any required stack tests shall be performed in accordance with the following methods.

EPA Method	Description of Method and Comments
1 - 4	Determination of Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content *{Notes: Methods shall be performed as necessary to support other methods.}*
5	PM
7E	Measurement of NO_X Emissions (Instrumental)
9	Visual Determination of the Opacity
10B	Measurement of CO Emissions (Instrumental) *{Note: The method shall be based on a continuous sampling train.}*
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) *{Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the THC emissions measured by Method 25A.}*
19	Calculation Method for NO_X, PM, and SO_2 Emission Rates
23	Determination of Polychlorinated Dibenzo-p-dioxins and Polychlorinated Dibenzofurans from Municipal Waste Combustors
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Measurement of Gaseous Organic Concentrations (Flame Ionization)
26	Determination of Hydrogen Chloride (HCl) Emissions from Stationary Sources
29	Determination of Metals Emissions from Stationary Sources
201	Determination of PM_{10} Emission (Exhaust Gas Recycle Procedure)
201A	Determination of PM_{10} and $PM_{2.5}$ Emission from Stationary Sources (Constant Sampling Rate Procedure)
202	Dry Impinger Methods for Determining Condensable Particulate Emissions from Stationary Sources

The methods are specified in Appendix A of 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Compliance Authority. [Rules 62-204.800, F.A.C. and 40 CFR 60, Appendix A]

DRAFT

OTHER MONITORING REQUIREMENTS

17. Hot Water Parameters: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain continuous monitoring and recording devices for the following parameters: inlet water temperature (°F), outlet water temperature, water flow rate and water pressure (psig). Records shall be maintained on site and made available upon request. [Rules 62-4.070(3) and 62-212.400(5), F.A.C.]

18. SNCR Urea Injection: In accordance with the manufacturer's specifications, the permittee shall install, calibrate, operate and maintain a flow meter to measure and record the urea injection rate for the SNCR system for each biomass boiler. The permittee shall operate at a urea injection rate that ensures compliance with the NO_X emissions standard. Urea injection records shall be maintained on site and made available upon request. [Rules 62-4.070(3) and 62-212.400(5), F.A.C.]

19. Fuel Monitoring Plan Requirements: In accordance with NSPS Subpart Db in 40 CFR 60, the permittee shall develop a fuel monitoring plan to demonstrate compliance sulfur emission. A quarterly sample of biomass fuels shall be taken, analyzed for the sulfur content and heating value, and reported in terms of "lb SO_2/MMBtu of heat input". Records shall be maintained on site and made available upon request. The fuel monitoring plan shall be submitted to the Administrator for review and approval no later than 60 days before the date you intend to demonstrate compliance.
[Rules 62-4.070(3) and NSPS Subpart Db, 40 CFR 60]

RECORDS AND REPORTS

20. Stack Test Reports: In addition to the information required in Rule 62-297.310(8), F.A.C., each stack test report shall also include the following information: water inlet temperature, water outlet temperature, water flow rate (gal/hr), water pressure, heat input rate (MMBtu/hour), calculated authorized fuels firing rate (tons/hour), and emission rates in terms of the applicable standards. [Rule 62-4.070(3), F.A.C.]

21. Monthly Operations Summary: By the tenth calendar day of each month, the permittee shall record the following parameters for each biomass boiler in a written or electronic log for the previous month of operation: hours of operation, tons of biomass, and total hot water flow volume and the updated 12-month rolling totals for each of these operating parameters. In addition, the hourly hot water flow rate from each biomass boiler shall be recorded and reported. The Monthly Operations Summary shall be maintained on site and made available for inspection when requested by the Department. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

22. Quarterly Opacity Emissions Report: Within 30 days following the end of each quarter, the permittee shall submit a report to the Compliance Authority summarizing opacity including periods of startups, shutdowns, malfunctions and COMS monitor availability for the previous quarter. If opacity COMS data is excluded from a compliance determination during the quarter due to a malfunction, the permittee shall include a description of the malfunction, the actual emissions recorded, and the actions taken to correct the malfunction. See Appendix CTR of this permit for the reporting format.
[Rules 62-4.070(3), and 62-4.130 F.A.C.]

DRAFT

B. Natural Gas Fired Boilers (EU-003, 004, 005, and 006)

This section of the permit addresses the following emissions units.

EU ID Nos. 003 - 006	Emission Unit Description
Description: The four natural gas boilers are used to generate the hot water that is used in the lumber kiln drying process. Two boilers each share a common stack for a total of two stacks. In the initial phase of construction, two natural gas fired boilers will supply hot water to one block of kilns. As other kiln blocks are completed, the two other natural gas boilers will be constructed and brought online. Finally, the two biomass boilers will be built and brought on line. *Fuels*: The boilers are fueled solely by natural gas. Combined natural gas usage in all four boilers is limited to a total of 1,360 million cubic feet in any consecutive 12 month period. *Capacity*: The design heat input capacity of each natural gas fired boiler is 46 MMBtu/hr. *Controls*: Efficient combustion of natural gas and GCP will be used to minimize the emissions of PM, NO_X, CO, VOC, opacity and HAP. Low NO_X burners and flue gas recirculation (FGR) further minimize NO_X emissions. *Stack Parameters*: Flue gas from the natural gas boilers (two per stack) discharge to the atmosphere through stacks with design heights of 100 feet and design diameters of 3.61 feet. The flue gas exit temperature is approximately 401 °F with a design volumetric flow rate of 30,200 acfm. *CEMS/COMS*: None. *Applicability of 40 CFR Subpart Dc (NSPS Subpart Dc)*: This unit is subject to NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to steam generating units with a maximum heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr.	

EQUIPMENT

1. Construction of Four Natural Gas Fueled Boilers: The permittee is authorized to construct four natural gas fired boilers for hot water generation. The boilers include an air supply, low NO_X burners, FGR and other associated equipment. [Application No. 1210468-001-AC]

2. Air Pollution Control Equipment: To comply with the emission standards of this permit, the permittee shall install the following air pollution control equipment on the natural gas boilers.

   a. Low NO_X Burners: The permittee shall design, install, operate and maintain low NO_X burners on the boilers to achieve the NO_X standards specified in this subsection.

   b. Flue Gas Recirculation (FGR): The permittee shall design, install, operate, and maintain a FGR system on the boilers to reduce NO_X emissions in the flue gas exhaust and achieve the NO_X emissions standards specified in this subsection.

   {Permitting Note: Emissions of SO_2 will be minimized by the firing natural gas. Natural gas and GCP will be used to control emissions of PM, NO_X, CO, VOC, VE and HAP to the limits specified in this subsection.}

   [Application No. 1210468-001-AC; Rules 62-212.400(BACT), 62-4.070(3), and 62-210.200(PTE), F.A.C.]

PERFORMANCE RESTRICTION

3. Authorized Fuels: The boilers are authorized to only combust natural gas. The combined natural gas usage in all four boilers shall be limited to a total of 1,360 million cubic feet in any consecutive 12 month period. Natural gas flow meters shall be installed on each boiler to measure and record the volume of gas burned per hour. Records of the gas combusted shall be maintained on site and available for inspection by the Compliance Authority. [Application No. 1210468-001-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

4. Boiler Hot Water Output: The maximum hot water output for each natural gas fired boiler is 120,727gallons per hour (4-hour average). Performance curves relating hot water output to heat input from each natural gas boiler shall be submitted to the Compliance Authority no later than 180 days after the Suwannee mill becomes operational. The heat input curves shall be based on the water flow through each boiler and the input and output temperature of the water or other measurements which result in an equivalent relationship of heat input to hot water output approved by the Compliance Authority.
   [Application No. 1210468-001-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(PSD), F.A.C.]

DRAFT

5. Operational Hours: The hours of operation of each natural gas boiler are not restricted (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

NSPS APPLICABILITY

6. NSPS Subpart Dc: The natural gas boilers must meet all applicable requirements of NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units. The applicable portions of Subpart Dc are contained in Appendix Dc of this permit. For the natural gas boilers at the Suwannee mill, records must be kept and maintained of the amount of natural gas combusted during each calendar month. The facility must submit notification of the date of initial startup per §60.48c(a), as provided by §60.7. This notification must include the design heat input capacity of the four natural gas boilers and identification of the fuels to be combusted. Additional notifications of commencement of construction and performance testing notifications and reports are also required by §60.7.
[Application No. 1210468-001-AC and 40 CFR 60, NSPS Subpart Dc]

NESHAP APPLICABILITY

7. NESHAP Subpart DDDDD: The natural gas boilers at the Klausner facility are subject to NESHAP Subpart DDDDD in 40 CFR 63 for Industrial, Commercial, and Institutional Boilers and Process Heaters for major sources of HAP. The pertinent portions of each Subpart DDDDD are contained in Appendix DDDDD of this permit. *{Permitting Note: On January 9, 2012, the District of Columbia Circuit Court vacated EPA's stay of the final Subpart DDDDD provisions (dated March 21, 2011). Currently, the biomass boilers will have to meet the applicable requirements of the March 21st version; however, the EPA is currently finalizing a revised version of Subpart DDDDD (dated December 23rd, 2011). If the December 23rd version becomes final, the biomass boilers will have to meet these revised requirements. The requirements of both the final and proposed NESHAP Subparts DDDDD with regard to natural gas fired boilers involve work practice standards involving boiler tune-ups. The pertinent portions of each Subpart DDDDD version are provided in Appendix DDDDD of this permit.}*
[Application No. 1210468-001-AC and NESHAP 40 CFR 63, Subpart DDDDD]

EMISSIONS STANDARDS

8. Emission Limits: Emissions from each pair of natural gas boilers sharing a common stack at the Suwannee mill shall not exceed the standards given in the table below. Unless otherwise stated, averaging time is the time of the test method. The heat input rate for emission limit calculations shall be the combined rate for each boiler sharing a common stack as measured by the natural gas flow to each boiler during stack testing.

Pollutant	Emission Limit (lb/MMBtu)	Test Frequency	Basis
NO_X	0.036 lb/MMBtu	(I)	BACT
SO_2	2 gr of S/100 scf	FM[b]	Reasonable Assurance
CO	0.039 lb/MMBtu	(I,A)	BACT
$PM/PM_{10}/PM_{2.5}$[c]	2 gr of S/100 scf	FM[b]	BACT
VOC	0.003 lb/MMBtu	(I)	BACT
Opacity[d]	10% opacity (6-minute blocks) except for up to 20% opacity for one, 6-minute block per hour	(I,A)	Reasonable Assurance
Conduct a tune-up of the boiler annually as specified in § 63.7540			NESHAP1[e]
Conduct a tune-up of the boiler annually as specified in § 63.7540. Units in the Gas 1 subcategory will conduct this tune-up as a work practice for all regulated emissions under this subpart.			NESHAP2[e]

DRAFT

a. Initial (I) and (A) annual stack tests.

b. "FM" means fuel monitoring to demonstrate that the sulfur content of the natural gas is 2 grains per hundred standard cubic foot (gr/100 scf) or less. Vendor certification can be used in lieu of FM.

c. The fuel sulfur specification and the visible emissions standard represent BACT for $PM/PM_{10}/PM_{2.5}$. The estimated filterable PM emissions rate is 0.002 lb/MMBtu.

d. The opacity limits applies during normal operation of each boiler. During startups and shutdowns opacity shall not exceed 20% opacity (6-minute blocks) except for one 6-minute block per hour of 27%.

e. NESHAP1 refers to the March 21, 2011 final version of NESAHP Subpart DDDDD. NESHAP2 refers to the December 23, 2011 version of NESHAP Subpart DDDDD if it becomes final and effective.

[Application No. 1210468-001-AC; Rule 62-212.400(BACT), F.A.C.; NSPS Subpart Dc, 40 CFR 60; NESHAP Subpart DDDDD, 40 CRF 63]

STARTUP, SHUTDOWN, AND MALFUNCTION REQUIREMENTS

9. Malfunction Notifications: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with the following. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately (within one working day) notify the Compliance Authority. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. If requested by the Compliance Authority, the owner or operator shall submit a quarterly written report describing the malfunction.
[Rules 62-210.700(6) and 62-4.130, F.A.C.]

TESTING REQUIREMENTS

10. Boiler Performance Test: Within 180 days of first fire on natural gas; the permittee shall conduct a test to determine the boiler thermal efficiency. The test shall be conducted in general abbreviated accord with ASME PTC 4, 1998 (See Appendix ASME of this permit). The abbreviated test procedure shall be agreed upon by all parties. As an alternative, the procedures given in Appendix F of this permit may be used to calculate boiler heat input. The test shall be conducted when firing natural gas and shall be at least three hours long. The hot water flow rate, inlet and outlet water temperatures and water pressure shall be monitored and recorded during the test. The natural gas firing rate in cubic feet per minute shall be measured and recorded. The heat input rate (MMBtu/hour) shall be based on the natural gas volume flow rate and the vendor certified heat content of natural gas in Btu/ft^3. Results of the test shall be submitted to the Compliance Authority within 45 days of completion. The boiler thermal efficiency test shall be repeated during the 12-month period prior to renewal of any operation permit. If the tested boiler thermal efficiency is less than 90% of the design boiler thermal efficiency, then the tested thermal efficiency shall be used in any future calculations of the heat input rate until a new test is conducted.
[Applicant's Request; Rule 62-4.070(3), F.A.C.]

11. Initial and Annual Stack Tests: In accordance with test methods specified in this permit, the natural gas fired boilers shall be tested to demonstrate initial compliance with the emission standards for CO, NO_X, VOC and opacity. The tests shall be conducted within 60 days after achieving the maximum heat input rate to the boiler, but not later than 180 days after the initial startup of the boiler. Subsequent compliance stack tests for CO and opacity shall also be conducted during each federal fiscal year (October 1st to September 30th). Tests shall be conducted between 90% and 100% of the maximum heat input rate when firing only the primary fuels. The Department may require the permittee to repeat some or all of these initial stack tests after major replacement or major repair of any air pollution control or process equipment.
[Rules 62-212.400(5)(c) and 62-297.310(7)(a) and (b), F.A.C.; 40 CFR 60.8]

DRAFT

{Permitting Note: All initial tests must be conducted between 90% and 100% of permitted capacity; otherwise, this permit will be modified to reflect the true maximum capacity as constructed.}

12. Work Practice Standards: Records shall be kept on site documenting the annual tune-up required for each natural gas fired boiler as a work practice standard by NESHAP 40 CFR 63, Subpart DDDDD. The tune-up of each boiler shall be conducted as specified in § 63.7540.
[Application No. 1210468-001-AC; Rule 62-212.400(BACT), F.A.C.; NSPS Subpart Dc, 40 CFR 60; and NESHAP Subpart DDDDD, 40 CRF 63]

13. Test Methods: Any required stack tests shall be performed in accordance with the following methods.

EPA Method	Description of Method and Comments
1 - 4	Determination of Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content *{Notes: Methods shall be performed as necessary to support other methods.}*
7E	Measurement of NO_X Emissions (Instrumental)
9	Visual Determination of the Opacity
10B	Measurement of CO Emissions (Instrumental) *{Note: The method shall be based on a continuous sampling train.}*
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) *{Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the THC emissions measured by Method 25A.}*
19	Calculation Method for NO_X, PM, and SO_2 Emission Rates
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Measurement of Gaseous Organic Concentrations (Flame Ionization)

The test methods are specified in Appendix A of 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Compliance Authority.
[Rules 62-204.800, F.A.C. and 40 CFR 60, Appendix A]

OTHER MONITORING REQUIREMENTS

14. Hot Water Parameters: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain continuous monitoring and recording devices for the following parameters: hot water flow rate, inlet water temperature (°F), outlet water temperature and water pressure (psig). Records shall be maintained on site and made available upon request.
[Rules 62-4.070(3) and 62-212.400(5), F.A.C.

15. Fuel Flow Meters: A fuel flow meter shall be installed on each natural gas fired boilers to record the volume of natural gas used in each boiler on an hourly, monthly and 12-month rolling total basis.
[Rule 62-4.070(3), Reasonable Assurance]

RECORDS AND REPORTS

16. Stack Test Reports: In addition to the information required in Rule 62-297.310(8), F.A.C., each stack test report shall also include the following information: hot water flow rate (gal/hour), inlet and outlet water temperature, water pressure, heat input rate (MMBtu/hour), natural gas firing rate in cubic feet per hour and emission rates (lb/MMBtu).
[Rule 62-4.070(3), F.A.C.]

17. Monthly Operations Summary: By the tenth calendar day of each month, the permittee shall record the following in a written or electronic log for the previous month of operation: hours of operation, cubic feet of natural gas, hot water volume and the updated 12-month rolling totals for each of these operating parameters.

DRAFT

B. Natural Gas Fired Boilers (EU-003, 004, 005, and 006)

The Monthly Operations Summary shall be maintained on site and made available for inspection when requested by the Department.
[Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

DRAFT

C. Drying Kilns (EU-007)

This section of the permit addresses the following emissions unit.

EU ID No. 007	Emission Unit Description
Description: This emission unit consists of four indirectly-heated drying kiln blocks that dry the rough sawn lumber to reduce the moisture content under carefully controlled temperature and relative humidity conditions. There are multiple kilns within each block. Kiln Block 1 has 12 kilns and Blocks 2, 3, and 4 have 16 kilns each. During kiln drying, condensate from the green rough sawn lumber is collected in basins. At the end of the drying process, the kilns are equalized and condensate is reabsorbed into the dried lumber from the condensate basins.	

EQUIPMENT

1. Drying Kilns: The permittee is authorized to construct up to four kiln blocks to process rough sawn lumber. Lumber kilns will use hot water to heat the green rough sawn lumber and reduce the moisture content. Typical design parameters for the drying kilns include two exhaust vents to the atmosphere with a total of 120 vents from the 60 drying kilns. The total kiln volume is 250 cubic meters (m^3) or 8,830 cubic feet (ft^3). Total production capacity is 700 MMBF/yr. [Application No. 1210468-001-AC]

PERFORMANCE RESTRICTIONS

2. Hours of Operation: The hours of operation of this emission unit are not limited (8,760 hours per year). [Application No. 1210468-001-AC; and Rules 62-212.400 (BACT), 62-4.070(3), and 62-210.200(PTE), F.A.C]

NESHAP APPLICABILITY

3. Subpart DDDD: The drying kilns are subject NESHAP Subpart DDDD in 40 CFR 63 for Plywood and Composite Wood Products. The permittee is required to submit initial notification no later than 120 calendar days after initial startup. [NSHAP Subpart DDDD, 40 CFR 63]

EMISSIONS STANDARDS

4. VOC Emissions: VOC emissions will be minimized by the use of good design and operating practices. Operating practices will include, but not be limited to, a drying temperature of approximately 300°F or less and long dying cycles (e.g., 2.3 to 10 days depending on moisture content and required market specifications). *{Permitting Note: The work practice standards are established as BACT for VOC emissions from drying kilns and are expected to result in a nominal VOC emission rate of 3.5 pound per thousand board feet (lb/MBF.}* [Application No. 1210468-001-AC; Rules 62-212.400 (BACT), 62-4.070(3), and 62-210.200(PTE), F.A.C]
5. PM Emissions: PM emissions shall be controlled by the kiln enclosure and work practice standards such as low velocity exhaust gas released to the atmosphere from the kiln vents. As a work practice standard, visible emissions from the kiln vents shall not exceed 10% opacity excluding water vapor. *{Permitting Note: The work practice standards are established as BACT for $PM/PM_{10}/PM_{2.5}$ emissions from drying kilns and are expected to result in the following nominal emissions: 22 lb PM/MBF, 12.8 lb P_{M10},/MBF, and 4.2 lb $PM_{2.5}$/MBF for an annual production rate of 700MMBF/yr.}* [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400 (BACT), and 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

6. Initial Compliance Tests: One representative kiln vents shall be tested to demonstrate initial compliance with the visible emissions standard specified in **Condition 5** of this subsection. The initial test shall be conducted within 180 days after initial operation. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070(3), F.A.C.]
7. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), one representative kiln vent shall be tested to demonstrate compliance with the visible emissions standard specified in **Condition 5** of this subsection. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070(3), F.A.C.]

DRAFT

8. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix CTR (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

9. Test Methods: Any required stack tests shall be performed in accordance with the following methods.

Method	Description of Method and Comments
EPA 9	Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources (60 Minute Test)

RECORDS AND REPORTS

10. Annual Operating Report (AOR): Emissions for the AOR shall be based on the annual board feet dried and the emissions factors identified for VOC and PM. [Rule 62-210.370(4), F.A.C.]

DRAFT

D. Planer Mill, Sorter and Trimmers (EU-008 and EU-009)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
008	Two Planer Mill Lines with Two Dry Shaving Silos #1 & 2: The planer lines will have vacuum ventilation systems that collect and convey dry wood shavings and sawdust to the dry shavings silos. Dry shavings silos are approximately 56,000 ft^3 each and have a baghouse.
009	Two Sorter Line Trimmers: The sorter line trimmers will send trimmed blocks and ends by gravity feed to a conveyance system and combine with wet sawmill dry shavings and sawdust. Dust and shavings from the sorter line trimmers are sent by vacuum duct to the dry shavings silos

EQUIPMENT

The permittee is authorized to construct the following equipment used during the production of timber products and to control particulate emissions:

1. Planer Mill Lines: The permittee is authorized to construct two planer mill lines for the finishing of the kiln dried rough sawn lumber. These planer mills reduce the dimensions of the finished lumber product to a standard market size. Dry sawdust and shavings from the planer line's are collected by vacuum system and conveyed to the dry shavings silos.
   [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]
2. Two Sorter Line Trimmers: The permittee is authorized to construct two sorter line trimmers. The sorter line trimmers reduce the length of the finished planed dimensional lumber to standard market lengths. Trim blocks and ends are sent by gravity open belt conveyor system to the hogger (grinder mill) then on to the byproduct screening building. Dust and shavings from the sorter line trimmers are sent by vacuum duct to the dry shavings silos. [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]
3. Dry Shaving Silos: The permittee is authorized to construct two dry shaving silos to contain the dry shavings and sawdust from the planer mill lines and the sorter line trimmers. The major components of the dry shaving silos are two 56,000 cubic feet (ft^3) silos and a baghouse on each silo.
   [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]
4. Air Pollution Control Equipment: The permittee shall install baghouse on each of the dry shaving silos for the planer mill extraction system and sorter line trimmers.
   [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

5. Hours of Operation: The hours of operation of the planer mill lines and the sorter line are not restricted (8,760 hours per year).
   [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]
6. VE Standard: Visible emissions from the silo baghouses shall not exceed 5% opacity as demonstrated by initial and annual compliance tests.
   [Application No. 1210468-001-AC; Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]
7. $PM/PM_{10}/PM_{2.5}$ Specification: Baghouse control units shall be designed to achieve a dust outlet loading of 0.004 grains/dscf. Compliance with the design standard shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
   [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]
8. Compliance with Best Management Practices: The permittee shall comply with precautions as listed in Appendix BMP- Best Management Practices. [Rules 62-212.400 (BACT) and 62-4.070(3), F.A.C.]

DRAFT

TESTING REQUIREMENTS

9. Initial Compliance Tests: Each silo shall be tested to demonstrate initial compliance with the VE emissions standard specified in **Condition 6** of this subsection. The initial test shall be conducted within 180 days after initial operation. [Application No. 1210468-001-AC; Rules 62-212.400(BACT), 62-297.310(7), and 62-4.070(3), F.A.C.]

10. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each silo shall be tested to demonstrate compliance with the VE emissions standard specified in **Condition 6** of this subsection. [Application No. 1210468-001-AC; Rules 62-212.400(BACT), 62-297.310(7), and 62-4.070(3), F.A.C.]

11. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix CTR (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

12. Test Methods: Visible emissions shall be determined by EPA Method 9. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

13. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix CTR (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the operating rate.
[Rule 62-297.310(8), F.A.C.]

DRAFT

E. Biomass Boiler Fly Ash Silo (EU-010)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
010	Biomass Boiler Fly Ash Silo: Fly ash collected in the biomass boiler ESP and multi-cyclone is transferred by enclosed conveyors to the flyash storage silo. The silo is unloaded by gravity feed into trucks for disposal offsite. A baghouse is installed on the silo to control particulate emissions from the conveyor feed and truck loading.

EQUIPMENT

1. Biomass Boiler Fly Ash Storage Silo: The permittee is authorized to construct a silo to store flyash from the biomass boiler ESP and multi-cyclones. The silo will be equipped with inlet and outlet ducting that has a baghouse to control dust emissions. [Application No. 1210468-001-AC]

2. Air Pollution Control Equipment: The permittee shall install a baghouse on the fly ash storage silo that has a design control efficiency to reduce outlet emissions to 0.005 grains/dscf.
[Application No. 1210468-001-AC; Rules 62-212.400 (BACT), 62-4.070, and 62-210.200(PTE), F.A.C.]

PERFORMANCE RESTRICTIONS

2. Hours of Operation: The hours of operation of the flyash storage silo are not restricted (8,760 hours per year). [Application No. 1210468-001-AC; Rules 62-210.200(PTE), 62-212.400 (BACT); 62-4.070, and 62-210.200(PTE), F.A.C.]

3. VE Standard: Visible emissions from the silo baghouses shall not exceed 5% opacity as demonstrated by initial and annual compliance tests. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and Rule 62-4.070, F.A.C.]

4. Compliance with Best Management Practices: The permittee shall comply with precautions as listed in Appendix BMP- Best Management Practices.
[Rules 62-212.400 (BACT) and 62-4.070(3), F.A.C.]

EMISSIONS STANDARDS

5. $PM/PM_{10}/PM_{2.5}$ Specification: Baghouse control units shall be designed to achieve a dust outlet loading of 0.005 grains/dscf. Compliance with the design standard shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
[Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

TESTING REQUIREMENTS

6. Initial Compliance Tests: Each silo shall be tested to demonstrate initial compliance with the VE emissions standard specified in **Condition 3** of this subsection. The initial test shall be conducted within 180 days after initial operation. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

7. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each silo shall be tested to demonstrate compliance with the VE emissions standard specified in **Condition 3** of this subsection. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

8. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix CTR (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

9. Test Methods: Visible emissions shall be determined by EPA Method 9. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

DRAFT

RECORDS AND REPORTS

10. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix CTR (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the operating rate. [Rule 62-297.310(8), F.A.C.]

DRAFT

F. Log Storage, Processing, and Sawmill (EU-011)

This section of the permit addresses the following emissions unit.

EU No. 011	Emission Unit Description
Log Storage, Processing, and Sawmill: These emission units comprise the preprocessing of green saw logs into rough cut lumber. Logs are stored, debarked, rough trimmed, sorted and cut into rough sawn dimensional lumber. Wet green byproducts including bark, trimmed roots and ends, chips, and saw dust are stored for combustion on the biomass boilers or for transport and sale offsite. Tree-length green saw logs are either brought directly to the in-feed of the debarking process or stockpiled after being unloaded from truck or rail cars. From stockpiles, logs are fed into the debarking units. Green logs have moisture content of 50% or greater. Debarked logs are conveyed out of the log processing building to be sorted by quality and size into concrete boxes. Sorted logs are then transferred by motored vehicle to intermediate storage stacks prior to being fed into the sawmill. Once the logs are cut into rough sawn lumber in the sawmill, it is sorted according to quality and length and then trimmed to market specifications.	

EQUIPMENT

1. Green Saw Log Debarker Lines: The permittee is authorized to construct two debarking units that separate green saw log from bark and transfer debarked logs to the rough log trimmer. Bark is conveyed by gravity feed to storage for combustion in the biomass boilers or shipped off site for sale. [Application No. 1210468-001-AC]

2. Saw Log Bucking/Root Reducers: The permittee is authorized to install two saw log bucking/root reducing units that remove root, and trim ends. Trimmed and sized (bucked) logs are subsequently feed to the green log sorter. Root chips, log ends, and saw dust are separated by gravity conveyor to be combusted in the biomass boilers or shipped off site for sale. [Application No. 1210468-001-AC]

3. Green Log Sorting Lines: The permittee is authorized to install two green log sorter lines to separate logs by size and quality before transfer to the sawmill. Sorted logs are then transferred by motored vehicle to intermediate storage stacks prior to being fed into the sawmill. [Application No. 1210468-001-AC]

4. Sawmill: The permittee is authorized to install two saw lines to divide logs into rough cut green dimensional lumber. Chips and sawdust are separated by gravity conveyor to a vibrating belt to be combusted in the biomass boilers or shipped off site for sale. [Application No. 1210468-001-AC]

5. Green Lumber Sorting and Trimming Lines: The permittee is authorized to install four green lumber sorting and trimmer lines. Rough cut green dimensional lumber is sorted according to quality and length and then trimmed to market specifications. Green sorted lumber is then stacked and loaded into the kilns to be dried or shipped as rough sawn lumber. Log trimmings are separated by gravity conveyor to the hogger (grinder) unit to be combusted in the biomass boilers or shipped off site for sale. [Application No. 1210468-001-AC]

6. Air Pollution Control Equipment: The permittee shall construct a baghouse to control the emissions of saw dust from the four green lumber sorting and trimming lines. Wet sawdust from the green lumber sorting line's are collected by vacuum system and conveyed through the baghouse to storage to be combusted in the biomass boilers or shipped off site for sale. [Application No. 1210468-001-AC]

7. Miscellaneous Equipment: The permittee is authorized to install, operate, and perform the following equipment and processes at the Suwannee Mill:
   a. Space heaters
   b. Laboratory equipment
   c. Maintenance brazing, soldering, and welding equipment
   d. Fire suppression systems and fire extinguishers
   e. Fungicide, herbicide, and pesticide
   f. Colors, Inks, and Lacquers

DRAFT

[Application No. 1210468-001-AC]

PERFORMANCE RESTRICTIONS

8. Hour of Operation: The hours of operation of the log storage, processing, and sawmill are not restricted (8,760 hours per year). [Application No. 1210468-001-AC and Rules 62-210.200(PTE), 62-212.400 (BACT), 62-4.070, and 62-210.200(PTE), F.A.C.]

9. VE Standard: Visible emissions from the baghouses shall not exceed 5% opacity as demonstrated by initial and annual compliance tests. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and Rule 62-4.070, F.A.C.]

EMISSIONS STANDARDS

10. $PM/PM_{10}/PM_{2.5}$ Specification: The baghouse control unit shall be designed to achieve a dust outlet loading of 0.005 grains/dscf. Compliance with the design standard shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
[Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

TESTING REQUIREMENTS

11. Initial Compliance Test: The baghouse shall be tested to demonstrate initial compliance with the VE emissions standard specified in **Condition 9** of this subsection. The initial test shall be conducted within 180 days after initial operation. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

12. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the baghouse control shall be tested to demonstrate compliance with the VE emissions standard specified in **Condition 9** of this subsection. [Application No. 1210468-001-AC; Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.]

13. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix CTR (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

14. Test Methods: Visible emissions shall be determined by EPA Method 9. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

15. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix CTR (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the operating rate. [Rule 62-297.310(8), F.A.C.]

DRAFT

G. Emergency Generators (EU-012)

This section of the permit addresses the following emissions units.

ID No. 012	Emission Unit Description
This emissions unit consists of five stationary compressions ignition reciprocating internal combustion engines (RICE) that each have a maximum engine rating of 460 brake-horsepower (bhp) at 100% load (approximately 1.2 MMBtu/ hour). The electrical generators have a nominal power rating of 343 kilowatt (kW). The emergency generators provide backup electrical power in the event of a power outage at the Suwannee Mill. The diesel-fueled generators are limited operation during emergencies or operated no more than 100 hours per year for testing, maintenance or other approved purposes per NSPS Subpart IIII in 40 CFR 60. Each engine will meet the federal emission standards specified in NSPS Subpart IIII of 40 CFR Part 60.	

The following table identifies the regulatory applicability characteristics for each engine.

EU No.	Engine Brake HP	Date of Construction	Model Year	Primary Fuel	Type of Engine	Displacement Liters/Cylinder
012	460	2007 & later	2012	Diesel	Emergency	< 10

{Permitting Note: These compression ignition engines are regulated under the federal provisions of NSPS Subpart IIII in 40 CFR Part 60 and NESHAP Subpart ZZZZ in 40 CFR 63 for Stationary Reciprocating Internal Combustion Engines (RICE), which are adopted by reference in Rule 62.204.800(11)(b), F.A.C. This permit subsection addresses "new" stationary compression ignition RICE greater than or equal to 175 HP and less than or equal to 500 HP, with a displacement less than 10 liters per cylinder, that are located at a major source of HAP and that have been modified, reconstructed or commenced construction on or after 6/12/2006 and have a post-2007 model year.}

EQUIPMENT

1. Emergency Generators: The permittee is authorized to install, operate, and maintain five 323 343 kW or less emergency generators. [Application No. 1210468-001-AC and Rule 62-210.200 (PTE), F.A.C.]

PERFORMANCE RESTRICTION

2. Allowable Fuel: The stationary RICE shall fire diesel fuel that meets the following requirements for non-road diesel fuel:

   a. S*ulfur Content.*

      (1) The sulfur content shall not exceed 15 ppm (0.0015% weight) for non-road fuel.

   b. *Cetane and Aromatic*. The fuel must have a minimum cetane index of 40 or must have a maximum aromatic content of 35 volume percent.

   [40 CFR 60.4207(b) and 80.510(b)]

3. Hours of Operation:

   a. *Emergency Situations*. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 60.4211(e)]

   b. *Maintenance and Testing*. Each RICE is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. [40 CFR 60.4211(e)]

   c. *Other Situations*. Each RICE cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4219]

DRAFT

G. Emergency Generators (EU-012)

EMISSIONS STANDARDS

4. Work or Management Practice Standards: The emergency generator shall comply with the following Work or Management Practice Standards in accordance with the procedures given in 40 CFR 63 Table 2d.

   (a) NMHC + NO_X Emissions. Non-methane hydrocarbons and nitrogen oxide emissions shall not exceed 4.0 g/KW-hr. [40 CFR 60.4205(b)]

   (b) CO Emissions. Carbon monoxide emissions shall not exceed 3.5 g/KW-hr. [40 CFR 60.4205(b)]

   (c) PM emissions. Particulate matter emissions shall not exceed 0.2 g/KW-hr. [40 CFR 60.4205(b)]

5. Operation and Maintenance. The owner or operator must operate and maintain the stationary compression ignition RICE according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. The owner or operator must meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [40 CFR 60.4211(a)]

MONITORING OF OPERATIONS

6. Hour Meter. The owner or operator must install a non-resettable hour meter if one is not already installed. [40 CFR 60.4209(a)]

COMPLIANCE

7. Compliance Requirements. Owner or operator must demonstrate compliance by procuring an engine certified according to 40 CFR Part 89 or Part 94, as applicable, for the same model year and maximum engine power.

TESTING REQUIREMENTS

8. Performance Test. Performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F.

9. NTE Standards. Exhaust emissions from stationary compression ignition RICE that are complying with the emission standards specified in **Conditions 4, 5, 6 and 7** of this subsection must not exceed the not to exceed (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard, determined from the following equation: NTE = (1.25) x (Standard). [40 CFR 60.4212]

RECORDKEEPING REQUIREMENTS

10. Required Records. Owner or operator must keep records of the operation of the engine in emergency and non-emergency and for maintenance that are recorded through the non-resettable hour meter. The owner or operator must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214]

11. Record Retention: The owner or operator must keep records in a suitable and readily available form for expeditious reviews. The owner or operator must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6660 and 40 CFR 63.10(b)(1)]

GENERAL PROVISIONS

12. NSPS/NESHAP General Provisions: The owner or operator must comply with the general provisions in NSPS Subpart A of 40 CFR 60 and NESHAP Subpart A in 40 CFR 63. [40 CFR 60.4218]

DRAFT

I. Facility-Wide Miscellaneous Storage Tanks (EU-013)

This section of the permit addresses the following emissions units.

EU No. 013	Emission Unit Description
Miscellaneous Storage Tanks: Tanks are used to store: diesel vehicle fuel, anhydrous ammonia or urea for the SNCR, and mold / blue stain protection for the finished lumber.	

Storage tanks containing diesel vehicle fuel, urea for the SNCR, and mold / blue stain protection are used to produce finished lumber. Diesel fuel is required to operate the mobile equipment that is used to unload logs, transport debarked sorted logs to the sawmill, convey rough cut lumber to and from the drying kilns, transport finished lumber from the planer and sorting lines to storage, and to load finished lumber bundles to transport off site. Diesel fuel is also needed to power the emergency generators. Anhydrous ammonia or urea will be stored in a tank for use in the SNCR system for boiler NOx control.

EQUIPMENT

1. Storage tanks:

   a. The permittee is authorized to construct one 16,000 gallon or less Diesel Storage Tank with a fixed roof to minimize VOC emissions as per 40 CFR 60.110b(a)(2).

   b. The permittee is authorized to construct two 10,000 gallon or less Diesel Storage Tanks, each with a fixed roof to minimize VOC emissions as per 40 CFR 60.110b(a)(2).

   c. The permittee is authorized to construct three 265 gallon or less Diesel Storage Tanks with a fixed roof to minimize VOC emissions as per 40 CFR 60.110b(a)(2).

   d. The permittee is authorized to construct one 10,000 gallon or less urea storage (or anhydrous ammonia) in accordance with 40 CFR 60.130. The storage of urea that is used for NOx control in the SNCR system, shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68.

   e. The permittee is authorized to construct a 26,400 gallon or less mold/stain protection storage tank to preserve the finished lumber.

   [Application No. 1210468-001-AC]

PERFORMANCE RESTRICTIONS

2. Hours of Operation: The hours of operation of this emission unit are not limited (8,760 hours per year). [Application No. 1210468-001-AC), F.A.C.; Rule 62-212.400(BACT), F.A.C.; and Rule 62-4.070, F.A.C. Reasonable Assurance]

3. Compliance with Best Management Practices: The permittee shall comply with precautions as listed in Appendix BMP- Best Management Practices. [Rules 62-212.400 (BACT) and 62-4.070(3), F.A.C.]

NSPS SUBPART Kb EXEMPTION

4. Diesel Storage Tanks: The six diesel storage tanks ranging in capacity from 265 to 16,000 gallons for use to fuel mobile conveying equipment and emergency generators. NSPS Subpart Kb requirements are exempt for vessels with a volume less than 75 cubic meters (m^3) or 19,813 gallons. The volume of the diesel fuel storage tanks are all less than 75 m^3 and exempt from Subpart Kb. [NSPS 40 CFR 60. 110b]

3. Mold/Blue Stain Protection Storage Tank; The mold / blue stain protection has a vapor pressure of 70.0 millimeters of mercury (mmHg) at (68°F) or 9.3 kilopascals (Kpa). NSPS Subpart Kb requirements are exempt for liquids with a vapor pressure less than 15 Kpa and as such, the mold/blue stain protection tank is exempt from Subpart Kb. [NSPS 40 CFR 60. 110b]

DRAFT

RECORDS AND REPORTS

5. Storage Tank Records: The permittee shall keep readily accessible records showing the dimension of the storage tanks and an analysis showing the capacity of the storage tanks. Records shall be retained for the life of the facility. The permittee shall also keep records sufficient to determine the annual throughput of the various liquids for the storage tanks for use in the Annual Operating Report. [Rule 62-4.070(3) F.A.C.

DRAFT