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PERMITTEE

Gilman Building Products, LLC (Gilman)
581705 White Oak Road,
Yulee, Florida 32097

Authorized Representative:
Mr. Victor H. Garrett, President

Permit No. 1230033-012-AC (PSD-FL-427)
Expires: April 8, 2017
Facility ID No. 1230033
Perry Mill
Taylor County

PROJECT

This is the final air construction permit authorizing the replacement the two older indirect-fired lumber drying kilns with a new direct-fired lumber kiln with a capacity of 90 million board feet at Gilman Perry Mill. As a result of this project, the two indirect-fired lumber kilns along with a wood-fired boiler will be permanently shut down at the facility.

The existing Perry Mill is categorized under Standard Industrial Classification (SIC) No. 2421, (Sawmills and Planning Mills, General). The Mill's address is 1509 South Byron Butler Parkway, Perry Florida 32348. The Universal Transverse Mercator (UTM) coordinates of the facility are 250.7 kilometers (km) east and 332.5 km north (UTM Zone 17).

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 a determination of 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

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for: Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

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 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.

Victor H. Garrett, Gilman Building Products, LLC: victorgarrett@gilman.com
Cullen Adair, Gilman Building Products, LLC: cullenadair@gillman.com
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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.

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FACILITY DESCRIPTION AND PROPOSED PROJECT

Gilman Building Products, LLC (Gilman) operates the Perry Mill in the City of Perry in Taylor County Florida. The Perry Mill processes south pine logs into chips, bark and graded finished lumber. The facility currently consists of a 46 million British thermal units per hour (MMBtu/hr) wood-fired boiler that supplies heat to two indirect-fired lumber kilns. One kiln has an annual capacity of 63 million board feet (MBF/yr) while the other has an annual capacity of 33 MBF/yr. In addition, there is one direct-fired lumber kiln with an annual capacity of 60 MBF/yr. There are also several unregulated emission units.

Gilman is proposing to replace the two older indirect-fired lumber kilns with a new direct-fired lumber kiln with a capacity of 90 MBF/yr at its Perry Mill. As a result of this project, the two indirect-fired lumber kilns along with the wood-fired boiler will be permanently shut down.

The emissions units (EU) at the facility, including the new direct-fired lumber kiln are indicated below. The emission units that will be retired as a result of this project are highlighted in yellow. The new emission unit is highlighted in green.

Facility ID No. 1230033	
EU ID No.	**Emission Unit Description**
Regulated Emissions Units	
001	Wood-fired Boiler with two multi-cyclone collectors in a series
004	#3 Direct Fired Lumber Drying Kiln
008	#4 Direct Fired Lumber Drying Kiln
Unregulated Emission Units	
002	Bark and Sawdust Silo with Baghouse
005	#2 Fuel System with Baghouse
006	#1 Indirect Fired Lumber Drying Kiln
007	#2 Indirect Fired Lumber Drying Kiln

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.
- The facility and the proposed project includes units subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR Part 63 (40 CFR 63).

SCOPE OF THIS CONSTRUCTION PERMIT

This PSD air construction permit authorizes the installation of a new direct-fired lumber drying kiln (EU 008) at the Gilman Perry Mill (Facility ID No. 1230033). This permit also requires that once the startup, shakedown and commissioning of the new kiln is completed that the two indirect-fired lumber drying kilns (EU 006 and 007) and the wood-fired boiler (EU 001) at the facility must be permanently shut down. The duration of the shakedown and commission phase for the new kiln shall be done in consultation with the Compliance Authority. Finally, the operation of EUs 002, 004 and 005 at the facility are not affected by the permitting action.

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 Waste and Air Resource Management Section of the Department's Northeast District Office at: 8800 Baymeadows Way West, Suite 100 Jacksonville, FL 32256-7590

3. Appendices: The following Appendices are attached as a part of this permit and must be complied with by the permittee:
   a. Appendix CC: Common Conditions;
   b. Appendix CF: Citation Formats and Glossary of Common Terms;
   c. Appendix CTR: Common Testing Requirements;
   d. Appendix DDDD: NESHAP, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products;
   e. Appendix GC: General Conditions; and
   f. Appendix GP: Identification of General Provisions, Subpart A from NSPS 40 CFR 60 and Subpart A from NESHAP 40 CFR 63.

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) 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 modifications and/or 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, oil, 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.

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. Department Discretion: 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. Department 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 Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b) F.A.C., General Visible Emission Standard]

14. Shutdown of Existing Emission Units: Upon startup, shakedown and commissioning of the new direct-fired lumber drying #4 kiln (EU 008) at the Gilman Perry Mill, the two existing Nos. #1 and #2 indirect-fired lumber drying kilns (EU 006 and 007) and the wood-fired boiler (EU 001) shall be permanently shut down. The exact timing of the shutdown of these emission units shall be done in consultation with the Compliance Authority. The Compliance Authority shall be notified 30 days prior to the startup of the new kiln. A new construction permit shall be obtained, including a PSD applicability analysis, if the applicant wishes authorization to restart any of these shut down emission units. [Application 1230033-012-AC; Rules 62-210.200 (Potential to emit) and 62-212.400 (BACT), F.A.C.]

Direct-Fired Lumber Drying Kiln (EU-008)

This section of the permit addresses the following emissions unit.

EU ID No. 008	Emission Unit Description
Description: This emission unit consists of one batch operate, directly-fired lumber kiln that will dry southern pine lumber to reduce the moisture content under carefully controlled temperature and relative humidity conditions. The drying of the lumber is accomplished by wood-fueled burner in the kiln with a heat capacity of 40 MMBtu/hr. The capacity of the kiln is 90 MBF/yr. The heated air inside the kiln is circulated over the green lumber stacked inside by fans during each drying cycle. Gases from the drying cycle including products of the combustion from the kiln burner and emission from the drying lumber including HAPs and moisture are released through multiple roof vents that open and close during the drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after the kiln has undergone multiple heating and cooling cycles. [Application No. 1230033-012-AC]	

EQUIPMENT

1. Drying Kiln: The permittee is authorized to construct one directly-fired lumber kiln to process southern pine lumber. Miscellaneous equipment will include foundations, electrical work, controllers, fans, baffles, shrouds, ductwork, motor control center, new lumber carts, etc. Typical design parameters for the kiln include 20 roof exhaust vents (22 inch x 22 inch square) actuated pneumatically. The nominal kiln dimensions are 34 feet (ft) in width, 17.5 ft in height and 85 ft in length. [Application No. 1230033-012-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. 1230033-012-AC and Rules 62-212.400 (BACT); 62-4.070, Reasonable Assurance and 62-210.200(PTE), F.A.C]

3. Permitted Capacities: The maximum drying rate for of the kiln shall not exceed 90,000,000 board-feet per 12-month rolling period (90 MBF/yr). [Application No. 1230033-012-AC and Rules 62-212.400 (BACT); 62-4.070, Reasonable Assurance and 62-210.200(PTE), F.A.C]

4. Heat Input Capacity: The maximum heat input rate heat input rate of the burner shall not exceed 40 MMBtu/hr. [Application No. 1230033-012-AC and Rules 62-212.400 (BACT); 62-4.070, Reasonable Assurance and 62-210.200(PTE), F.A.C]

5. Methods of Operation: Waste wood shall be the only fuel fired in this emissions unit.

NESHAP APPLICABILITY

6. Subpart DDDD: This emission unit is subject NESHAP 40 CFR 63, Subpart DDDD – Plywood and Composite Wood Products. However, the kiln is not required to comply with any compliance/operating requirement, and the work practice standards, except for the initial notification as required in 40 CFR 63.9(b). The permittee is required to submit initial notification no later than 120 calendar days after initial startup. [NESHAP 40 CFR 63, Subpart DDDD]

STATE RULE APPLICABILITY

7. Carbonaceous Fuel Burning Equipment: This emission unit is subject to State Rule 62-296.410(2)(b), F.A.C. – Carbonaceous Fuel Burning Equipment. For a piece of equipment whose burners have a capacity of equal to or greater than 30 MMBtu/hr of total heat input, this rule sets emission limits for visible emissions (opacity) of 30 percent (%) and for PM of 0.2 pounds per MMBtu (lb/MMBtu) of heat input of carbonaceous fuel plus 0.1 lb/MMBtu of heat input of fossil fuel. The new direct-fired kiln has a burner capacity of 40 MMBtu/hr. [Rule 62-296.410(2)(b) – Carbonaceous Fuel Burning Equipment, F.A.C,]

EMISSIONS STANDARDS

8. VOC Emissions: The design VOC emission rate from this emissions unit shall not exceed 3.5 pound per thousand board feet. VOC emission control will be achieved through the use of good design and operating practices (see **Specific Condition 9** of this section). [Application No. 1230033-012-AC and Rules 62-212.400 (BACT); 62-4.070, Reasonable Assurance and 62-210.200(PTE), F.A.C]

9. Best Operating Practices for # 4 Kiln (EU 008): At a minimum, the permittee shall operate the kiln in accordance with the following best operating practices (BMP).

   a. Minimize over-drying the lumber;

   b. Maintain consistent moisture content for the processing lumber charge; and

   c. Dry at the minimum temperature.

   The permittee shall develop and operate in accordance with a written plan to implement the above BMP and any others required by the kiln manufacturer. Ninety days before the initial startup of the kiln, the permitted shall submit to the Compliance Authority the BMP plan. The Title V air operation permit shall include the submitted BMP plan.

   {Permitting Note: For this kiln, the Department determined that compliance with the BACT VOC emissions limit shall be demonstrated by the implementation of the BMP plan.}

   [Rules 62-212.400 (BACT); 62-4.070, Reasonable Assurance and 62-210.200(PTE), F.A.C].]

10. PM Emissions: The PM emission rate for this emissions unit shall not exceed 8 pounds per hour (lb/hr) which is equivalent to 0.2 pound per MMBtu (lb/MMBtu) at full load of carbonaceous fuel. Compliance with the PM limit shall be demonstrated by: the kiln enclosure; following and BMP plan (see **Specific Condition 9** of this section); low velocity exhaust gas released to the atmosphere from the kiln vents; and meeting the visible emissions (VE) limit specified in **Specific Condition 11** of this section. [Rule 62-296.410(2)(b), F.A.C, – Carbonaceous Fuel Burning Equipment]

11. Visible Emissions: VE from the kiln vents shall not exceed 30% opacity with one exceedance of 40% opacity for not more than 2 minutes in any one-hour. Compliance shall be demonstrated by initial and annual compliance tests. [Rule 62-296.410(2)(b) – Carbonaceous Fuel Burning Equipment, F.A.C,]

TESTING REQUIREMENTS

12. Initial Compliance Tests: Representative kiln vents shall be tested to demonstrate initial compliance with the VE emissions standard specified in **Specific Condition 11** of this subsection. The initial test shall be conducted within 180 days after initial operation. [Rules 62-296.410(2)(b) and 62-4.070, F.A.C. Reasonable Assurance]

13. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), representative kiln vents shall be tested to demonstrate compliance with the VE emissions standard specified in Specific **Condition 11** of this subsection. [Rules 62-296.410(2)(b); 62-4.070, F.A.C. Reasonable Assurance]

14. 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.]

15. 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)

The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

a. *EPA Method 9, Section 2.4, Recording Observations*. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

b. *EPA Method 9, Section 2.5, Data Reduction*. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 per cent opacity, except that an opacity of 40 per cent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

i. For the basic part of the standard (i.e., 20 percent opacity (the opacity shall be determined as specified above for single-valued opacity standard.

ii. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value. [Rules 62-204.800 and 62-297.401(9)(c) F.A.C.; and Appendix A of 40 CFR 60]

16. DEP Method 9- Required Sampling Time: The required minimum period of observation for each compliance test shall be sixty (60) minutes or, if the operation is normally completed in less than 60 minutes and does not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

RECORDS AND REPORTS

17. Processing Records: Within at least 10 days following each calendar month, the permittee shall record the following information in a written log:

a. The amount of wood dried in the kiln (board-feet) for the previous calendar month; and

b. The amount of wood dried in the kiln (board-feet) for the previous 12 calendar months of operation.

The records shall be maintained in a written (or electronic) log available for inspection by the Compliance Authority. [Rule 62-212.400(BACT), F.A.C.]

18. Annual Operating Reports: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year to summarize operation for the previous calendar year.

{Permitting Note: The permittee should use the best available data for reporting emissions from the kiln. Based on currently available data, the VOC emission factor for the kilns is 3.5 lb VOC/1000 board-feet. This rate is based on the BACT determination.}

[Rule 62-210.370(3), F.A.C.]