TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Georgia-Pacific LLC
Georgia-Pacific Wood & Fiber Procurement
Post Office Box 1458
Palatka, FL 32178

Foley Chip Mill
ARMS Facility ID No. 1230059

PROJECT

Project No. 1230059-003-AC

COUNTY

Taylor, Florida

PERMITTING AUTHORITY

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

COMPLIANCE AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Compliance Assurance
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

July 10, 2014

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters:

Table 1 - Applicable Rules from the F.A.C.

Chapter	Description
62-4	Permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida, also known as the State Implementation Plan (SIP) for Florida.

Glossary of Common Terms

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

Facility Process Description and Location

The Foley Chip Mill is hardwood chip mill (SIC No. 2421). The facility is located at 3979 Stone Container Road, Perry, Florida 32348. This site is adjacent to the existing Buckeye Florida Limited Partnership Foley Mill. The UTM coordinates are zone 17, 256.4 km East; 3330.7 km North. This site is an area that is in attainment (or designated as unclassifiable) for all pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility does not have one or more emissions units subject to NSPS (40CFR 60).
- This facility does not have one or more emissions units subject to NESHAP (40 CFR 61 or Part 63)

Processing Schedule

05/27/14	Department received the Application for Air Permit – Non-Title V Source
06/06/14	Draft permit issued
07/08/14	Received comments from applicant
07/11/14	Revised Draft permit issued

Glossary of Common Terms

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

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

Based on Permit No. 1230059-002-AC and the applicant's submitted information for the existing facility as shown in the table below, the highest potential emissions from the proposed temporary portable generator is estimated at 2.10 TPY NOx . This project is classified as a minor modification to a minor stationary source. The modification by itself is not considered a major increase therefore; the project is not subject to PSD preconstruction review.

The table summarizes the potential maximum emissions from the proposed temporary use engine combined with the previously calculated potential emissions from the Chip Mill. :

FOLEY CHIP MILL POTENTIAL FACILITY-WIDE EMISSIONS SUMMARY

	PM (tons)	PM_{10} (tons)	$PM_{2.5}$ (tons)	NO_x (tons)	CO (tons)	SO_2 (tons)	VOC (tons)
Chip Mill[1,2]	19.0	10.0	3.0				
Portable[3] Generator	0.14	0.14	0.15	2.10	0.47	0.14	1.46
Total	19.14	10.14	3.15	2.10	0.47	0.14	1.46

[1] Detailed emission calculations are available in Application No. 1230059-002-AC.

[2] Emissions based on 8,760 hours of operation

[3.] Annual emissions from the engine are based on the proposed estimated 504 hours per year maximum operating rate.

Project Description

The Foley Chip Mill consists of a log yard, sawing, debarking operations, chipping operations, and chip and bark handling.

The Foley Chip Mill will receive whole, hardwood logs and will process them into wood chips and hogged bark. Logging trucks will deliver whole logs to the facility where they will be placed into storage using a clamshell crane. When ready to be processed, the whole logs will be loaded onto the log conveyor where they will be cut to the appropriate length by a sizing saw. The sized logs will be conveyed to the debarker where the bark will be removed from the logs. The debarked logs will be conveyed on the chipper infeed conveyor to the chipping saw, where the logs will be reduced into wood chips suitable for use in a pulp mill. The chip outfeed conveyor will load the chips onto railcars, or when the rail operation is shutdown, onto transport trucks, for offsite distribution. Bark from the debarker will be conveyed to the hogger and then conveyed to a truck loadout station for shipment by truck.

All energy consuming equipment at the facility are operated exclusively by electrical power. Upon completion of this project the facility will be allowed the use of a portable gasoline/diesel fuel powered 200 KW generator only during periods when electrical power supplied to the mill is temporarily interrupted.

Based on the submitted application, the facility anticipates an hourly gasoline/diesel fuel usage rate for the temporary portable generator of a maximum of 6.0 gallons per hour with an annual usage rate of 3,020 gallons based on 504 hours of operation which is below the 64,000 gallons threshold in the categorical conditional exemption of Rule 62-210.300(3)(a)35., F.A.C.

The engine meets the categorical exemption rule 62-210.300(3)(a)35., F.A.C. therefore it is exempted from any requirement to obtain an air construction permit and Non-title V operation permit. This Air Construction Permit

modification is required to in order to revise to the language in Specific Condition 4 of Permit No. 1230059-002-AC.

The use of the temporary portable generator may result in an increase of emissions from the burning of fuel The fuel usage in the engine, is to be included in the recordkeeping requirements of the facility.

The proposed project is not intended to increase the maximum annual throughput rate and the maximum annual production rates previously permitted at the facility The maximum annual raw log throughput rate will be 1,314,000 tons per year (TPY), based on the debarker design of 150 tons per hour (TPH) and operation for 8,760 hours per year. The maximum annual bark production rate will be 183,960 TPY, based on 14 percent of a log being bark. The maximum annual chip production will be 1,130,040 TPY, based on the chipper design of 129 TPH, the annual log consumption of 1,314,000 TPY, and based on 86 percent of a log being wood. The bark hogger has a design capacity of 21 TPH. The facility is expected to operate continuously, 8,760 hrs/yr (Permit No. 1230059-002-AC)

Proposed Work

Modifies construction Permit No. 1230059-002-AC to allow the use of a portable gasoline/diesel fuel powered generator to provide power to the facility weigh stations during periods when electrical power (which is the only source of power to the mill), is temporarily interrupted.

Construction permit No. 1230059-002-AC which was issued January 30, 2014 authorized the restart of the hardwood chip mill owned by Buckeye Florida, LP. Georgia-Pacific, LLC acquired Buckeye Florida, LP when it acquired all of Buckeye Technologies, Inc. in an August 23, 2013 merger.

The following Specific Condition is revised as follows:

Specific Condition No. 4 of Permit No. 1230059-002-AC

From:

4. Methods of Operation- Authorized Fuel. No fuels are authorized for the equipment used in the Foley Chip Mill operations. There shall be no fuel combustion units at the facility and all energy consuming equipment shall be electric.

   [Application No. 1230059-002-AC; Rules 62-4.070, 62-210.200(PTE), F.A.C.]

To:

4. Methods of Operation- Authorized Fuel. No fuels are authorized for the equipment used in the Foley Chip Mill operations except during periods when electrical power to the facility has been temporarily interrupted. During normal operation, there shall be no fuel combustion units operating at the facility and all energy consuming equipment shall be electric. During periods when electrical power to the facility has been temporarily interrupted, a portable rental generator of up to 200 kW may be brought on site for temporary operation.

   [Application No. 1230059-002-AC; Rules 62-4.070, 62-210.200(PTE), F.A.C., Applicant Request May 27, 2014]

3. FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) REVIEW

Rule Applicability

Title V Applicability Review

Based on the information submitted, project potential emissions the Foley Chip Mill are less than 100 tons per year, and 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants; therefore, the facility is not classified as a Title V Source. Because the facility is not classified as one of the 28 named source categories, fugitive emissions are not counted towards the 100 ton per year Title V applicability threshold.

NSPS Applicability

The temporary 200 kW portable generator is classified as a mobile non-road compression ignition (CI) reciprocating internal combustion engine (RICE) pursuant to the definition in 40 CFR 1068.30 and therefore is not subject to the requirements of 40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Hazardous Air Pollutants

Based on the information submitted, project potential emissions the Foley Chip Mill, potential HAP emissions are less than major source thresholds of 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants. As such, the facility is classified as an area source of HAP emissions and the major source NESHAPs and the Clean Air Act Section 112(g) [Case-by-Case MACT Determination] do not apply to this project.

NESHAP Applicability

Based on the submitted application the facility does not operate any units or activities that are subject to 40 CFR 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Applicability of Previous Air Permits

The conditions of this permit supplements all other previously issued air permits for this facility. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The owner or operator shall continue to comply with the conditions of those permits, which include restrictions and standards regarding, operations, recordkeeping, reporting, operation of air pollution control devices, and the like. The Permittee shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-296, and 62-297, F.A.C.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Yasmin K. Enriquez is the project processor responsible for reviewing the application and drafting the permit.

Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.