

Florida Department of Environmental Protection, Southwest District
Division of Air Resource Management
FULL COMPLIANCE EVALUATION (FCE) CHECKLIST

ARMS ID 1050244	OWNER/COMPANY Sunbelt Forest Products Corporation	SITE NAME Sunbelt Forest Products Corporation
<input type="checkbox"/> TITLE V	<input checked="" type="checkbox"/> SYNTHETIC MINOR (Emissions limited to $\geq 80\%$ and $< 100\%$ of major source thresholds)	DATE OF THIS FCE: 05/23/2012 <input checked="" type="checkbox"/> ON-SITE ASSESSMENT: INS2 Inspection conducted 05/15/2012. <input type="checkbox"/> OFF-SITE ASSESSMENT (Explain reason for Off-Site in 'Comments')
<input type="checkbox"/> TITLE V MEGA-SITE*	<input type="checkbox"/> OTHER:	DATE OF PREVIOUS FCE: N/A

*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

REVIEW OF ALL REQUIRED REPORTS

PERIODIC REPORTS	COMMENTS
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Annual Operating	2011 AOR submitted by facility on 03/19/2012, awaiting review by FDEP; 2005 through 2010 AORs submitted by facility and reviewed by FDEP.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Annual Statement of Compliance – Title V	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Title V Semi-Annual Monitoring	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Semi-Annual Compliance	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly Compliance	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Stack Test	N/A
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Visible Emissions (VE) Test	Federal Fiscal Year (FFY) 2012 test conducted on 05/15/2012 (audited by Amaury Betancourt, FDEP). Tests are on file for the following Federal Fiscal Years: 1995, 1997-1999, 2001-2006, 2008-2011. No information was found in physical file nor in the ARMS database for VE tests for 1996, 2000, and 2007. Two VE tests were conducted for FFY 2009: one on 12/03/2008 and one on 05/19/2009. The test for FFY 2008 was conducted on 02/15/2008, and the test for FFY 2006 was conducted on 04/25/2006. There were approximately 22 months (less than two years) between VE tests for FFY 2006 and FFY 2008. Thus, it is reasonable to count the FFY 2008 test for FFY 2007, and the first test for FFY 2009 (conducted on 12/03/2008) can be counted for FFY 2008, with the test conducted on 05/19/2009 counting for FFY 2009.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other:	N/A

CONTINUOUS EMISSION MONITOR REPORTS	COMMENTS
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly excess emissions	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Semi-annual	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A RATA	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A CGA	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	N/A

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OBSERVATIONS AND RECORDS REVIEW

OBSERVATIONS AND RECORDS		COMMENTS
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Visible emission observation(s)	VE Testing for FFY 2012 for this facility was conducted by Dale T. McDonough of S.E. McDonough and Associates, Inc. (engineering consultant for Sunbelt Forest Products Corporation); official test report not yet received by the Department as of 05/24/2012; no visible emissions observed during audit by Amaury Betancourt.
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Review of facility records and logs	Wood throughput records reviewed from 11/26/2007 through 05/11/2012; Maintenance, including facility sweeping, records reviewed from 09/28/2007 through 05/11/2012; Electrical maintenance, including cleaning dust around electrical panels due to combustible dust policy, records reviewed from 03/26/2009 through 04/20/2012 (electrical maintenance records not specifically required by current air operating permit); Operating hours records reviewed from 12/06/2007 through 05/14/2012.
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Assessment of process parameters (feed rates, process rates, raw material compositions, etc.)	Based on records review, facility has maintained average daily wood throughput rate below 30,000 lbs/year and has maintained facility operating hours below 4,650 hours per any consecutive 12 month period.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Assessment of control equipment performance parameters (water flow rates, pressure drops, temperatures, ESP power levels, etc.)	Cyclone controls particulate matter emissions from woodworking operations. According to the manufacturer, U.S. Metal Works (USMW), based on a letter from February 4, 1994 (prior to the construction of the cyclone) from the manufacturer to Air Observations, Inc. (consultant, at the time, to Sunbelt Forest Products Corporation), USMW stated that the cyclone at Sunbelt Forest Products will be 99% efficient based on material weight with a 10 micron or larger particle size, and will be 99% efficient by volume weight.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Stack test observation(s)	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Other :	N/A
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Other :	N/A

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INSPECTION REPORTS
(COMPLIANCE MONITORING REPORTS)

DATE OF INSPECTION	DATE OF INSPECTION REPORT	FULL/PARTIAL (F OR P)	INVESTIGATIVE (YES OR NO)	LOCATION OF INSPECTION REPORT REQUIRED ELEMENTS:					
				FACILITY INFO	APPLICABLE REQUIREMENTS	LIST OF EUs	ENFORCEMENT HISTORY	COMPLIANCE ACTIVITIES	FINDINGS & RECOMMENDATIONS
05/15/2012	05/24/2012	Full	No	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES
				<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files
INSPECTOR: Amaury Betancourt									
05/19/2010	05/27/2010	Full	No	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES
				<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files
INSPECTOR: Malik Pickering									
10/30/2007	11/01/2007	Full	No	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES
				<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files	<input checked="" type="checkbox"/> Paper Files
INSPECTOR: Michael Celestin									

In-house tools with electronic report generation features: ARMS (Air Resource Management System) database; and EASIIR (Electronic Access System for Inspection Information Retrieval)

Internet-accessible information: ACES (Air Compliance and Enforcement Search); and APDS (Air Permit Documents Search)

COMMENTS

I, Amaury Betancourt, conducted an air quality compliance inspection and a visible emissions test audit for this facility on 05/15/2012 as part of the first full compliance evaluation (FCE) for this facility. For detailed information from this inspection, please see the inspection report from 05/15/2012 and the digital photograph log attached to the inspection report from 05/15/2012. On 05/23/2012, I contacted the facility owner/authorized representative, Mr. Ken Delle Donne, General Manager for Sunbelt Forest Products Corporation, to determine what sawing equipment is currently on site. He stated during the inspection on 05/15/2012 that the facility had, in the past, installed a second gang rip saw, but had then removed it. During my inspection of this facility on 05/15/2012, I noticed this non-operational gang rip saw in the facility's maintenance building. Mr. Ken Delle Donne stated that the list of sawing equipment listed on the facility's current air operating permit, Air Operating Permit No. 1050244-003-AO, is currently correct: one gang rip saw, one band saw, three trim saws (also called chop saws), one dado saw, and one moulder. During the VE test audit on 05/15/2012, the equipment running was the gang saw (listed as Gang Saw I), the moulder, the band saw, Chop Saw I, and Chop Saw II.

During the telephone conversation between Mr. Donne and me on 05/23/2012, I told Mr. Donne that this facility's current air operating permit lists the only emission unit (EU) at the facility as EU001, Woodworking Facility, and this provides some flexibility for actual equipment operating at the facility, as long as the wood throughput rate does not exceed 30,000 lbs/hour on a daily average. I did suggest to Mr. Donne that the facility should notify the Department before installing any sawing equipment or equipment that may have the potential to emit air pollutants. I followed up our telephone conversation with an e-mail on

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05/23/2012 to remind Mr. Donne of our conversation and to specifically state that Administrative Requirement 6 of this facility's current air operating permit states that this facility must obtain prior approval from the Department before making any modifications at the facility. Modification is defined in Administrative Condition 6 in this facility's current air operating permit as any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emissions unit or facility. Administrative Condition 6 of this facility's current air operating permit also references the Florida Administrative Code (F.A.C.), chapter 62-210.200, F.A.C. for the definition of modification.#####

Prepared by: Amaury Betancourt

Date: 05/24/2012

Reviewed by: Danielle D. Henry

Date: 6/14/2012