Department of
Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen M. Castille
Secretary

PERMITTEE:

Suwannee Lumber Company
Post Office Box 5090
Cross City, Florida 32628

I.D. Number:	0290004
Permit/Cert Number:	0290004-007-AC
Date of Issue:	November 1, 2004
Expiration Date:	May 1, 2005
County:	Dixie
Latitude/Longitude:	29º 37' 55" N; 83º 08' 38" W
UTM:	(17) E-291.8; N-3280.7
Project:	Construction of a direct-fired lumber drying kiln and a sawdust silo

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

PROJECT

For the construction of a direct-fired lumber drying kiln and a sawdust silo. The dimensions of the new kiln are 33-feet x 84-feet, and it has a total heat input rate of 39.4 MMBtu per hour. The sawdust silo is used to store and convey sawdust to the kiln for use as the fuel.

FACILITY DESCRIPTION

This facility currently consists of Emissions Unit 002: No. 1 Direct-Fired Lumber Drying Kiln and Emissions Unit 003: No. 2 Direct-Fired Lumber Drying Kiln. Sawdust from the silos is used as fuel in the direct-fired kilns.

In a direct-fired kiln, combustion is accomplished in two stages:
(1) Drying and gasification, and (2) combustions of gaseous products.

Lumber drying is accomplished by passing the heated air through the lumber. Emissions from the kiln are released through the vents during the drying process.

Based on the information provided in the application, the facility is classified as PSD major source upon installation of the third kiln. For informational purposes, potential emissions are listed below:

Pollutant	Tons Per 12 Month Period
PM/PM10	26.0
VOCs	263.0 *[1]
NOx	7.1
CO	33.9
H095	7.6
H115	11.8 *[2]

Facility Description Continue:

*[1] Exceeds the PSD Major Source threshold of 250 tons per year.
*[2] Exceeds the Major Source threshold for an individual HAP of 10 tons per year.

REGULATORY CLASSIFICATION

The following emissions unit is subject to regulation under: Rule 62-296.410, F.A.C. for Carbonaceous Fuel Burning Equipment.

Emissions Unit 004: No. 3 Direct Fired Kiln

OPERATING LOCATION

Located at Southwest of US 19 on Highway 351-A, West of Cross City, Cross City, Dixie County, Florida.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit- Long Form received May 3, 2004

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under the conditions of the permit;

   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

   a. a description of and cause of non-compliance; and

   b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

   ( ) Determination of Best Available Control Technology (BACT)
   ( ) Determination of Prevention of Significant Deterioration (PSD)
   ( ) Compliance with New Source Performance Standards (NSPS)

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

    - the date, exact place, and time of sampling or measurements;
    - the person responsible for performing the sampling or measurements;
    - the dates analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. **Hours of Operation**: The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 Hours per year.
   [Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

2. **Permitted Capacity**: The maximum heat input rate is limited to 39.4 mmBtu/hour.
   {*Note: Based on sawdust heat value approximately 4500 Btu/lb, maximum 38,325 tons of sawdust burned per year.*}
   [Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

3. **Method of Operation- Fuels**: The kiln is carbonaceous (wood waste) fired.
   [Rule 62-213.410, F.A.C.]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

4. **Emission Limits**: The permitted maximum allowable emission rate for each pollutant is as follows.

Pollutant	Emissions Limit	Rule
VE	≤ 30%, except for ≤ 40% for not more than 2 minutes in any one hour	62-296.410 (2)(b) 1., F.A.C.
PM	0.2 lbs/MMBtu of carbonaceous fuel plus 0.1 lbs/MMBtu of fossil fuel *	62-296.410 (2)(b) 2., F.A.C.

* **Equivalent** to 7.88 lbs/hour of PM (when only carbonaceous fuel burned), based on 4.375 tons of sawdust burned per hour.

5. **General Visible Emissions Standard (Facility Wide)**: No person shall cause, let, permit, suffer or allow to be discharge 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 Ringelmann Chart (20% opacity).
   [Rule 62-296.320(4)(b)1., F.A.C.]

6. **Unconfined Particulate Matter (Facility Wide)**: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of material; construction, alteration, demolition or wrecking; or industrially activity such as loading, unloading, storing and handling; without taking reasonable precaution to prevent such emissions. Reasonable precautions may include but are not limited to the followings:
   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 paved roads and/or other paved areas under the control of the owner or operator of the facility to prevent reentrainment, 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 prevent particulate matter.
   g. Confining abrasive blasting where possible.
   h. Enclosure or covering of conveyor systems.
   [Rule 62-296.320(4)(c), F.A.C.]

7. **Objectionable Odor Prohibited**: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.310(2), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

8. **Compliance Testing**: Test the emissions for the following pollutant(s) prior to obtaining the air operation permit. [Rule 62-297.310(7)(a), F.A.C.]

Pollutant	Test Method	Applicable Rule
VE	DEP Method 9	Rule 62-296.410(3)(a), F.A.C.
PM	DEP Method 5	Rule 62-296.410 (3)(b), F.A.C.

9. **Operation During Compliance Test**: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined in Specific Condition 3. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2)(b), F.A.C.]

10. **Special Compliance Tests**: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(3)(b), F.A.C.]

11. **Compliance Test Notification**: At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of this Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a) 9., F.A.C.]

12. **Accuracy of Equipment**. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5)(b), F.A.C.]

13. **Compliance Test Procedures**: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

SPECIFIC CONDITIONS:

REPORTING AND RECORDKEEPING REQUIREMENTS

14. **Recordkeeping**: The owner or operator shall maintain records for:
    (a) The amount of sawdust burned in tons per month for each 12-consecutive month. These records shall be retained for five years.
    (b) The throughput rate in Mbf of lumber dried per month for each 12-consecutive month. These records shall be retained for five years.

15. **Compliance Test Reports:** Reports of the required compliance tests shall be submitted to the Department, as soon as practical but no later than 45 days after the last test is completed. Each test report shall include the permitted capacity at which this source was operated since the most recent test.
    [Rule 62-297.310(8)(b), F.A.C.]

ADMINISTRATIVE

16. The I.D. No. and Project name for this source shall be used on all correspondence.

17. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

18. This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rule. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V Operation Permit Revision by submitting a complete **Application for Air Permit – Long Form** [DEP Form No. 62-210.900(1), F.A.C.], to the department at least ninety (90) days prior to the expiration date of this construction permit, but no later than one hundred and eighty (180) days after commencing operation. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance reports as required by this permit.
    [Rule 62-4.030, 62-4.050, 62-4.220 and 62-213, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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