



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Suwannee Lumber Company
40 SW 10th Street
Cross City, Florida 32628

Air Permit No. 0290004-012-AC
Permit Expires: November 19, 2013

Authorized Representative:
Daniel Dickert, President

Cross City Mill
Minor Source Air Construction Permit
EU004 Kiln No. 3 Extension

This is the final air construction permit, which authorizes the extension of Kiln No. 3 in order allow continuous feed from both sides of the kiln and to change the capacity of all three kilns. The proposed work will be conducted at the Cross City Plant, which is a Kiln drying lumber (Standard Industrial Classification No. 2421). The facility is located in Dixie County at 40 SW 10th Street, Cross City, Florida. The UTM coordinates are Zone 17, 291.8 km East, and 3280.7 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

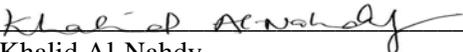
Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

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 is not subject to 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.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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 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.

AIR CONSTRUCTION PERMIT (DRAFT)

Executed in Jacksonville, Florida


Khalid Al-Nahdy
Air Program Administrator

November 19, 2012
(Date)

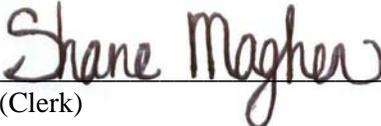
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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 November 19, 2012 to the persons listed below.

Daniel Dickert, President- Suwannee Lumber Company (ddic415538@aol.com)
Frank Darabi, P.E. of Record, Darabi Associates, Inc. (fdarabi@darabiassociates.com)
Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

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.


(Clerk)

November 19, 2012
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Suwannee Lumber Company operates a lumber wood processing facility (SIC code 2421) and also treats poles and plywood obtained from an outside source, with preservatives.

Proposed Project

Extension of Kiln No. 3 in order allow continuous feed from both sides of the kiln and to change the capacity of all three kilns This project will modify the following emissions unit(s).

| | |
|--------------------------------|----------------------------------|
| Facility ID No. 0290004 | |
| ID No. | Emission Unit Description |
| 002 | No. 1 Direct-Fired Kiln |
| 003 | No. 2 Direct-Fired Kiln |
| 004 | No. 3 Direct-Fired Kiln |

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

Potential Emissions: The emissions factors and the estimated potential emissions are as below.

| Pollutant(s) | Emissions Factor (lb/Mbf) | Emissions Factors Reference | EU002 Emissions Rate (tpy) | EU003 Emissions Rate (tpy) | EU 004 Emissions Rate (tpy) | Facility Wide Emissions Rate (ton/yr) |
|---------------------|----------------------------------|------------------------------------|-----------------------------------|-----------------------------------|------------------------------------|--|
| PM/PM10 | 0.375 | GP Cross City Data | 5.63 | 7.5 | 15.0 | 28.1 |
| NOx | 0.102 | GP Cross City Data | 1.53 | 2.04 | 4.08 | 7.7 |
| CO | 0.491 | GP Cross City Data | 7.37 | 9.82 | 19.6 | 36.8 |
| VOC | 3.80 | NCASI Tech Bulletin 845 | 57.0 | 76.0 | 152 | 285 |
| H095 | 0.11 | NCASI Tech Bulletin 845 | 1.55 | 2.06 | 4.12 | 7.71 |
| H115 | 0.17 | NCASI Tech Bulletin 845 | 2.40 | 3.20 | 6.40 | 12.0 |

Control: The emissions from the kiln are uncontrolled.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority & Compliance: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 7777 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256, (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D (Common Testing Requirements).
3. 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.
4. 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.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be 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.]
6. Source Obligation:
 - (a) 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 subsections 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.
 - (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 exceeding its projected actual emissions, then the requirements of subsections 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

7. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after 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.]
8. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of **10 years following resumption of regular operations after the change**. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during **the 10-year period** setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual VOC, PM, NO_x, CO, HO₉₅, and H115 emissions for the following units: Emissions Units 002, 003 & 004.

[Application 0290004-012-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. SPECIFIC CONDITIONS

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|--------|--|
| 002 | No. 1 Direct Fired Lumber Dry Kiln. Steam from the kiln is used for drying lumber at the facility. |
| 003 | No. 2 Direct-Fired Kiln. |
| 004 | No. 3 Direct-Fired Kiln. |

These emissions units are subject to the requirements of Rule 62-296.410(2)(a), F.A.C.- Carbonaceous Fuel Burning Equipment. The unit is an affected source of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. However, the kiln 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). }

EQUIPMENT

1. **Relation to Other Permits.** The conditions of this permit will supplement and comply with conditions of all existing, valid, Department permits.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

2. **Equipment Change.** No. 3 Direct-Fired Kiln: The permittee is authorized to extend No. 3 Direct-Fired Kiln.

[Application No. 0290004-012-AC]

PERFORMANCE RESTRICTIONS

3. **This project will change the Permitted Capacity- Throughput Rates as follows:**

a. **EU002 No.1 Direct-Fired Kiln Permitted Capacity- Throughput Rate.** The maximum process rate shall not exceed 84 Mbf (84,000 board feet), during any single drying cycle or charge. The maximum annual process rate shall not exceed 30,000 Mbf during any twelve consecutive months. This capacity shall include any logs or plywood that may be dried for the wood preserving operation.

b. **EU003 No.2 Direct-Fired Kiln Permitted Capacity- Throughput Rate.** The maximum process rate shall not exceed 112 Mbf (112,000 board feet), during any single drying cycle or charge. The maximum annual process rate shall not exceed 40,000 Mbf during any twelve consecutive months. This capacity shall include any logs or plywood that may be dried for the wood preserving operation.

c. **EU004 No.3 Direct-Fired Kiln Permitted Capacity- Throughput Rate.** The maximum process rate shall not exceed 219 Mbf (219,000 board feet), during any single drying cycle or charge. The maximum annual process rate shall not exceed shall not exceed 80,000 Mbf during any twelve consecutive months. This capacity shall include any logs or plywood that may be dried for the wood preserving operation.

d. **Maximum Combined Permitted Capacity- Throughput Rate (EU002, EU003 and EU004).** The total maximum process rate for the combined three kilns shall not exceed 150,000 Mbf per year.

[Application No. 0290004-012-AC; Rule 62-210.200(PTE), F.A.C.]

SECTION 3. SPECIFIC CONDITIONS

4. **Permitted Fuel Capacity Rates as follows:**

a. **EU002 Permitted Capacity – Burner Heat Input.** The maximum heat input rate of the burner shall not exceed 20.0 MMBtu/hr (Basis: 4500 lb/hr, 4500 Btu/lb).

b. **EU003 Permitted Capacity – Burner Heat Input.** The maximum heat input rate of the burner shall not exceed 25.0 MMBtu/hr (Basis: 6260 lb/hr, 4500 Btu/lb).

c. **EU004 Permitted Capacity – Burner Heat Input.** The maximum heat input rate of the burner shall not exceed 29.5 MMBtu/hr (Basis: 7633 lb/hr, 3825 Btu/lb).

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.; and Application No. 0290004-012-AC]

5. **Hours of Operation.** The hours of operation of are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

6. **Methods of Operation- Fuel(s).** Sawdust shall be the primary fuel fired in the Kilns. Propane gas shall be fired as a pilot fuel only.

[Air Operation Permit 0290004-004-AF; Rule 62-4.070, F.A.C.]

EMISSIONS STANDARDS

7. **EU002, 003 & 004 Visible Emissions.** This permit does not change any or establish any new permitting emissions limits for these EUs: Visible emissions shall not exceed 20 percent opacity except that 40 percent opacity is permissible for not more than 2 minutes in any one hour.

[Rule 62.296.410(2)(a), F.A.C.; Permit No. 0290004-004-AF]

TESTING REQUIREMENTS

8. **EU004 Initial Compliance Test.** Emissions unit 004 shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. The initial tests shall be conducted prior to applying for an operating permit.

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

9. **Annual Compliance Tests.** During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions.

[Rule 62-297.310(7)(a)4, F.A.C.]

10. **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 D (Common Testing Requirements) of this permit.

[Rule 62-297.310(7)(a)9, F.A.C.]

SECTION 3. SPECIFIC CONDITIONS

11. Test Methods. This permit does not change any or establish any new permitting test methods for this EU: The Visible Emissions test method shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations (specified in Subsection D). The above method is described in Appendix A of 40 CFR 60 and are 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 Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

12. DEP Method 9. This permit does not change any or establish any new permitting test methods for this EU: The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. 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.
2. 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:
 - a. 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.
 - b. 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.

[Rule 62-297.401(9)(c) F.A.C.]

SECTION 3. SPECIFIC CONDITIONS

- 13. DEP Method 9- Required Sampling Time.** This permit does not change any or establish any new permitting sampling times for this EU: 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.

[Rules 62-297.310(4)(a)2 and (4)(a)2.a., F.A.C.]

RECORDS AND REPORTS

- 14.** This permit does not change any or establish any new Record Keeping and Reporting for these EUs.
- 15.** This Facility is subject to SECTION 2. Administrative Requirements of this permit and also, the attached Appendices.