



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

PERMITTEE

Cross City Lumber, LLC
59 NE 132 Ave
Cross City, Florida 32628

Air Permit No. 0290018-001-AC
Permit Expires: October 1, 2018
Minor Air Construction Permit

Authorized Representative:
Steven W. Conner, Managing Partner

Cross City Lumber, LLC
Cross City Lumber

PROJECT

This is the final air construction permit, which authorizes the construction of a new lumber mill with two 26 MMBtu/hour direct-fired kilns and one 29.5 MMBtu/hour direct-fired kiln. The proposed work will be conducted at the new Cross City Lumber, which is a lumber mill categorized under Standard Industrial Classification No. 2421. The new facility will be located in Dixie County at NE 132 Ave in Cross City, Florida. The UTM coordinates are Zone 17, 300.3 km East and 3278.0 km North.

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 A of Section 4 of this permit.

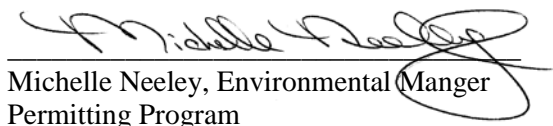
STATEMENT OF BASIS

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 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.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


Michelle Neeley, Environmental Manager
Permitting Program

DRAFT PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package and all copies were sent on the filing date below to the following listed persons.

Steven Conner, Cross City Lumber, LLC, Steve@dupontyard.com

Frank Darabi, P.E., Darabi and Associates, Inc., fdarabi@darabiassociates.com

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

September 18, 2017

Date

SECTION 1. GENERAL INFORMATION (DRAFT)

PROPOSED PROJECT

The proposed project is the re-permitting of the former GP Chip N Saw facility (0290003) which was shut down in November 2007. The GP Chip N saw Title V permit was surrendered on April 24, 2015 after it was confirmed the facility was closed for business and no longer required a Title V Air Operation Permit.

The new facility will consist of a sawmill, planer mill and three direct-fired kilns. Sawdust collected in the fuel storage silos A and B will be used as fuel in the direct-fired kilns. The lumber drying process is a long duration batch process. Lumber drying is accomplished by passing the heated air through the lumber. In the carbonaceous fuel burner, combustion is accomplished in two stages:

(1) Drying and gasification, and (2) combustion of gaseous products.

Gases from the kiln are exhausted through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through kiln doors and other exit points created after a kiln has undergone multiple heating and cooling cycles.

Kiln Nos. 1 and 2 (EU Nos. 001 and 002)

The kilns are manufactured by Irvington Moore/Energy Sys. Each kiln has the capacity to load up to 123 thousand board feet (Mbf)/charge. The maximum heat input rate for each burner is estimated to be 26 MMBtu/hr. The emissions from each kiln are uncontrolled.

Kiln No. 3 (EU No. 003)

This kiln is manufactured by Irvington Moore/Energy Sys. The kiln has the capacity to load up to 155 thousand board feet (Mbf)/charge. The maximum heat input rate for the burner is estimated to be 29.5 MMBtu/hr. The emissions from the kiln are uncontrolled.

The maximum yearly throughput rate for all three kilns combined is limited to 100,000 Mbf/year.

This project will add the following emissions units.

Facility ID No. 0290018	
ID No.	Emission Unit Description
001	Direct-fired Kiln No. 1
002	Direct-fired Kiln No. 2
003	Direct-fired Kiln No. 3

Emissions Units/Activities exempt from the requirement to obtain an air construction permit:

ID No.	Emissions unit/Activity	Rule
004	Miscellaneous diesel, gasoline and hydraulic oil tanks	62-210.300(3)(b)
005	Log storage area	62-210.300(3)(b)
006	Green and finished lumber storage	62-210.300(3)(b)
007	Planer, Chip-N-Saw, Edgers #1 and #2, Planer Trim Saw, Sawmill Trimmer and Two Vertical Saw Arbors all located indoors	62-210.300(3)(b)
008	Ash recycle pile	62-210.300(3)(b)
009	Green sorter and stackers	62-210.300(3)(b)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY REGULATORY CLASSIFICATION

- The facility is 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 (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility **has no** units subject to Standards of Performance for New Stationary Sources
- The facility **has** units subject to National Emission Standards for Hazardous Air Pollutants for Source Categories

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northeast District Office of the Department of Environmental Protection (Department). The Northeast District Office mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements), Appendix NESHAP Subpart A and Appendix NESHAP Subpart DDDD.
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: 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.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
8. 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 (DRAFT)

9. 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 and Chapter 62-213, F.A.C.]
10. Unconfined 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
- a. Paving roadways.
 - b. Landscaping or planting of vegetation.
 - c. Use of enclosures and windbreaks, where practical.

[Rule 62-296.320(4)(c), F.A.C. and Application 0290018-001-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 001, 002 and 003, Three Direct-Fired Kilns

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
001	Direct-fired kiln No. 1
002	Direct-fired kiln No. 2
003	Direct-fired kiln No. 3

Direct-fired Kiln Nos. 1 and 2

A wood drying kiln manufactured by Irvington Moore/Energy Sys with a design capacity of 123 thousand board feet (Mbf)/charge and a maximum heat input rate for the wood burner of 26 MMBtu/hr. The emissions from each kiln are uncontrolled.

Direct-fired Kiln No. 3

Kiln No. 3 is manufactured by Irvington Moore/Energy Systems. The kiln has a capacity to load up to 155,000 board feet (Mbf)/charge and a maximum heat input rate of 29.5 MMBtu/hr. The emissions from the kiln are uncontrolled.

The drying of the lumber is accomplished by wood-fueled burner in each kiln. The heated air inside each kiln is circulated by fans during each drying cycle over the green lumber stacked inside. Gases from each drying kiln (products of the combustion from the kiln burner, volatile organic compounds (VOC), hazardous air pollutants (HAP), and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. Gases also escape as fugitive emissions through the kiln doors and other exit points created after each kiln has undergone multiple heating and cooling cycles.

{Permitting note: These emissions units are regulated under Rule 62-296.410(2)(a), F.A.C., for Carbonaceous Fuel Burning Equipment. The units are affected sources of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. However, the kilns are not required to comply with any compliance/operating requirement, and the work practice standards, except for the initial notification requirements in 40 CFR 63.9(b) according to 40 CFR 63.2252}

EQUIPMENT

1. Three direct-fired kilns: The permittee is authorized to install and operate three batch wood drying lumber kilns manufactured by Irvington Moore/Energy Systems. Two, kilns shall have design capacity of 123 thousand board feet (MBf)/charge and be equipped with a direct-fired burner with a maximum heat input of 26 MMBtu/hour direct-fired kilns and one kiln shall have a design capacity of 155MBf/charge and equipped with a direct-fired burner with a maximum heat input of 29.5 MMBtu/hour. [Application No. 0290018-001-AC, Rule 62-210.200(PTE), F.A.C.]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum throughput rate of three kilns combined shall not exceed 100,000 Thousand Board Feet (Mbf) per 12-month rolling period. [Application 0290018-001- AC, Rule 62-210.200(PTE), F.A.C., Rule 62-4.070, F.A.C., 62-212.400(12) and PSD Major Source Avoidance]
3. Permitted Capacity – Heat Input: The maximum heat input of Emissions Units 001 and 002 shall not exceed 26 MMBtu/hr each. The maximum heat input of Emissions Unit 003 shall not exceed 29.5 MMBtu/hr. [Rule 62-210.200(PTE), F.A.C, Application No. 0290018-001-AC]
4. Authorized Fuel: The emission units are authorized to burn green sawdust as a fuel. Diesel fuel shall be used for startup only. [Application No. 0290018-001-AC and Rule 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 001, 002 and 003, Three Direct-Fired Kilns

5. Restricted Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

6. Visible Emissions. Visible emissions from the vents of each Emissions Unit shall not exceed 20 percent opacity except that visible emissions not exceeding 27 percent opacity shall be allowed for one-six minute period in any one-hour period. [Application No. 0290018-001-AC and Rule 62-296.410(2)(a), F.A.C.]

TESTING REQUIREMENTS

7. Initial Compliance Tests: Each emissions unit shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]
8. Testing Duration Visible Emissions (VE): The minimum observation period of the Method 9 test observation shall be 1 hour (10 6-minute averages). [62-297.310(5)(b)]
9. Annual Compliance Tests: During each calendar year (January 1st to December 31st), each emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions. [Rule 62-297.310(8)(a)1, 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(9), F.A.C.]
11. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are 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, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(10), F.A.C.]
13. Operational Data: The permittee shall maintain the following records and retain them on site for five years:
- The amount of sawdust burned in each kiln in tons per month for 12-consecutive months.
 - The amount of wood dried in each kiln (board-feet) for the previous calendar month; and,
 - The amount of wood dried in each kiln (board-feet) for the previous 12 calendar months of operation.
- [Application No. 0290018-001-AC and Rule 62-4.070(3), F.A.C.]
14. Initial Notification/Initial Startup Date Reporting: The Permittee shall notify the Compliance Authority of the actual date of initial startup of the facility. The notification may be in writing or sent electronically within 15 days after such date: Christopher.Kirts@dep.state.fl.us. [40 CFR 63.2280(b), Rule 62-4.070, F.A.C., Rule 2.1401, JEPB]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 001, 002 and 003, Three Direct-Fired Kilns

15. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.