Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Pure Pine, LLC
Post Office Box No. 128
Williston, Florida 32696

Authorized Representative:
Mr. Eddie Hodge, President

Air Permit No. 0750086-006-AC
Permit Expires: 9/25/2016
Air Construction Permit

Project: New Wood Shavings Dryer and Cyclone

PROJECT

This is the final air construction permit, which authorizes the installation of an additional Wood Shavings Dryer, and cyclone. The proposed work will be conducted at the existing Pure Pine, LLC plant, which is a Wood Processing Plant (Standard Industrial Classification No. 2426). The facility is located in Levy County at approximately 3 miles E of SR 41 in Williston, Florida. The UTM coordinates are Zone 17, 361.00 km East, and 3244.00 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

Richard S. Rachal III, P.G.
Program Administrator
Permitting Program

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) and all copies were sent before the close of business on September 25, 2015 to the listed persons.

Eddie Hodge, Pure Pine, LLC- (derbygoldinfo@aol.com)
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Leslie Maybin
Clerk

September 25, 2015
Date

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 0750086	
EU ID No.	Emission Unit Description
001	16.0 MMBtu/hr wood-fired burner & rotary dryer. Air Pollution Control Equipment: One (1) Heil Cyclone. Gas Volume.....500 ACFM Gas Temperature.....150 °F Removal efficiency .....estimated to be 99% (for shavings)

The facility operates a 16.0 MMBtu/hr, Wood-Fired, Triple-Pass, Rotary Dryer. This facility produces both wet and dried wood shavings for use in animal bedding.

Wet logs are processed through one of five shaving machines (two of which are electric shaving mills) and cut into the desired size. Each of the shaving machines has a maximum capacity of about 40 yards of shavings per hour. Wet shavings are fed through the rotary dryer to reduce moisture. From the rotary dryer, the shavings are routed to a cyclone and through a screen system in order to separate the wood shavings from the smaller wood particles (fines and sawdust). The separated fines and sawdust are routed to a storage bin before being feed, by auger, to the combustion zone of the rotary dryer as the fuel source. Some of the wet shavings are shipped directly to the customers. The facility also has two electric pelletizers.

The drying process is equipped with computer controls. The dryer temperature typically varies between 400 °F and 600 °F. The dryer is allowed to operate continuously and the dryer startup time is approximately 30 minutes. The maximum heat input rate for the burner is estimated to be 16 MMBtu/hr, based on 2000 lbs of sawdust burned per hour with a heat value of 8000 Btu/lb.

Particulate Matter emissions from the dryer are controlled by the cyclone. The cyclone is about 10 ft in diameter and about 35 ft tall. The air volumetric flow is approximately 500 cfm.

The dry and wet shavings are sold as product. The production rate of dry shavings is approximately 1 ton/hour. The production rate of dry shavings is determined on a daily basis as the product is packaged. Based on continuous operation, the facility has the potential to produce up to 8,760 tons of dried shavings per year.

PROPOSED PROJECT

This project is to install a second equivalent, if not identical, wood shavings dryer, and cyclone. This will double the production and emissions for the facility. The shavings are screened to remove sawdust which is used to fire the dryer that dries the shavings. The shavings are bagged and delivered to customers by truck.

This project will add the following emissions unit(s).

Facility ID No. 0750086

ID No.	Emission Unit Description
EU002	16.0 MMBtu/hr wood-fired burner & rotary dryer. Air Pollution Control Equipment: One (1) Heil Cyclone **(or equivalent)**. Gas Volume.....…500 ACFM Gas Temperature.....150 °F Removal efficiency ……estimated to be 99% (for shavings)

FACILITY REGULATORY CLASSIFICATION

- The facility **is not** 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 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(PSD), F.A.C.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year, and individual and total hazardous air pollutants are less than 10 and 25 tons per year, respectively in accordance with Chapter 62-210, F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Permitting Program. The Northeast District Office's 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, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number (904) 256-1700.

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); and Appendix D (Common Testing Requirements).

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 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(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Application for Non-Title V Operation Permit Renewal: A completed Application for Air Permit –Non-Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

   [Rules 62-4.030, 62-210.300(1)(a), and 62-4.210.300(2), F.A.C.]

A. EU002 WOOD-FIRED BURNER & ROTARY DRYER

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
002	16.0 MMBtu/hr wood-fired burner & rotary dryer. Air Pollution Control Equipment: One (1) Heil Cyclone **(or equivalent)**. Gas Volume.....500 ACFM Gas Temperature.....150 °F Removal efficiency .....estimated to be 99% (for shavings)

EQUIPMENT

A.1. <u>Wood-Fired Burner & Rotary Dryer</u>. The permittee is authorized to install a wood-fired burner and rotary dryer, and cyclone.

[Application No. 0750086-006-AC]

PERFORMANCE RESTRICTIONS

A.2. <u>Maximum Operation Rate</u>. The maximum heat input rate shall not exceed 16 MMBtu/hour.

[Permit Application No. 0750086-006-AC, Rules 62-4.160(2) & (14)(b), 62-210.200(PTE), F.A.C.]

A.3. <u>Method of Operation- Fuels</u>. The burner is carbonaceous (wood waste) fired.

[Permit Application No. 0750086-006-AC, and Rule 62-210.200(PTE), F.A.C.]

A.4. <u>Hours of Operation</u>. The hours of operation are not restricted: 24 hours/day; 7 days/week; 52 weeks/year (8760 hours/year and 8784 during a Leap Year).

[Permit Application No. 0750086-006-AC, Rules 62-4.160(2) & (14)(b), 62-210.200(PTE), F.A.C.]

A.5. <u>Control Device</u>. The cyclone shall be maintained in good operating condition and shall remain in place at all times during operation. If there is a malfunction on the control unit, the owner or operator shall immediately take corrective actions to minimize emissions.

[Rule 62-4.070(3) F.A.C]

EMISSIONS STANDARDS

A.6. <u>Wood-Fired Burner & Rotary Dryer -Visible Emissions</u>. The Visible emissions from this emissions unit shall not exceed 20 percent opacity except for 27 percent opacity for not more than 6 minutes in any one hour.

[Rule 62.296.410(2)(a), F.A.C.]

TESTING REQUIREMENTS

A.7. Initial Compliance Tests. The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for VE. 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.]

A.8. Annual Compliance Tests. The Visible Emissions test method shall be EPA Method 9, as described in 40 CFR Part 60, Appendix A-4. During each calendar year (January 1st to December 31st), the emissions unit shall be tested to demonstrate compliance with the emissions standards for VE.

[Rule 62-297.310(8)(a)1, F.A.C.]

RECORDS AND REPORTS

A.9. Recordkeeping. Owner or operator shall record the following data:

a. Monthly production rate for dried shavings.
b. Monthly VOCs, individual HAP and total HAPs emissions.
c. Total estimated emissions of VOC, Individual HAP and Total HAPs for 12-consecutive month.
d. Copy of all calculations and supporting documents for VOC and HAP emission rate estimation.

[Rule 62-4.070(3), F.A.C.]

A.10. 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. For each test run, the report shall also indicate the heat input rate, and if the cyclone was operating during the test.

[Rule 62-297.310(10), F.A.C.]

A.11. Commencement of Construction and Operation. The permittee shall submit to the Air Compliance Authority of this Office written notification of both the date of commencement of construction and commencement of operation of (EU002) Wood-Fired Burner and Rotary Dryer, and cyclone. These notifications shall be submitted to Mr. Christopher L. Kirts at Christopher.kirts@dep.state.fl.us, within as many days prior to the date of construction as practical, but no later than fifteen (15) business day following commencement of construction and operation.

[Rule 62-4.070(3), F.A.C.]

A.12. This facility is subject to the attached Appendices A, B, C, and D.