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. 0750086-007-AO
Air Operation Permit

Pure Pine, LLC
AO Modification
Levy County, Florida

PROJECT

This is the final air operation permit for the modification of Pure Pine, LLC to include the new Wood Shavings Dryer authorized under Air Permit No. 0750086-006-AC, 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.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency

determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

0750086-007-AO Modification Date: August 19, 2016
0750086-005-AO Effective Date: January 12, 2015
Renewal Application Due Date: March 8, 2017
Expiration Date: May 7, 2017

Executed in Jacksonville, Florida

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

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 August 19, 2016 to the listed persons.

Eddie Hodge, Pure Pine, LLC- (derbygoldinfo@aol.com)
Will Irby, Pure Pine, LLC- (www4w@aol.com)
Pradeep Raval, Koogler & Associates- (praval@kooglerassociates.com)

Leslie Maybin — August 19, 2016
Clerk — Date

FACILITY DESCRIPTION

The facility operates two (2) 16.0 MMBtu/hour, Wood-Fired, Triple-Pass, Rotary Dryers. 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. Both dryer's temperatures typically vary between 400 °F and 600 °F. These dryers are allowed to operate continuously and the startup time is approximately 30 minutes. The maximum heat input rate for each burner is estimated to be 16 MMBtu/hour, based on 2000 lbs of sawdust burned per hour with a heat value of 8000 Btu/lb.

Particulate Matter emissions from the dryers are controlled by cyclones. The cyclones are 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.

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
001	16.0 MMBtu/hour 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)
002	16.0 MMBtu/hour 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)

Compliance: The stack atop the burner is not an exhaust point to the atmosphere; it is an opening for ambient air intake. If "blue haze" emissions occur through cyclone's stack (exhaust), it means that the gases are too hot and the wood's resin is being cooked out. During the winter there may be a white, condensed water vapor plume visible from the cyclone's stack (exhaust). It is preferable that VE test be conducted during warm weather. It is expected that only small amounts of PM (ashes and/or sawdust) will escape as emissions from the cyclone. If a significant amount of PM emissions is observed, it may be an indication of improper operation, malfunction, or the potential PM emissions were underestimated.

FACILITY REGULATORY CLASSIFICATION

- The facility **is not** 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 not** 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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. 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. (EU001) 16.0 MMBtu/hr wood-fired burner & rotary dryer

This section of the permit addresses the following emissions unit.

Facility ID No. 0750086	
EU ID No.	Emission Unit Description
001	16.0 MMBtu/hour 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)

{This facility is subject to the requirements of Rule 62.296.410, F.A.C}

PERFORMANCE RESTRICTIONS

A.1. **Hours of Operation**. 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 No. 0750086-004-AC, Rules 62-4.160(2) and (14)(b), and 62-210.200(PTE), F.A.C.]

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

[Permit No. 0750086-004-AC, Rules 62-4.160(2) and (14)(b), and 62-210.200(PTE), F.A.C.]

A.3. **Method of Operation- Fuels**. The burner is carbonaceous (wood waste) fired.

[Permit No. 0750086-001-AC, and Rule 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.4. **Wood-Fired Burner & Rotary Dryer -Visible Emissions**. 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.

[Permit No. 0750086-004-AC, and Rule 62.296.410(2)(a), F.A.C.]

A.5. **Control Device**. 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.

[Permit No. 0750086-004-AC, and Rule 62-4.070(3) F.A.C]

TEST METHODS AND PROCEDURES

A.6. **Visible Emissions – Annual Compliance Tests Required**. A performance test shall be conducted on an annual basis during each calendar year (January 1st to December 31st).

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

A.7. **Compliance Tests Prior to Renewal**. Prior to obtaining a renewed operation permit, the emissions unit shall be tested to demonstrate compliance with the emissions standards for VE. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see Appendix D – Common Testing Requirements). The Visible Emissions test method shall be EPA Method 9, as described in 40 CFR Part 60, Appendix A-4 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 62-210.300(2)(a); 62-297.310(8)(b), F.A.C.; 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.7. **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.; and Permit No. 0750086-001-AC]

A.8. **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.

[Permit No. 0750086-001-AC; and Rule 62-297.310(10), F.A.C.]

A.9. This EU is subject to the attached Combined Appendices.

B. (EU002) 16.0 MMBtu/hr wood-fired burner & rotary dryer

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
002	16.0 MMBtu/hour 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)

Initial startup date: July 2016. Stack height is 30 feet.

{This facility is subject to the requirements of Rule 62.296.410, F.A.C}

PERFORMANCE RESTRICTIONS

B.1. **Maximum Operation Rate**. The maximum heat input rate shall not exceed 16 MMBtu/hour.

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

B.2. **Method of Operation - Fuels**. The burner is carbonaceous (wood waste) fired.

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

B.3. **Hours of Operation**. 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 No. 0750086-006-AC, Rules 62-4.160(2) a (14)(b), 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

B.4. **Wood-Fired Burner & Rotary Dryer -Visible Emissions**. 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.; and Permit No. 0750086-006-AC]

TESTING REQUIREMENTS

B.5. **Visible Emissions – Annual Compliance Tests Required**. A performance test shall be conducted on an annual basis during each calendar year (January 1st to December 31st).

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

B.6. **Compliance Tests Prior to Renewal**. Prior to obtaining a renewed operation permit, the emissions unit shall be tested to demonstrate compliance with the emissions standards for VE. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see Appendix D – Common Testing Requirements). The Visible Emissions test method shall be EPA Method 9, as described in 40 CFR Part 60, Appendix A-4 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 62-210.300(2)(a); 62-297.310(8)(b), F.A.C.; 62-204.800, F.A.C.; Appendix A of 40 CFR 60; and Permit No. 0750086-006-AC]

B.7. **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.]

RECORDS AND REPORTS

B.8. **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.; and Permit No. 0750086-006-AC]

B.9. **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.; and Permit No. 0750086-006-AC]

B.10. This EU is subject to the attached Combined Appendices.