Jeb Bush Governor		M. Rony François, M.D., M.S.P.H., Ph.D. Secretary, Department of Health

AIR POLLUTION OPERATION PERMIT

PALM BEACH COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH AND ENGINEERING
P.O. Box 29 (901 Evernia Street)
West Palm Beach, Florida 33402-0029
Telephone: (561) 355-3136

ISSUED TO:

Permittee:
South Florida Shavings Company
10191-b Lantana Road
Lake Worth, FL 33467

Authorized Representative:
Hillel Frishman, President

ARMS No.:	0990562
Permit No:	0990562-003-AO
Issued:	November 30, 2005,
Expires:	November 29, 2010

Note: A renewal application must be submitted by September 1, 2010

LOCATED AT:

South Florida Shavings Company
10191-b Lantana Road
Lake Worth, FL 33467

UTM: Zone 17; 579.2 km E; 2941.1 km N
SIC No. 2499, Wood Products, Not Elsewhere Classified
Description: Wood Shavings Dryer

STATEMENT OF BASIS:

The Palm Beach County Health Department (Health Department) issues this permit under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4 through 62-297 the Florida Administrative Code (F.A.C.). The Florida Department of Environmental Protection (DEP) has permitting jurisdiction under Chapter 403.087, F.S. However, in accordance with Section 403.182, F.S., the DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that delegates to the Health Department the authority to issue or deny permits for this type of air pollution source located in Palm Beach County. The above named permittee is authorized to operate the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Health Department.

ISSUED BY:

Executed in West Palm Beach, Florida.
PALM BEACH COUNTY HEALTH DEPARTMENT

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James E. Stormer, Q.E.P., Environmental Administrator
Air Pollution Control Section
Division of Environmental Health and Engineering

Air Permit Engineer: Antoine Devonshire
Filename: 5620003.pmt

SECTION I. SUMMARY INFORMATION

PERMIT HISTORY

- 12-15-98: PBCHD issued initial construction permit no. 0990562-001-AC
- 09-13-00: PBCHD issued extension to construction permit no. 0990562-001-AC
- 11-30-00: PBCHD issued initial operation permit no. 0990562-002-AO
- 10-14-05: PBCHD received application for operation permit renewal
- 11-02-05: PBCDH determined application complete

REGULATORY CLASSIFICATION

Title III:	The facility is not a major source of hazardous air pollutants (HAPs)
Title IV:	The facility will not operate units subject to the acid rain provisions of the Clean Air Act.
Title V:	The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
PSD:	The facility is not a PSD major source in accordance with Rule 62-212.400 F.A.C.
RACT:	The facility is not subject to any RACT requirements in accordance with guidance issued by the Florida Department of Environmental Protection.
NSPS:	The facility is not subject to any requirements of 40 CFR 60.
NESHAP:	The facility is not subject to the requirements of 40 CFR 61.

This facility is classified as a non-Title V, minor source of air pollution. The wood shavings dryer is classified as “carbonaceous fuel burning equipment” subject to Rule 62-296.410, F.A.C. This source supplies chipped dried wood shavings to be used as bedding materials primarily in horse stables.

RULE APPLICABILITY

This facility is located in Palm Beach County, an area designated as "maintenance" for the pollutant ozone and attainment for all other criteria pollutants in accordance with Rule 62-204.340, F.A.C. The facility is not subject to review under Rule 62-212.400 F.A.C., Prevention of Significant Deterioration (PSD), because this source is “minor” for the purpose of PSD regulations (having a potential to emit less than 250 tons per year of pollutant). The facility is subject to the following air pollution control provisions:

- **F.A.C. Chapter 62-4 - Permits.**
- *F.A.C. Rule 62-4.160 - General Permit Conditions.*
- **F.A.C. Chapter 62-204 - Air Pollution Control - General Provisions**
- **F.A.C. Chapter 62-210 - Stationary Sources - General Requirements.**
- *F.A.C. Rule 62-210.300 - Permits Required.*
- *F.A.C. Rule 62-210.350 - Public Notice and Comment.*
- *F.A.C. Rule 62-210.370 - Reports.*
- *F.A.C. Rule 62-210.650 - Circumvention.*
- *F.A.C. Rule 62-210.700 - Excess Emissions.*
- **F.A.C. Chapter 62-212 - Stationary Sources - Preconstruction Review**
- *F.A.C. Rule 62-212.300 - General Preconstruction Review Requirements*
- **F.A.C. Chapter 62-296 - Stationary Sources - Emissions Standards**
- *F.A.C. Rule 62-296.320 - General Pollutant Emission Limiting Standards.*
- **F.A.C. Chapter 62-297 - Stationary Sources - Emissions Monitoring**
- *F.A.C. Rule 62-297.310 - General Test Requirements.*
- *F.A.C. Rule 62-297.400 - EPA Test Methods Adopted by Reference*

PERMIT CONTENT

- Section I: Summary Information
- Section II: Facility-Wide Specific Conditions

SECTION I. SUMMARY INFORMATION

- Section III: Emissions Unit Specific Conditions
- Section IV: Appendices
  Appendix A: General Permit Conditions
  Appendix B: Citation Format

EMISSIONS UNITS SUMMARY

This permit addresses the following emissions units:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
01	Wood Shavings Dryer

1.0 ADMINISTRATIVE

1.1 Regulating Agencies: All applications, reports, tests, and notifications shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department (Health Department) at P.O. Box 29 (901 Evernia Street), West Palm Beach, Florida, 33402-0029, and phone number (561) 355-3136. In addition, *copies* shall be submitted to the Air Program, Southeast District Office, Florida Department of Environmental Protection (DEP) at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida, 33416-5425. **[Specific Operating Agreement]**

1.2 General Permit Conditions: The owner and operators shall be aware of, and operate under, the attached General Permit Conditions listed in *Appendix A* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C.]**

1.3 Citation Format: The format for citing applicable regulations is provided in *Appendix B* of this permit.

1.4 Application for Operation Permit: The permittee shall apply for a renewal permit at least 60 days prior to the expiration of this operation permit. The application shall include: the Short Form Application *[DEP Form No. 62-210.900(2)]*; the correct application processing fee; all required test reports; and a summary of any changes or substitutions to the original equipment, processes, fuels, controls, etc. When the renewal application is timely and sufficient, the existing permit shall remain in effect until final action is taken by the Health Department. **[Rules 62-4.090 and 62-210.900, F.A.C.]**

1.5 Applicable Regulations: This facility is subject to the following regulations: Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. *Specifically, the wood shavings dryer is classified as "carbonaceous fuel burning equipment" subject to Rule 62-296.410, F.A.C.* Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300(2), F.A.C. and the SOA]**

2.0 EMISSION LIMITING STANDARDS

2.1 General VOC Standards: The owner or operator shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents without applying known and existing vapor emission control devices or systems **[Rule 62-296.320(1), F.A.C.]**

2.2 Objectionable Odors: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320(2), F.A.C.]**

Note: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-210.200(200), F.A.C.]

2.3 General Visible Emissions Standard: Unless otherwise specified by permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from new, or existing emissions units, the opacity of which is equal to or greater than 20 percent. **[Rule 62-296.320(4)(b), F.A.C.]**

2.4 Unconfined Emissions of 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 include the following: **[Rule 62-296.320(4)(c), F.A.C.]**

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- Removal of particulate matter from roads and 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.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

Note: Facilities that cause frequent, valid complaints will be required by the Health Department to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular facility, the Health

Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

3.0 PERFORMANCE STANDARDS

3.1 Circumvention: The owner or operator shall not circumvent air pollution control equipment/methods or allow the emission of air pollutants without the equipment/methods operating properly. **[Rule 62-210.650, F.A.C.]**

3.2 Excess Emissions Requirements **[Rule 62-210.700, F.A.C.]**

(a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Health Department for longer duration. **[Rule 62-210.700(1), F.A.C.]**

(b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction are prohibited. **[Rule 62-210.700(4), F.A.C.]**

(c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Pollution Control Section of the Palm Beach County Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. **[Rule 62-210.700(6), F.A.C.]**

4.0 COMPLIANCE MONITORING REQUIREMENTS

4.1 Duration: Unless otherwise specified, all records and reports required by this permit shall be kept for at least 3 years from the date the information was recorded. **[Rule 62-4.160(14)(b), F.A.C.]**

4.2 Test Procedures shall meet all applicable requirements of the Chapter 62-297, F.A.C. See *Appendix D* of this permit for a summary of these requirements. **[Rule 62-297.100, F.A.C.]**

4.3 Operational Rate During Testing: Unless otherwise stated in the applicable emission limiting standard for a rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. 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. **[Rule 62-297.310(2), F.A.C.]**

4.4 Test Notification: The owner or operator shall notify the Health Department, in writing, at least 15 days prior to the date on which each formal compliance test is to begin, of the test date, the expected test time, the location of the test, the facility contact person responsible for coordinating the test, and the person or company conducting test. The 15 day notification requirement may be waived at the discretion of the Health Department. Likewise, if circumstances prevent testing during the test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. **[Rule 62-297.310(7)(a)9., F.A.C.]**

4.5 Special Compliance Tests**:** When the Health 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 DEP rule or permit is being violated, it shall 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 Health Department. **[Rule 62-297.310(7)(b), F.A.C.]**

5.0 REPORTS REQUIRED

5.1 Annual Operations Report: Before March 1st of each year, the owner or operator shall submit an Annual Operations Report *[DEP Form No. 62-210.900(5)]* to the Health Department which summarizes operations for the previous calendar year. **[Rule 62-210.370(3), F.A.C.]**

5.2 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Air Compliance Section of the Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess

emissions; and the actions taken to correct the problem. In addition, the Health Department may request a written summary report of the incident. **[Rules 62-4.130 and 62-210.700(6), F.A.C.]**

5.3 Emission Compliance Stack Test Reports: For each required emissions compliance test, a report indicating the results of the test shall be filed with the Health Department as soon as practical, but no later than 45 days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Health Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8)(c), F.A.C.** and summarized in *Appendix D* of this permit. Additional report information may be specified for a given group of emissions units in this permit. **[Rule 62-297.310(8), F.A.C.]**

6.0 WASTE REQUIREMENTS

6.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not preclude the permittee from securing any other types of required permits, licenses, or certifications.

GROUP A. This portion of the permit addresses the following group of emissions units:

EU ID NO.	EMISSIONS UNIT DESCRIPTION
001	This emissions unit is a **wood shavings dryer** consisting of: a wet chip conveyor; a combustion furnace; a rotary drum dryer; a cyclone; a waste wood screen; a waste wood storage silo; a dry chip conveyor; and an induced draft fan. Pine logs are planed into wood shavings inside the production building and conveyed to the rotary drum dryer. An induced draft fan pulls the shavings through three concentric chambers in the rotary dryer exposing wet shavings to a temperature of about 250°F. Shavings then pass through the fan and are roughly chopped. A dry cyclone removes the shavings from the exhaust stream. Shavings drop from the bottom of the cyclone onto a screen that removes waste wood too small to use as the final product. The dry wood shavings are conveyed back into the production building for bagging. The waste wood falls through the screen and is transferred to a storage silo. Waste wood is transferred by auger to the combustion furnace where it is burned as a fuel, providing heat to the rotary drum dryer. Exhaust gas leaves the combustion furnace in excess of 1000°F and is mixed with ambient air to provide a heated gas stream of about 250°F to the rotary drum dryer. The initial fire in the combustion furnace is started by hand with dry kindling and *no solvent-containing fuel*.

1.0 DEFINITIONS

1.1 Carbonaceous Fuel: Solid materials composed primarily of vegetative matter such as tree bark, wood waste, or bagasse.
[Rule 62-210.200(60), F.A.C.]

1.2 Carbonaceous Fuel Burning Equipment: A firebox, furnace or combustion device which burns carbonaceous and fossil fuels for the primary purpose of producing steam or to heat other liquids or gases. The term includes bagasse burners, bark burners, and waste wood burners, but does not include teepee or conical wood burners or incinerators.
[Rule 62-210.200(61), F.A.C.]

2.0 EQUIPMENT SPECIFICATIONS

2.1 Process and Production Equipment: The permittee is authorized to operate the following equipment:

(a) Model No. 10 combustion furnace manufactured by Energy Control Engineering, with the following specifications:

- A design operating temperature of 1000°F
- A maximum waste wood feed rate 500 pounds per hour (approximately 4 mmBTU per hour of heat input); and
- Equipment to monitor the operating temperature.

(b) Model No. 824 rotary drum dryer manufactured by Hiel, *or its equivalent*, with the following specifications:

- A maximum wet wood shavings feed rate of 6000 pounds per hour;
- A maximum dry wood shavings production rate of 3900 pounds per hour;
- A designed drying temperature of 250°F; and
- Equipment to monitor the drying temperature.

(c) Induced draft fan with the following specifications:

- Powered by a 60 hp electric motor; and
- A maximum flow rate of 4000 actual cubic feet per minute at 1725 rpm.

(d) All necessary support equipment including a wet chip conveyor, waste wood screen, a waste wood storage silo, a dry chip conveyor, and connecting ductwork.

[Air Permit Application No. 099-0562-001-AC]

3.0 AIR POLLUTION CONTROL EQUIPMENT AND METHODS

3.1 Dry Cyclone Collector: The permittee shall operate a dry cyclone collector to remove wood shavings and waste wood from the exhaust gas stream before discharging to the ambient air. The cyclone shall be operated, and maintained in accordance with the manufacturer's recommendations and the following specifications:

- Model No. 8X21 dry cyclone collector manufactured by Jackson Equipment; and
- A control efficiency of 75% for particles greater than 2.5 microns in diameter.

[Rules 62-4.070(1), 62-4.210(1), F.A.C.]

3.2 Good Combustion Practices: The permittee shall use good combustion practices to minimize air pollutant emissions resulting from incomplete combustion in the furnace. Good combustion practices shall be defined by the equipment manufacturer and include monitoring and adjusting parameters such as wood waste feed rate, combustion furnace operating temperature, combustion air flow rates, etc.
[Rules 62-4.070(1), 62-4.210(1), F.A.C.]

4.0 EMISSION LIMITING AND PERFORMANCE STANDARDS

4.1 Visible Emissions: Visible emissions from the cyclone exhaust stack shall not exceed 20 percent opacity except that visible emissions not exceeding 40 percent opacity are allowed for up to two minutes in any one hour period.
[Rule 62-296.410(2)(a), F.A.C.]

5.0 COMPLIANCE MONITORING REQUIREMENTS

5.1 Test Methods and Procedures: Within 30 days of completing the installation and ensuring proper functioning of the equipment, the permittee shall conduct a test to demonstrate compliance with the visible emissions standards in accordance with the following methods and requirements.

(a) The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.

(b) The test shall be conducted for a minimum of 60 minutes.

(c) The test shall be conducted while operating between 90 to 100% of the maximum wet wood shavings feed rate to the rotary drum dryer. In addition, the combustion furnace shall be maintained near the design operating temperature of the combustion furnace. The combustion furnace temperature and the rotary drum dryer temperature shall be manually recorded at the beginning of the test, at each 15 minute interval, and at the end of the test.

(d) The test observer shall also comment on whether or not any emissions were observed during the test from the stack supplying the cool ambient air that mixes with the hot furnace exhaust gas.

[Rule 62-296.410(3) and 62-297.310(4)(a), F.A.C.]

5.2 Frequency of Testing: A successful compliance test for visible emissions for the unit shall be conducted annually between June 1st and August 1st. **[Rule 62-297.310(7)4.a., F.A.C.**

6.0 REPORTS REQUIRED

6.1 Visible Emissions Test Report: The compliance test report for visible emissions shall include the following information:

(a) Visible emissions observation form and proof of observer certification;

(b) A summary of the tested opacity including the highest 6-minute average opacity, the highest 2-minute average opacity, and the number of 6-minute average opacities greater than 20%;

(c) The wet wood shavings feed rate in pounds per hour;

(d) A written record of the combustion furnace and rotary drum dryer operating temperatures; and

(e) Observer comments on whether or not any emissions were observed during the test from the stack supplying cool ambient air that mixes with the hot furnace exhaust gas.

[Rules 62-296.410(3) and 62-297.310(8), F.A.C.]