Florida Department of Environmental Protection

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Secretary

PERMITTEE:

Georgia Pacific Wood Products, LLC.
223 Gordon Chapel Road
Hawthorne, Florida 32640

I.D. Number:	1070015
Permit/Cert Number:	1070015-018-AC
Date of Issue:	Draft
Expiration Date:	
County:	Putnam
Latitude/Longitude:	29° 35' 30" N; 82°02' 15" W
UTM:	Zone 17, E. 399.6, N. 3273.8
Project:	Permit Revision

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

PROJECT

To incorporate the Health Based Compliance Alternative (HBCA) for complying with the Total Selected Metals (TSM) emission standards in 40 CFR 63, Subpart DDDDD, based on the sum of emissions for seven selected metals (by excluding manganese emissions from the summation of TSM emission.) for the wood fired boiler (EU 001).

This project is also to revise the restriction on hours of operation for emissions unit 001 established on permit No. 1070015-010-AC, and to define the method of operation for the electrostatic precipitator (ESP).

PROJECT DESCRIPTION

The wood fired boiler (EU001) is subject to Subpart DDDDD--National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

The applicant has demonstrated that the unit is eligible to comply with the Total Selected Metals (TSM) emission standards in 40 CFR 63, Subpart DDDDD, based on the sum of emissions for seven selected metals (by excluding manganese emissions from the summation of TSM emission.).

The applicant has demonstrated the eligibility for Health Based Compliance Alternative by performing a site-specific compliance demonstration and shows that the maximum Hazard Quotient (HQ) for manganese from EU 001 is less than or equal to 1.0.

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EMISSIONS UNIT DESCRIPTION

The unit provides steam for heating various processes and is fueled by wood. The Wood Fired Boiler consists of two multi-clone ash re-injection systems and an Electro-Static Precipitator [ESP] to control particular matter emissions. Ash from the multi-cyclone collectors is directly re-injected into the boiler through a closed system.

The ESP (Manufacturer: PPC Industries, Model: 20R –1330-3712S) consists of 3 cells.

OPERATING LOCATION

Located at 223 Gordon Chapel Road, Hawthorne, Putnam County, Florida.

REGULATORY CLASSIFICATION

The facility is classified as a Title V source. The facility is also classified as major source of hazardous air pollutants (HAPs) and major source of air pollutants, other than hazardous air pollutants.

The emissions unit of this project is as defined below

E.U. ID No.	Brief Description
001	Wood Fired Boiler

RULE APPLICABILITY

The unit is subject to the following regulations:

- **Chapter 62-4, F.A.C. - Permits**
- Rule 62-4.160, F.A.C.- General Permit Conditions
- Rule 62-4.130, F.A.C. – Plant Operation - Problems
- **Chapter 62-210, F.A.C. – Stationary Sources – General Requirements**
- Rule 62-210. 300, F.A.C. – Permits Required
- Rule 62-210. 350, F.A.C. – Public Notice and Comment
- **Chapter 62-212, F.A.C. – Stationary Sources – Preconstruction Review**
- Rule 62-212.400 (6), F.A.C. - Best Available Control Technology (BACT) Determination
- **Chapter 62-296, F.A.C. – Stationary Sources – Emissions Standards**
- Rule 62-296.320, F.A.C.- General Pollutant Emissions Limiting Standards
- Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment
- **Chapter 62-297, F.A.C. – Stationary Sources – Emissions Monitoring**
- Rule 62-297.310, F.A.C. – General Test Requirements
- **40 CFR 63 NESHAPs Title III, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.**
- **40 CFR 64, Compliance Assurance Monitoring**

ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT

Appendix GC General Conditions

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit – Long Form received September 13, 2006.
Request for Additional Information dated October 20, 2006.
Additional Information received January 18, 2007.

EMISSIONS UNIT (S) SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: The hours of operation are not restricted.
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

2. Maximum Heat Input Rate: The Maximum heat input rate shall not exceed 224 MMBTU per hour.
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

3. Method of Operation: The unit is fired with green and dry wood. The pilot burner is fired with propane. The electrostatic precipitator shall be operated with at least two cells during normal operation.
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

4. Stack Information. The stack height is 82 feet and 6 feet in diameter. The stack location is UTM Zone 17, E.399.53110, N.3273.81982.
[Rules 62-4.160(2), F.A.C.]

HEALTH BASE COMPLIANCE ALTERNATIVE (HBCA)

5. Health Base Compliance Alternative Eligibility: The unit is eligible to comply with the Total Selected Metals (TSM) emission standards in 40 CFR 63, Subpart DDDDD, based on the sum of emissions for seven selected metals (by excluding manganese emissions from the summation of TSM emission.). *Total selected metals* means the combination of the following metallic HAP: arsenic, beryllium, cadmium, chromium, lead, manganese, nickel and selenium.

6. Manganese Emissions Limit: The manganese emissions from the unit shall not exceed 0.53 lbs/hr, 2.32 tons/year. This limit is based on annual average. The unit is assumed to be in compliance with the manganese emissions limit when;
    a. The PM emissions from the annual stack testing is 0.10 lb/MMBtu or less, and
    b. The unit's operating rate is 224 MMBtu/hour or less on annual average basis.

    If the unit cannot meet the criteria as described above, the owner or operator shall conduct performance test or fuel analysis for manganese in order to demonstrate compliance with TSM emissions limit (see specific condition 8). The owner or operator shall update the eligibility demonstration and resubmit it to the Department for review and approval.

7. Eligibility Demonstration Update: The owner or operator shall update the eligibility demonstration and resubmit it each time that any of the parameters that defined the unit as eligible for the health-based compliance alternatives changes in a way that could result in increased HAP emissions or increased risk from exposure to emissions. These parameters include, but are not limited to, fuel type, fuel mix (annual average), type of control devices, HAP emission rate, stack height, process parameters (e.g., heat input capacity), relevant reference values, and locations where people live).

EMISSIONS UNIT (S) SPECIFIC CONDITIONS:

8. If the owner or operator is updating the eligibility demonstration to account for an action in specific condition 7 that is under his/her control (e.g. change in heat input capacity of the boiler), the owner or operator shall submit the revised eligibility demonstration to the permitting authority prior to making the change and revise the permit to incorporate the change. If the unit is no longer eligible for the health-based compliance alternatives, then the owner or operator shall comply with the applicable emission limits, operating limits, and compliance requirements in subpart DDDDD prior to making the process change and revising the permit. If the owner or operator is updating the eligibility demonstration to account for an action in specific condition 7 that is outside of his/her control (e.g. change in a reference value), and that change causes the unit to no longer be able to meet the criteria for the health-based compliance alternatives, the owner or operator shall comply with the applicable emission limits, operating limits, and compliance requirements in subpart DDDDD within 3 years.

9. The revised eligibility demonstration may be reviewed by the Department or EPA to verify that the demonstration meets the requirements of appendix A of 40 CFR 63, subpart DDDDD and is technically sound (i.e. use of the look-up tables is appropriate or the site-specific assessment is technically valid). If the owner or operator is notified by the Department or EPA of any deficiencies in his/her submission, the unit will not remain eligible for the health-based compliance alternatives until the Department or EPA verifies that the deficiencies are corrected.

ADMINISTRATIVE

10. The I.D. No. and Project name for this source shall be used on all correspondence.

11. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

12. Modifications. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]

13. 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(1), F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

Christopher L. Kirts, P. E.
District Air Program Administrator

APPENDIX GC - GENERAL CONDITIONS [RULE 62-4.160]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under the conditions of the permit;

   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. a description of and cause of non-compliance; and

b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

        - the date, exact place, and time of sampling or measurements;
        - the person responsible for performing the sampling or measurements;
        - the dates analyses were performed;
        - the person responsible for performing the analyses;
        - the analytical techniques or methods used; and
        - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.