

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

Mr. Dave Stevens  
Manager of Special Products, Forest Products  
Champion International Corporation  
PO Box 3537  
McDavid, Florida 32568

DEP File No. 0330260-001-AC  
PSD-FL-271  
McDavid Sawmill  
Escambia County

Enclosed is Final Permit Number 0330260-001-AC. This permit authorizes the applicant, Champion International Corporation to construct a lumber sawmill with a capacity to produce up to 225 million board feet per year of lumber. This permit is issued pursuant to Chapter 403, Florida Statutes.

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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation


**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 9-10-99 to the person(s) listed:

Mr. Dave Stevens, Champion \*  
Mr. Terry Kassabaum, Champion  
Mr. Tom Davis, P.E., ECT  
Mr. Ed Middleswart, NWD  
Mr. Gregg Worley, EPA  
Mr. John Bunyak, NPS

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52, Florida Statutes,  
with the designated Department Clerk, receipt of  
which is hereby acknowledged.

  
(Clerk)

9-10-99  
(Date)

Z 333 618 139

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>Dave Stevens</i>	
Street Number <i>Champion</i>	
Post Office, State, & ZIP Code <i>McDavid FI</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>9-10-99</i>
<i>0330260-001-AC</i> <i>PSD-FI-271</i>	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

*Dave Stevens, Mgr.  
of Special Products  
Champion Int'l Corp.  
PO Box 3537  
McDavid, FI 32568*

4a. Article Number

*Z 333 618 139*

4b. Service Type

- |   |   |
|---|---|
| <input type="checkbox"/> Registered                     | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail                   | <input type="checkbox"/> Insured              |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD                  |

7. Date of Delivery

*9/14/99*

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

*[Signature]*

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

## FINAL DETERMINATION

Champion International Corporation  
McDavid Sawmill  
DEP File No. 0330260-001-AC, PSD-FL-271

The Department distributed a public notice package on August 2, 1999 to allow the applicant to construct a lumber sawmill with a capacity to produce up to 225 million board feet per year of lumber at the to be located at US Highway 29, Pine Barren, Escambia County. The Public Notice of Intent to Issue was published in the Pensacola News Journal on August 5, 1999.

### COMMENTS/CHANGES

No comments were received by the Department from the public, EPA or FWS.

Comments were received from the applicant by letter dated August 16, 1999.

The applicant commented on the draft permit and the Technical Evaluation and Preliminary Determination. The comments were generally minor in nature. The comments are summarized below and the Department's responses are included following each comment.

The applicant's correspondence listed the new mailing and physical addresses for the sawmill and these will be included in the final permit.

Permit, Section II, Specific Condition 10(c):

The applicant requested that the requirement to pave yards be deleted because the log storage area and the area where logs are delivered and transferred to the sawing and debarking operations by crane will not be paved. Logs in the log storage area will be periodically sprayed with water to preserve the logs and minimize potential fugitive dust emissions.

The requirement to pave yards is included specifically in the language of Rule 62-296.320(4)(c)3.a., F.A.C., as a reasonable precaution to prevent emissions of unconfined particulate matter. However, Rule 62-296.320(4)(c)4., F.A.C., allows the Department to determine, given the factors of this rule, what constitutes appropriate reasonable precautions for a particular facility. Accordingly, the requirement to pave yards will be deleted in the final permit, and a note will be added to state specifically that the log storage area and the area for log transfer by overhead crane to the sawing and debarking operations are not required to be paved. An additional reasonable precaution will be added that states that logs in storage shall be sprinkled with water periodically as needed to minimize the potential for fugitive dust emissions.

Permit, Section II, Specific Condition 10(c):

The applicant requested that the requirement to compact open storage piles be deleted because compaction would render the by-products unusable. The applicant also requested that the note stating that the storage piles would be used only about 10 days per year be deleted because the applicant wants the ability to use the piles for longer than that period of time. The applicant submitted additional calculations of PTE for the piles based on year-round operation to show that emissions are not significant under that scenario.

The requirement to compact the piles will be removed from the final permit, and the note about use of the piles will be rewritten to state that the applicant is not limited in the number of hours per year that the by-product open storage piles may be used. The emissions table on page BD-1 of the BACT Determination will be revised to show that quantifiable fugitive emissions will increase from 16.6 to 17.6 TPY for PM and from 3.3 to 3.8 TPY for PM<sub>10</sub> as a result of the change in utilization of the storage piles.

## FINAL DETERMINATION

Champion International Corporation  
McDavid Sawmill

DEP File No. 0330260-001-AC, PSD-FL-271

Permit, Section II, Specific Condition 11(a):

The applicant pointed out a typographical error in this condition. It will read in the final permit "No person shall store..."

Permit, Section II, Specific Condition 23:

The applicant pointed out a typographical error in this condition. It will require record keeping for five years in the final permit.

Minor errors in the Technical Evaluation described by the applicant are shown, with text revisions below. The Department generally does not issue a revised Technical Evaluation, but rather uses the Final Determination to record necessary revisions to the Technical Evaluation.

Technical Evaluation and Preliminary Determination, Section 3. Project Description:

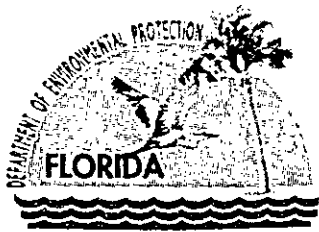
The applicant pointed out that the second paragraph of this section is not completely accurate. It should read "... The drying kilns will be used to reduce lumber moisture content from approximately 50% to ~~about~~ 15 to 20% under controlled conditions of temperature and relative humidity. The drying kilns are each approximately ~~65~~ 98 feet long. ..." The Department generally does not issue revised TEPD documents. This Final Determination will serve to document this revision.

Technical Evaluation and Preliminary Determination, Section 6.4 Emissions Unit 005, Fugitive PM Emissions:

The applicant requested that this section be revised to remove the reference to compacting the temporary outdoor storage piles in accordance with the request above. It should read "... Temporary outdoor storage piles shall be ~~compacted and~~ shaped to minimize wind erosion, ..." The Department generally does not issue revised TEPD documents. This Final Determination will serve to document this revision.

## CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

## PERMITTEE

Champion International Corporation  
McDavid Sawmill  
P.O. Box 3537  
McDavid, Florida 32568

<b>Permit No.</b>	0330260-001-AC PSD-FL-271
<b>Project</b>	Lumber Sawmill
<b>Expires:</b>	September 6, 2000

## Authorized Representative:

Mr. Dave Stevens, Manager of Special Products  
Forest Products

## PROJECT AND LOCATION

This permit authorizes the applicant to construct a lumber sawmill with a capacity to produce up to 225 million board feet per year of lumber. The SIC code for this project is 2421.

The facility is to be located at US Highway 29, Pine Barren, Escambia County, approximately 19 miles north of Pensacola. The street address for the facility is 5590 South Century Boulevard, McDavid, Florida 32568. The UTM coordinates are Zone 16; 468.7 km E; 3406.5 km N. This site is not located within 100 km of any Class I PSD Area. The Breton National Wildlife Refuge is approximately 155 km southwest of the facility.

## STATEMENT OF BASIS

This construction/PSD permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## APPENDICES

The attached appendices are a part of this permit:

Appendix A      NSPS General Provisions  
Appendix B      BACT Determination  
Appendix GC     General Permit Conditions

Howard L. Rhodes, Director  
Division of Air Resources  
Management

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

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**FACILITY DESCRIPTION**

The facility will consist of lumber sawmill with a capacity to produce up to 225 million board feet per year (mmBF/yr) of lumber. The mill will have two natural gas fired boilers that will provide steam to three lumber drying kilns, a planermill to plane and trim dried lumber, and fugitive emissions.

**PROJECT DETAILS**

This project addresses the following emissions unit(s):

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Natural gas fired boiler number 1
002	Natural gas fired boiler number 2
003	Lumber drying kilns 1, 2 and 3
004	Planermill operations
005	Fugitive PM emissions

The applicant proposes to construct this new lumber sawmill consisting of the above emissions units.

[Note: Emissions unit 005 is subject only to the facility-wide specific conditions of this permit specified in Section II.]

**REGULATORY CLASSIFICATION**

This facility is classified as a Major or Title V Source of air pollution because emissions of volatile organic compounds (VOC) exceed 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for VOC, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

The applicant stated that this facility is not a major source of hazardous air pollutants (HAPs).

The emissions units and fugitive sources are subject to limits determined as BACT for VOC, particulate matter, and visible emissions. The boilers are subject to regulation under the New Source Performance Standards: 40 CFR 60 Subpart A, General Provisions, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. However, this regulation only requires record keeping and reporting for natural gas fired boilers. The boilers are also subject to regulation under Rule 62-296.406, F.A.C., for fossil fuel steam generators less than 250 mmBtu/hr, which requires a determination of BACT for sulfur dioxide and particulate matter emissions. The visible emissions provisions of this rule are less stringent than the limit determined as BACT for the boilers.

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

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**REVIEWING AND PROCESS SCHEDULE**

June 15, 1999	Received permit application and fee
July 9, 1999	Department's request for additional information
July 16, 1999	Received partial response to request for additional information
July 26, 1999	Received remainder of response to request for additional information
July 26, 1999	Application complete
August 2, 1999	Distributed Notice of Intent to Issue and supporting documents
August 5, 1999	Notice of Intent published in Pensacola News Journal

**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.

- Permit application
- Department's requests for additional information noted above
- Applicant's additional information noted above
- Department's Technical Evaluation and Preliminary Determination dated July 30, 1999
- Department's Intent to Issue

**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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The following specific conditions apply to all emissions units at this facility addressed by this permit.

**ADMINISTRATIVE**

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Northwest District office at 160 Governmental Center, Pensacola, Florida 32501-5794, phone number 850/595-8300.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC 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.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit 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 Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, 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 or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., 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. Expiration: This air construction permit shall expire on September 6, 2000. The permittee, for good cause, may request that this construction/PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)]

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4)]



## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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7. 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 must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. 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 Department's Northwest District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

#### EMISSION LIMITING STANDARDS

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]
10. Unconfined Emissions of Particulate Matter: [Rules 62-296.320(4)(c) and 62-212.400, F.A.C., and BACT]
  - (a) 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.
  - (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
  - (c) Reasonable precautions include the following:
    - Paving and maintenance of roads and parking areas.
    - 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, oil, 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.

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

[Note: The log storage area and the area for log transfer by overhead crane to the sawing and debarking operations are not required to be paved.]

Additional reasonable precautions applicable to this facility are:

- Wood by-product transfer points shall be enclosed to the extent necessary to minimize the emissions of unconfined particulate matter.
- All by-product (bark, fines (sawdust), chips, shavings) open storage piles shall be shaped and oriented to minimize wind erosion. [Note: The applicant is not limited in the number of hours per year that the by-product open storage piles may be used.]
- The manufacturing area and access roadways for the facility shall be paved with asphalt or concrete.
- The manufacturing area and access roadways for the facility shall be swept or watered as needed to prevent the emissions of unconfined particulate matter.
- Logs in storage shall be sprinkled with water periodically as needed to minimize the potential for fugitive dust emissions.

(d) In determining what constitutes reasonable precautions for a particular source, the 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.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

- (a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Note: An objectionable odor is defined in Rule 62-210.200(203), F.A.C., 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.]

#### OPERATIONAL REQUIREMENTS

12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Northwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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13. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

14. Excess Emissions:

For purposes of this permit, all limits established pursuant to the State Implementation Plan, including those limits established as BACT, include emissions during periods of startup and shutdown, and are not subject to the provisions of Rule 62-210.700(1), F.A.C. This provision can not be used to vary any NSPS requirements from any subpart of 40 CFR 60. 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 shall be prohibited pursuant to Rule 62-210.700(4), F.A.C. [Rules 62-4.070(3) and 62-210.700(5), F.A.C.]

Excess emissions resulting from malfunction of any 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 Department for longer duration. [Rule 62-210.700(1), F.A.C.]

#### COMPLIANCE MONITORING AND TESTING REQUIREMENTS

15. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical 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.]

17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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18. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]
19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]
21. Test Notification: The owner or operator shall notify the Department's Northwest District office and, if applicable, appropriate local program, at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]
22. Special Compliance Tests: When the 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 Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

**REPORTING AND RECORD KEEPING REQUIREMENTS**

23. Duration of Record Keeping: 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. 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 five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the 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 Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. [Rule 62-4.130, F.A.C.]
26. Excess Emissions Report - Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Northwest District office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rule 62-210.700(6), F.A.C.]
27. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Northwest District office by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

The following specific conditions apply to the following emissions units after construction:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Natural gas fired boiler number 1
002	Natural gas fired boiler number 2

[Note: Emissions units 001 and 002 are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.48c) and 40 CFR 60 Subpart A (effective July 1, 1997); are subject to regulation under Rule 62-296.406, F.A.C., for fossil fuel steam generators less than 250 mmBtu/hr, which requires a determination of BACT for sulfur dioxide and particulate matter emissions; are subject to PSD for particulate matter (the visible emissions limit determined as BACT per Rule 62-212.400, F.A.C., is more stringent than the VE limit of Rule 62-296.406, F.A.C.); and are subject to the requirements of the state rules as indicated in this permit. The conditions of this permit effectively limit combined annual emissions from these emissions units (combined) to: PM, 1.4; PM<sub>10</sub>, 1.4; NO<sub>x</sub>, 39.0; CO, 70.2; VOC, 6.5; and SO<sub>2</sub>, 0.3.]

**OPERATIONAL REQUIREMENTS**

1. Hours of Operation: These emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200, F.A.C., Definitions-potential to emit (PTE)]
2. Fuel Limited: These emissions units shall burn only pipeline natural gas. [Rule 62-296.406, F.A.C.]
3. Heat Input Limitation: Heat input to both boilers combined shall not exceed 779,640 million Btu in any consecutive 12-month period, based on the lower heating value (LHV) of natural gas. [Rules 62-210.200, F.A.C., Definitions-potential to emit (PTE), and applicant request to avoid PSD for NO<sub>x</sub> and CO]

**EMISSION LIMITATIONS AND PERFORMANCE STANDARDS**

4. NO<sub>x</sub> Emissions Limited: Emissions of nitrogen oxides from each emissions unit shall not exceed 0.10 pounds per million Btu of heat input (LHV). [Rule 62-4.070(3) and applicant request to avoid PSD]
5. CO Emissions Limited: Emissions of carbon monoxide from each emissions unit shall not exceed 0.18 pounds per million Btu of heat input (LHV). [Rule 62-4.070(3) and applicant request to avoid PSD]
6. Visible Emissions Limited: Visible emissions from each emissions unit shall not exceed 5% opacity. [Rule 62-212.400, F.A.C., and BACT]

**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

7. Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for these emissions units annually using EPA Method 9, as described in 40 CFR 60 Appendix A (1997 version). The owner or operator shall demonstrate compliance with the NO<sub>x</sub> and CO limits for these emissions units initially and upon renewal of each operation permit using EPA Methods 7 or 7E for NO<sub>x</sub> and Method 10 for CO, as described in 40 CFR 60 Appendix A (1997 version). Results shall be expressed in terms of pounds per million Btu of heat input based on the lower heating value (LHV) of the natural gas fired. Testing shall be conducted on each emissions unit

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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every time testing is required. [Rules 62-4.070(3) and 62-212.400, F.A.C., BACT, and applicant request to avoid PSD]

#### REPORTING AND RECORD KEEPING REQUIREMENTS

8. Records of Heat Input Required: The owner or operator shall make and maintain the following records to demonstrate compliance with the heat input limitation of specific condition 3 of this section. Monthly records shall be completed no later than five days after the end of each month.
- An analysis of the lower heating value (LHV) of the natural gas burned, obtained from the gas supplier at least once each calendar quarter.
  - The amount of natural gas burned in both boilers each month.
  - Monthly heat input for both boilers in units of mmBtu per month, calculated as the product of the amount of natural gas burned during each month times the LHV of the natural gas.
  - Rolling 12-month total heat input for both boilers in units of mmBtu per consecutive 12-month period, calculated as the sum of heat input for the current month and the preceding eleven months.
- [Rule 62-4.070(3), F.A.C.]

#### APPLICABLE NSPS SUBPART DC CONDITIONS

9. Pursuant to 40 CFR 60.48c Reporting and Recordkeeping Requirements:
- (a) The owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:
    - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
    - (3) The annual capacity factor at which the owner or operator anticipated operating the affected facility based on all fuels fired and based on each individual fuel fired.
  - (g) The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day.
  - (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

[Note: Longer record keeping is required by condition 23 of section II of this permit.]  
[40 CFR 60.48c]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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The following specific conditions apply to the following emissions units after construction:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
003	Lumber drying kilns 1, 2 and 3

[Note: Emissions unit 003 is subject to regulation under Rule 62-212.400, F.A.C., for Prevention of Significant Deterioration; and is subject to the requirements of the state rules as indicated in this permit. The applicant has estimated the potential to emit of this emissions unit to be 319.5 tons per year of VOC and 4.2 tons per year of PM/PM<sub>10</sub>.]

**OPERATIONAL REQUIREMENTS**

10. Hours of Operation: These emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200, F.A.C., Definitions-potential to emit (PTE)]
11. Lumber Production Limitation: Lumber processed through this emissions unit (all kilns combined) shall not exceed 225 million board feet in any consecutive 12-month period. [Rules 62-210.200, F.A.C., Definitions-potential to emit (PTE)]

**EMISSION LIMITATIONS AND PERFORMANCE STANDARDS**

12. Visible Emissions Limited: Visible emissions from each kiln of this emissions unit shall not exceed 5% opacity. [Rule 62-212.400, F.A.C., and BACT]

**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

13. Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for this emissions unit annually using EPA Method 9, as described in 40 CFR 60 Appendix A (1997 version). Testing shall be conducted on at least one set of vents of each kiln of this emissions unit every time testing is required. [Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]

**REPORTING AND RECORD KEEPING REQUIREMENTS**

14. Records of Production Required: The owner or operator shall make and maintain the following records to demonstrate compliance with the production limitation of specific condition 11 of this section. Monthly records shall be completed no later than five days after the end of each month.
  - The amount of lumber processed through this emissions unit (all kilns combined) each month, in units of million board feet per month.
  - Rolling 12-month total lumber processed, in units of million board feet per consecutive 12-month period, calculated as the sum of lumber processed for the current month and the preceding eleven months.[Rule 62-4.070(3), F.A.C.]



**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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The following specific conditions apply to the following emissions units after construction:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
004	Planermill operations

[Note: Emissions unit 004 is subject to regulation under Rule 62-212.400, F.A.C., for Prevention of Significant Deterioration; and is subject to the requirements of the state rules as indicated in this permit. The applicant proposed emissions will not exceed 0.004 grains per dry standard cubic foot (dscf) at a nominal flow rate of 60,000 dscfm, which is equivalent to the limit of 2.1 pounds per hour. The conditions of this permit effectively limit combined annual emissions from this emissions unit to 9.0 tons per year of PM/PM<sub>10</sub>.]

**OPERATIONAL REQUIREMENTS**

15. Hours of Operation: These emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200, F.A.C., Definitions-potential to emit (PTE)]

**EMISSION LIMITATIONS AND PERFORMANCE STANDARDS**

16. Particulate Matter Emissions Limited: Emissions of particulate matter (PM) shall not exceed 2.1 pounds per hour. This emissions unit shall be equipped with a particulate capture and control system consisting of a local exhaust ventilation system ducted to a cyclone followed by a baghouse.. [Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]
17. Visible Emissions Limited: Visible emissions from each emissions unit shall not exceed 5% opacity. [Rule 62-212.400, F.A.C., and BACT]
18. Compliance with VE Limit in Lieu of Stack Test: After initial testing that demonstrates compliance with the PM limit of specific condition 16 of this section is completed, subsequent compliance testing for PM emissions from this emissions unit is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emissions standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version). [Rule 62-297.620(4), F.A.C., and applicant request]

**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

19. Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for this emissions unit annually using EPA Method 9, as described in 40 CFR 60 Appendix A (1997 version). Particulate matter (PM) testing, when required, shall be conducted using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version). [Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]

**AIR CONSTRUCTION PERMIT**  
**APPENDIX A. NSPS GENERAL PROVISIONS**

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[Note: The numbering of the original rules in the following conditions has been preserved for ease of reference to the rules. The term "Administrator" when used in 40 CFR 60 shall mean the Secretary or the Secretary's designee.]

1. Pursuant to 40 CFR 60.1 Applicability:

- (a) Except as provided in 40 CFR 60 subparts B and C, the provisions of this part apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.
- (b) Any new or revised standard of performance promulgated pursuant to section 111(b) of the Act shall apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of such new or revised standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.
- (c) In addition to complying with the provisions of this part, the owner or operator of an affected facility may be required to obtain an operating permit issued to stationary sources by an authorized State air pollution control agency or by the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Title V of the Clean Air Act (CAA) as amended November 15, 1990 (42 U.S.C. 7661).

[40 CFR 60.1]

2. Pursuant to 40 CFR 60.7 Notification And Record Keeping:

- (a) Any owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:
  - (1) A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
  - (2) A notification of the anticipated date of initial startup of an affected facility postmarked not more than 60 days nor less than 30 days prior to such date.
  - (3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
  - (4) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
- (b) The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

**AIR CONSTRUCTION PERMIT**  
**APPENDIX A. NSPS GENERAL PROVISIONS**

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- (f) The owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least three years following the date of such measurements, maintenance, reports, and records.
- (g) If notification substantially similar to that in 40 CFR 60.7(a) is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of 40 CFR 60.7(a).
- (h) Individual subparts of this part may include specific provisions which clarify or make inapplicable the provisions set forth in this section.  
[40 CFR 60.7]

3. Pursuant to 40 CFR 60.11 Compliance With Standards And Maintenance Requirements:

- (d) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- (g) For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 CFR 60, nothing in 40 CFR 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.  
[40 CFR 60.11]

4. Pursuant to 40 CFR 60.12 Circumvention:

No owner or operator subject to the provisions of 40 CFR 60.12 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.  
[40 CFR 60.12]

5. Pursuant to 40 CFR 60.14 Modification:

- (a) Except as provided under 40 CFR 60.14(e) and 40 CFR 60.14(f), any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.

## AIR CONSTRUCTION PERMIT

### APPENDIX A. NSPS GENERAL PROVISIONS

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- (b) Emission rate shall be expressed as kg/hr (lbs./hour) of any pollutant discharged into the atmosphere for which a standard is applicable. The Administrator shall use the following to determine emission rate:
- (1) Emission factors as specified in the latest issue of "Compilation of Air Pollutant Emission Factors", EPA Publication No. AP-42, or other emission factors determined by the Administrator to be superior to AP-42 emission factors, in cases where utilization of emission factors demonstrate that the emission level resulting from the physical or operational change will either clearly increase or clearly not increase.
  - (2) Material balances, continuous monitor data, or manual emission tests in cases where utilization of emission factors as referenced in 40 CFR 60.14(b)(1) does not demonstrate to the Administrator's satisfaction whether the emission level resulting from the physical or operational change will either clearly increase or clearly not increase, or where an owner or operator demonstrates to the Administrator's satisfaction that there are reasonable grounds to dispute the result obtained by the Administrator utilizing emission factors as referenced in 40 CFR 60.14(b)(1). When the emission rate is based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 appendix C of 40 CFR 60 shall be used to determine whether an increase in emission rate has occurred. Tests shall be conducted under such conditions as the Administrator shall specify to the owner or operator based on representative performance of the facility. At least three valid test runs must be conducted before and at least three after the physical or operational change. All operating parameters which may affect emissions must be held constant to the maximum feasible degree for all test runs.
- (c) The addition of an affected facility to a stationary source as an expansion to that source or as a replacement for an existing facility shall not by itself bring within the applicability of this part any other facility within that source.
- (d) [Reserved]
- (e) The following shall not, by themselves, be considered modifications under this part:
- (1) Maintenance, repair, and replacement which the Administrator determines to be routine for a source category, subject to the provisions of 40 CFR 60.14(c) and 40 CFR 60.15.
  - (2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility.
  - (3) An increase in the hours of operation.
  - (4) Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type, as provided by 40 CFR 60.1, the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications as amended prior to the change. Conversion to coal required for energy considerations, as specified in section 111(a)(8) of the Act, shall not be considered a modification.
  - (5) The addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or is replaced by a system which the Administrator determines to be less environmentally beneficial.
  - (6) The relocation or change in ownership of an existing facility.
  - (f) Special provisions set forth under an applicable subpart of this part shall supersede any conflicting provisions of this section.

**AIR CONSTRUCTION PERMIT**  
**APPENDIX A. NSPS GENERAL PROVISIONS**

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- (g) Within 180 days of the completion of any physical or operational change subject to the control measures specified in 40 CFR 60.14(a), compliance with all applicable standards must be achieved.
- (h) No physical change, or change in the method of operation, at an existing electric utility steam generating unit shall be treated as a modification for purposes of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the five years prior to the change.

[40 CFR 60.14]

6. Pursuant to 40 CFR 60.19 General notification and reporting requirements:

- (a) For the purposes of 40 CFR 60, time periods specified in days shall be measured in calendar days, even if the word "calendar" is absent, unless otherwise specified in an applicable requirement.
- (b) For the purposes of 40 CFR 60, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, report, or other written communication to the Administrator, the owner or operator shall postmark the submittal on or before the number of days specified in the applicable requirement. For example, if a notification must be submitted 15 days before a particular event is scheduled to take place, the notification shall be postmarked on or before 15 days preceding the event; likewise, if a notification must be submitted 15 days after a particular event takes place, the notification shall be delivered or postmarked on or before 15 days following the end of the event. The use of reliable non-Government mail carriers that provide indications of verifiable delivery of information required to be submitted to the Administrator, similar to the postmark provided by the U.S. Postal Service, or alternative means of delivery agreed to by the permitting authority, is acceptable.
- (c) Notwithstanding time periods or postmark deadlines specified in 40 CFR 60 for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.
- (d) If an owner or operator of an affected facility in a State with delegated authority is required to submit periodic reports under 40 CFR 60 to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such facility under 40 CFR 60, the owner or operator may change the dates by which periodic reports under 40 CFR 60 shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. The allowance in the previous sentence applies in each State beginning 1 year after the affected facility is required to be in compliance with the applicable subpart in 40 CFR 60. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.
- (f)(1)(i) Until an adjustment of a time period or postmark deadline has been approved by the Administrator under paragraphs (f)(2) and (f)(3) of this section, the owner or operator of an affected facility remains strictly subject to the requirements of 40 CFR 60.

**AIR CONSTRUCTION PERMIT**  
**APPENDIX A. NSPS GENERAL PROVISIONS**

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- (ii) An owner or operator shall request the adjustment provided for in paragraphs (f)(2) and (f)(3) of this section each time he or she wishes to change an applicable time period or postmark deadline specified in 40 CFR 60.
  - (2) Notwithstanding time periods or postmark deadlines specified in 40 CFR 60 for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. An owner or operator who wishes to request a change in a time period or postmark deadline for a particular requirement shall request the adjustment in writing as soon as practicable before the subject activity is required to take place. The owner or operator shall include in the request whatever information he or she considers useful to convince the Administrator that an adjustment is warranted.
  - (3) If, in the Administrator's judgment, an owner or operator's request for an adjustment to a particular time period or postmark deadline is warranted, the Administrator will approve the adjustment. The Administrator will notify the owner or operator in writing of approval or disapproval of the request for an adjustment within 15 calendar days of receiving sufficient information to evaluate the request.
  - (4) If the Administrator is unable to meet a specified deadline, he or she will notify the owner or operator of any significant delay and inform the owner or operator of the amended schedule.
- [40 CFR 60.19]

**AIR CONSTRUCTION PERMIT**  
**APPENDIX B. BACT DETERMINATION**

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The BACT Determination is attached as part of this permit following this page.

**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

**Champion International Corporation  
McDavid Sawmill  
PSD-FL-271 and 0330260-001-AC  
Escambia County**

**1. BACKGROUND**

The applicant proposes to construct a new sawmill at a new site at US Highway 29, Pine Barren, Escambia County, approximately 19 miles north of Pensacola.

The facility will consist of lumber sawmill with a capacity to produce up to 225 million board feet per year (mmBF/yr) of lumber. The mill will have two natural gas fired boilers that will provide steam to three lumber drying kilns, a planer mill to plane and trim dried lumber, and fugitive emissions.

This project addresses the following emissions unit(s):

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Natural gas fired boiler number 1
002	Natural gas fired boiler number 2
003	Lumber drying kilns 1, 2 and 3
004	Planer mill
005	Fugitive PM emissions

The applicant proposes to construct this new lumber sawmill consisting of the above emissions units.

The emissions units and fugitive sources are subject to limits determined as BACT for VOC, particulate matter, and visible emissions. The boilers are subject to regulation under the New Source Performance Standards: 40 CFR 60 Subpart A, General Provisions, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. However, this regulation only requires record keeping and reporting for natural gas fired boilers. The boilers are also subject to regulation under Rule 62-296.406, F.A.C., for fossil fuel steam generators less than 250 mmBtu/hr, which requires a determination of BACT for sulfur dioxide and particulate matter emissions. The visible emissions provisions of this rule are less stringent than the limit determined as BACT for the boilers.

Emissions from the boilers will be controlled by good combustion of natural gas using low NOx burners. Emissions from the kilns are not subject to control, other than proper operation. Emissions from the planer mill will be controlled by a local exhaust collection system ducted to a cyclone/baghouse combination. Fugitive PM emissions will be controlled by reasonable precautions to prevent unconfined particulate emissions. Emission control is discussed in more detail in the TEPD.

The emissions associated with this project are summarized below, in units of tons per year. The facility will be PSD major because of VOC and PSD significant for PM and PM<sub>10</sub>.

Pollutant	Point Source Emissions	Quantifiable Fugitive Emissions	Total	PSD Major Threshold	PSD Significance Levels <sup>1</sup>	Subject to PSD Review?
VOC	326.0		326.0	250	--	Yes
PM	14.6	17.6	32.2	--	25	Yes
PM <sub>10</sub>	14.6	3.8	18.4	--	15	Yes
SO <sub>2</sub>	0.3		0.3	--	40	No
NO <sub>x</sub>	39.0		39.0	--	40	No
CO	70.2		70.2	--	100	No

<sup>1</sup> Florida Administrative Code 212.400-2.



## **BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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This facility is classified as a Major or Title V Source of air pollution because emissions of volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for VOC, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

The applicant stated that this facility is not a major source of hazardous air pollutants (HAPs).

The project's process information, air quality effects, and rule applicability are discussed in more detail in the Technical Evaluation and Preliminary Determination (TEPD) dated July 30, 1999.

### **2. DATE OF RECEIPT OF A BACT APPLICATION**

June 15, 1999, and updated by additional information as shown in the TEPD.

### **3. BACT DETERMINATION REQUESTED BY THE APPLICANT**

The applicant proposed BACT for the PSD pollutants particulate matter and VOC. BACT was proposed to be control equipment for PM emissions from the planer mill, good combustion and operation for PM emissions from the boilers and lumber drying kilns, and reasonable precautions to prevent unconfined PM emissions from the fugitive sources. The applicant proposed a limit of 5% opacity for visible emissions from the point sources. The applicant demonstrated that no controls are feasible for the VOC emissions from the lumber drying kilns.

### **4. REVIEWER**

Joseph Kahn, P.E., prepared BACT determination

### **5. BACT DETERMINATION PROCEDURE**

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques for control of each such pollutant. In addition, Rule 62-212.400(6)(a), F.A.C., states that in making the BACT determination, the Department shall give consideration to:

1. Any Environmental Protection Agency determination of BACT pursuant to Section 169 of the Clean Air Act, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
2. All scientific, engineering, and technical material and other information available to the Department.
3. The emission limiting standards or BACT determination of any other state.
4. The social and economic impact of the application of such technology.

The EPA currently directs that BACT should be determined using the "top-down" approach. In this approach, available control technologies are ranked in order of control effectiveness for the emissions unit under review. The most stringent alternative is evaluated first. That alternative is selected as BACT unless the alternative is found to not be achievable based on technical considerations or energy, environmental or economic impacts. If this alternative is eliminated for these reasons, the next most stringent alternative is considered. This top-down approach is continued until BACT is determined. In general EPA has identified five key steps in the top-down BACT process: Identify alternative control technologies; eliminate technically infeasible options; rank remaining control technologies by control effectiveness; evaluate most effective controls; select BACT.

BACT evaluation should be performed for each emissions source and pollutant under consideration. BACT for particulate matter can be treated separately for the boilers, lumber drying kilns, planer mill and

## BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

the fugitive sources. VOC emissions result from the lumber drying kilns and, to a much lesser extent, from the boilers.

The Department will consider the control or reduction of "non-regulated" air pollutants when determining the BACT limit for regulated pollutants, and will weigh control of non-regulated air pollutants favorably when considering control technologies for regulated pollutants. The Department will also favorably consider control technologies that utilize pollution prevention strategies. These approaches are consistent with EPA's consideration of environmental impacts.

The EPA has determined that a BACT determination shall not result in a selection of a control technology which would not meet any applicable emission limitation under 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants). There are no such limits applicable to this project.

In addition to the information submitted by the applicant and that information mentioned above, the Department may rely upon other available information in making its BACT determination. For this project, the Department also relied upon information from recent BACT proposals made for similar facilities in Texas (Champion, Camden, TX) and North Carolina (International Paper, Riegelwood, NC) provided by the applicant to the Department on April 23, 1999. For each emission source, the Department's BACT determination is based on the information provided by the applicant and the informed judgement of the Department.

### 6. BACT ANALYSIS AND DEPARTMENT'S DETERMINATION

For this project the PSD pollutants of concern are PM, PM<sub>10</sub> and VOC. The applicant proposed control strategies for these pollutants for the emission sources at this facility. The applicant's proposal and the Department's BACT for each pollutant and source is discussed below.

#### 6.1 BOILERS

In accordance with Rule 62-296.406, F.A.C., a BACT determination is required for boilers with a heat input of less than 250 mmBtu/hour for the pollutants PM and SO<sub>2</sub>. Both of the boilers for this project are subject to this requirement. The BACT determination discussed below includes a determination for the boilers for PM and SO<sub>2</sub> per Rule 62-296.406, F.A.C., and PM/PM<sub>10</sub> and VOC per Rule 62-212.400.

Particulate matter and VOC are pollutants formed in a boiler by the incomplete combustion of fuels fired in the boiler. When insufficient oxygen is provided or poor combustion conditions occur, incomplete combustion occurs and emissions of particulate matter and VOC are increased. Visible emissions will result from incomplete combustion, primarily as a result of particulate emissions. Sulfur dioxide is formed from the oxidation of sulfur present in the fuels fired. Control for PM, VE and VOC is generally good combustion of fuel, with an appropriate level of excess air to ensure complete combustion. Sulfur dioxide emissions in small boilers is generally reduced by reducing the sulfur in the fuel fired, a pollution prevention strategy.

The applicant proposed BACT per Rules 62-296.406 and 62-212.400, F.A.C., to be the use of only pipeline natural gas and good combustion practices. The applicant has also proposed a visible emissions limit of 5% opacity as BACT per Rule 62-212.400, F.A.C. Natural gas is a fuel that is easily burned and is low in sulfur. Good combustion of natural gas results in low emissions of PM/PM<sub>10</sub>, VOC and SO<sub>2</sub>. The use of only natural gas with good combustion will result in estimated maximum emissions of 1.4 tons per year of PM/PM<sub>10</sub>, 0.3 tons per year of SO<sub>2</sub>, and 6.5 tons per year of VOC. The applicant proposed that the use of natural gas is the top control technology for these boilers. A review of the RACT/BACT/LAER Clearinghouse (RBLCL) data shows that BACT is the use of natural gas in many cases.

## BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The Department agrees with the applicant's proposed BACT. The Department believes that setting numerical mass emission limits for PM/PM<sub>10</sub>, SO<sub>2</sub>, and VOC is not warranted given the low potential emissions of these pollutants. Instead, the fuel will be limited to pipeline natural gas. This will also meet the BACT requirements of Rule 62-296.406, F.A.C., for PM and SO<sub>2</sub>. Thus, BACT shall be the use of pipeline natural gas and a VE limit of 5% opacity applicable at all times including startup and shutdown. This VE limit is more stringent than that provided by Rule 62-296.406, F.A.C., but is imposed per Rule 62-212.400, F.A.C.

### 6.2 LUMBER DRYING KILNS

A BACT determination is required for the three lumber drying kilns for VOC and PM/PM<sub>10</sub> per Rule 62-212.400.

VOC emissions result from naturally occurring hydrocarbons present in the wood that are evaporated during the lumber drying operation. Particulate matter that is emitted is a combination of condensable hydrocarbons and dust (primarily sawdust) on lumber surfaces. There are presently no control systems in use for VOC and particulate matter for these types of drying kilns.

The applicant proposed that no controls are feasible for VOC emissions from these sources, and that proper operating practices and a visible emissions limit of 5% opacity are BACT for PM/PM<sub>10</sub> per Rule 62-212.400, F.A.C.

#### VOC Controls

The applicant evaluated exhaust control technologies – regenerative thermal oxidation, regenerative catalytic oxidation, biofiltration – to control VOC emissions. Pollution prevention and process changes are not technically feasible because the hydrocarbons, which are inherent in the wood, are emitted as a consequence of the lumber drying cycle. The applicant suggested that exhaust controls are not technically feasible because of the difficulty designing and implementing a capture device which will accommodate the cyclical nature of the airflow through the kiln vents. The applicant noted that no such capture system is in use on these type of kilns. Regardless of this technical challenge, the applicant estimated control costs associated with the use of thermal and catalytic oxidation for VOC control. Costs are summarized below, assuming the use of one oxidizer for each kiln. The applicant concluded that the costs are prohibitive and make these controls economically infeasible.

Option	Capital Cost	Annual Operating Cost	Life	Interest	Control Cost
RTO	\$5.81 million	\$2.15 million	10 yrs	8 %	\$8,351/ton
RCO	\$5.76 million	\$1.82 million	10 yrs	8 %	\$7,051/ton

In addition to the technical challenge of capturing emissions, the applicant rejected biofiltration as infeasible because of the challenge of ducting emissions to biofilters and conditioning the exhaust, the difficulty researching and designing a biofiltration system with proper microorganisms and media to degrade the hydrocarbons, and concerns over media plugging from condensable hydrocarbons. The applicant was unable to document the use of biofiltration for these or similar sources in commercial operation.

The Department agrees with the applicant's assessment. The Department's review of the RBLC data shows that similar lumber drying kilns listed have no controls for VOC emissions, and are listed as "no controls feasible". Based on the information provided by the applicant and the informed judgement of the Department, control of VOC emissions is not feasible. BACT for this project for VOC shall be no emission controls. Lumber throughput shall be limited by permit condition to 225 million board feet per year, as proposed by the applicant, to limit potential VOC emissions to approximately 320 tons per year. The estimate of potential emissions is discussed in more detail in the TEPD.

## BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

### PM Controls

Potential emissions of particulate matter were estimated by the applicant to be 4.2 tons per year. The applicant proposed BACT for PM/PM<sub>10</sub> to be proper operation and maintenance of the kilns, with no exhaust controls feasible because of the technical difficulties discussed above. The applicant proposed a limit for visible emissions of 5% opacity.

The Department agrees with the applicant's BACT proposal. Verifying PM emissions by source testing would be difficult, if not infeasible, so the Department will not impose a numerical limit for PM/PM<sub>10</sub> emissions. BACT for the lumber drying kilns shall be a limit for visible emissions of 5% opacity applicable at all times including startup and shutdown.

### 6.3 PLANERMILL

A BACT determination is required for the planer mill for PM/PM<sub>10</sub> per Rule 62-212.400. The applicant proposed BACT for the planer mill to be collection of particulate matter using a local exhaust ventilation system and control with a cyclone that exhausts to a baghouse (fabric filter). The applicant estimated that emissions from this control system will be 0.004 grains per dscf. The applicant suggested that this combination of controls is the top control strategy for particulate matter for this source. The applicant also proposed a VE limit of 5% opacity.

The Department agrees with the applicant's proposed BACT. BACT shall be the use of a local exhaust collection system exhausting to a cyclone followed by a baghouse. The limit for PM/PM<sub>10</sub> emissions shall be 2.1 pounds per hour. Visible emissions shall be limited to 5% opacity at all times including startup and shutdown.

### 6.4 FUGITIVE PM SOURCES

A BACT determination is required for the fugitive sources of particulate matter for the pollutants PM/PM<sub>10</sub> per Rule 62-212.400. The applicant proposed to use reasonable precautions to control unconfined emissions of particulate matter. The Department agrees with the proposed BACT, so BACT shall be the use of reasonable precautions to prevent unconfined emissions of particulate matter. These precautions shall be specified in the facility-wide requirements of the permit.

### 6.5 SUMMARY OF BACT DETERMINATION

Emissions Unit	Emission Source	Pollutant(s)	BACT
001	Natural gas fired boiler number 1	PM/PM <sub>10</sub> & VOC VE	Use of only pipeline natural gas 5% opacity at all times
002	Natural gas fired boiler number 2	PM/PM <sub>10</sub> & VOC VE	Use of only pipeline natural gas 5% opacity at all times
003	Lumber drying kilns 1, 2 and 3	PM/PM <sub>10</sub> & VOC VE	No controls feasible 5% opacity at all times
004	Planer mill	PM/PM <sub>10</sub> VE	Local exhaust, cyclone, baghouse - 2.1 lb/hr 5% opacity at all times
005	Fugitive PM emissions	PM/PM <sub>10</sub>	Reasonable precautions to prevent emissions of unconfined particulate matter

**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

**7. COMPLIANCE**

The compliance methods are briefly summarized here. Compliance with the visible emission limitations for the point sources shall be demonstrated on an annual basis by testing using EPA Method 9. Emission testing shall be required for the boilers for NO<sub>x</sub> and CO initially and upon renewal of each operation permit. Emission testing for the planer mill control device outlet for particulate matter shall not be required because an alternative limitation of 5% opacity will be specified in lieu of PM testing.

**8. DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:**

Joseph Kahn, P.E.  
Department of Environmental Protection  
Bureau of Air Regulation  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Prepared July 30, 1999

Recommended By:

Approved By:



\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation



\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources Management

9/9/99

Date: \_\_\_\_\_

9/9/99

Date: \_\_\_\_\_

**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]**

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- G.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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.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.
- G.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.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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.
- G.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 and 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.
- G.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.

**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]**

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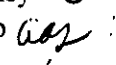
The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.


- G.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.
- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X);
  - (b) Determination of Prevention of Significant Deterioration (X); and
  - (c) Compliance with New Source Performance Standards (X).
- G.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 or 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:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.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.

Florida Department of  
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy   
Al Linero 

FROM: Joe Kahn 

DATE: September 7, 1999

SUBJECT: Champion International Corporation  
McDavid Sawmill

Attached for approval and signature is the final permit package for the proposed McDavid Sawmill for Champion International Corporation to be located in Escambia County. This project includes two natural gas fired boilers that will provide steam to three lumber drying kilns, a planermill to plane and trim dried lumber, and fugitive emissions. The sawmill will have a capacity to produce up to 225 million board feet per year of lumber.

Total potential emissions from the project in tons per year, including quantifiable fugitive PM emissions, are estimated to be 326 of VOC, 32.2 of PM, 18.4 of PM<sub>10</sub>, 0.3 of SO<sub>2</sub>, 39.0 of NO<sub>x</sub>, and 70.2 of CO.

The Public Notice requirements have been met on August 5, 1999 by publishing in the Pensacola News Journal.

I recommend your approval and signature.

Day 90 is November 19, 1999.

Attachments

/jk