International Paper Company
McDavid, Florida

RTP
Environmental Associates, Inc.

Air Construction Permit Application for Modifications to the McDavid Lumber Mill

RTP Environmental Associates
May 2005

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1.0 INTRODUCTION

1.1 Application Summary

International Paper proposes to modify its current permit for the McDavid Lumber Mill located approximately 25 miles north of Pensacola, in Escambia County, Florida.

The proposed permit modification is needed to authorize increased emissions from a recent project which increased the efficiency of specific equipment within the sawmill and reduced the downtime that had been associated with some existing equipment.

1.2 Application Objectives

International Paper's main objective is to obtain authorization to increase lumber production at the mill to an annual kiln-dried production rate of 250 million board feet. This request to obtain authorization for this higher production level is needed to allow increased production from a recently permitted project which approved the following changes to the mill.

1. Replacing the North Chain Unscrambler with a new 6 Stage Log Singulator.

2. Replacing the pantograph arms, modifying the out feed rolls on the curve sawing gang saws and installing 2 vibrating conveyers.

3. Reducing equipment downtime such that annual production rate could continue to increase toward the originally permitted level of 225 million board feet per year.

1.3 Report Organization

International Paper's permit application has been subdivided into several sections:

- Chapter 2.0 contains relevant project information, including the site location as well as a permitting and operating history for the McDavid Mill;

- Chapter 3.0 gives the equipment emissions inventory data, including information on allowable emissions and the potential-to-emit for sources that are addressed by this permit application;

- Chapter 4.0 contains the regulatory analysis, which includes applicable regulations and classification of ambient air quality. This section also discusses the net emissions increases associated with what is requested in this application and defines the PSD applicability for each pollutant;

- Chapter 5.0 contains a summary of applicable rules and demonstrates source compliance with each rule; and

- Technical references cited in the application are listed in Chapter 6.0.

The application also contains several technical appendices, which provide additional details, such as specific calculations and information associated with the equipment that is being proposed for this project. FDEP permit forms are provided in Appendix A.

2.0 PROJECT DESCRIPTION

2.1 Project Location

International Paper's McDavid Lumber Mill is located approximately 25 miles north of Pensacola, in Escambia County, Florida. The UTM coordinates for the facility are 3406.5 kmN and 468.74 kmE. A plot plan of the facility is included as Figure 2-1.

2.2 Existing Facility

The primary activity at International Paper's McDavid Lumber Mill is the conversion of southern yellow pine logs into lumber (Standard Industrial Classification [SIC] code 2421). The primary sources at the mill include two natural gas fired boilers, three lumber drying kilns and a planer mill operation. A process flow diagram of the facility is included as Figure 2-2.

2.3 Proposed Facility Modifications

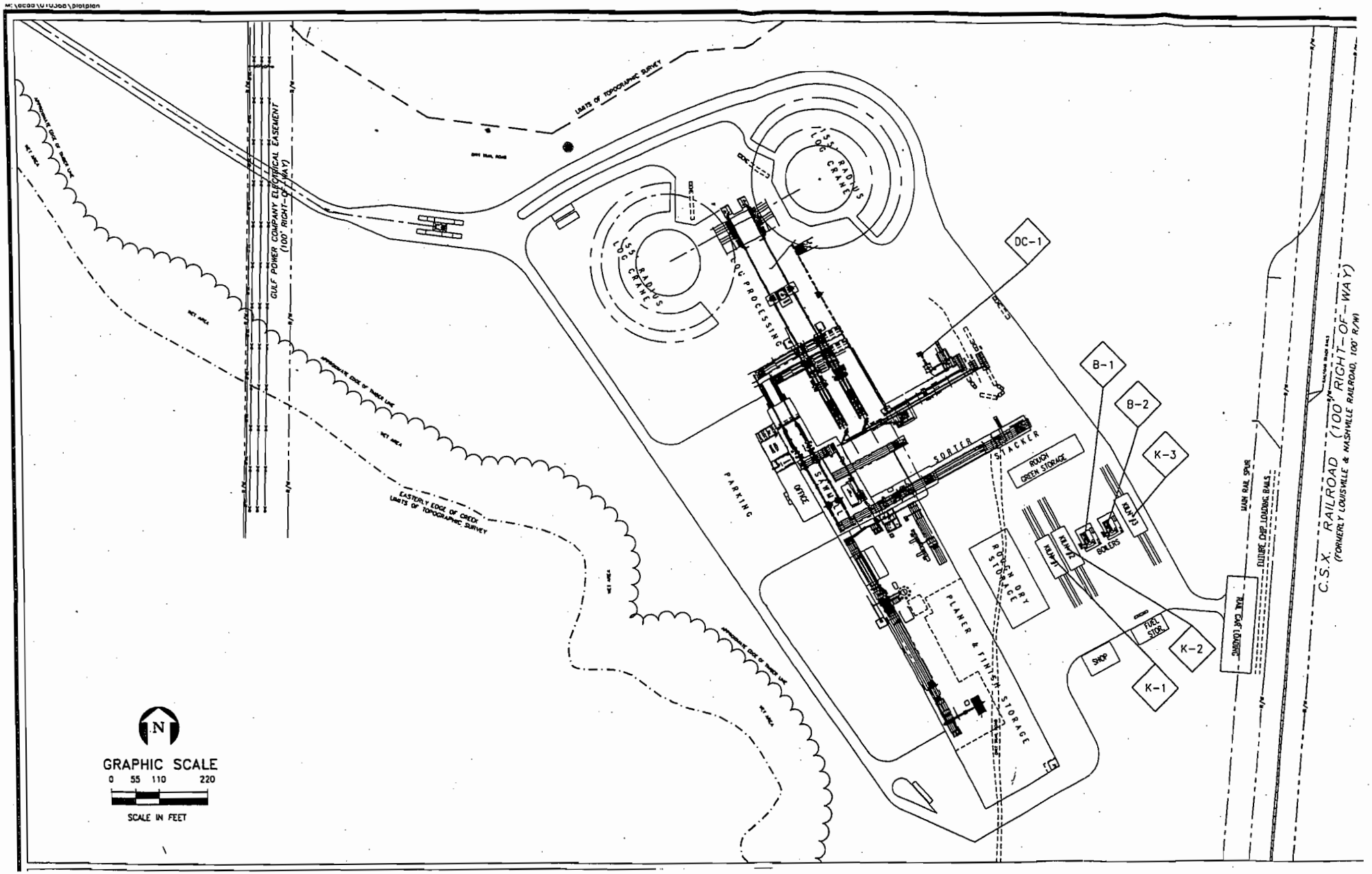
There are no physical changes that are proposed to International Paper's McDavid Lumber Mill. This request to modify the existing permit is associated with recent changes that were made to equipment on the sawmill side (portion of mill that is producing green lumber from logs) of the mill. These changes were made to enable the mill to operate more efficiently using equipment that is common to other lumber mills owned and operated by International Paper. It was decided that these changes were necessary since the mill as originally constructed was owned and operated by Champion International Corporation, which designed the mill to include equipment that is not consistent with the design of mills owned and operated by International Paper. The equipment changes made at the mill included.

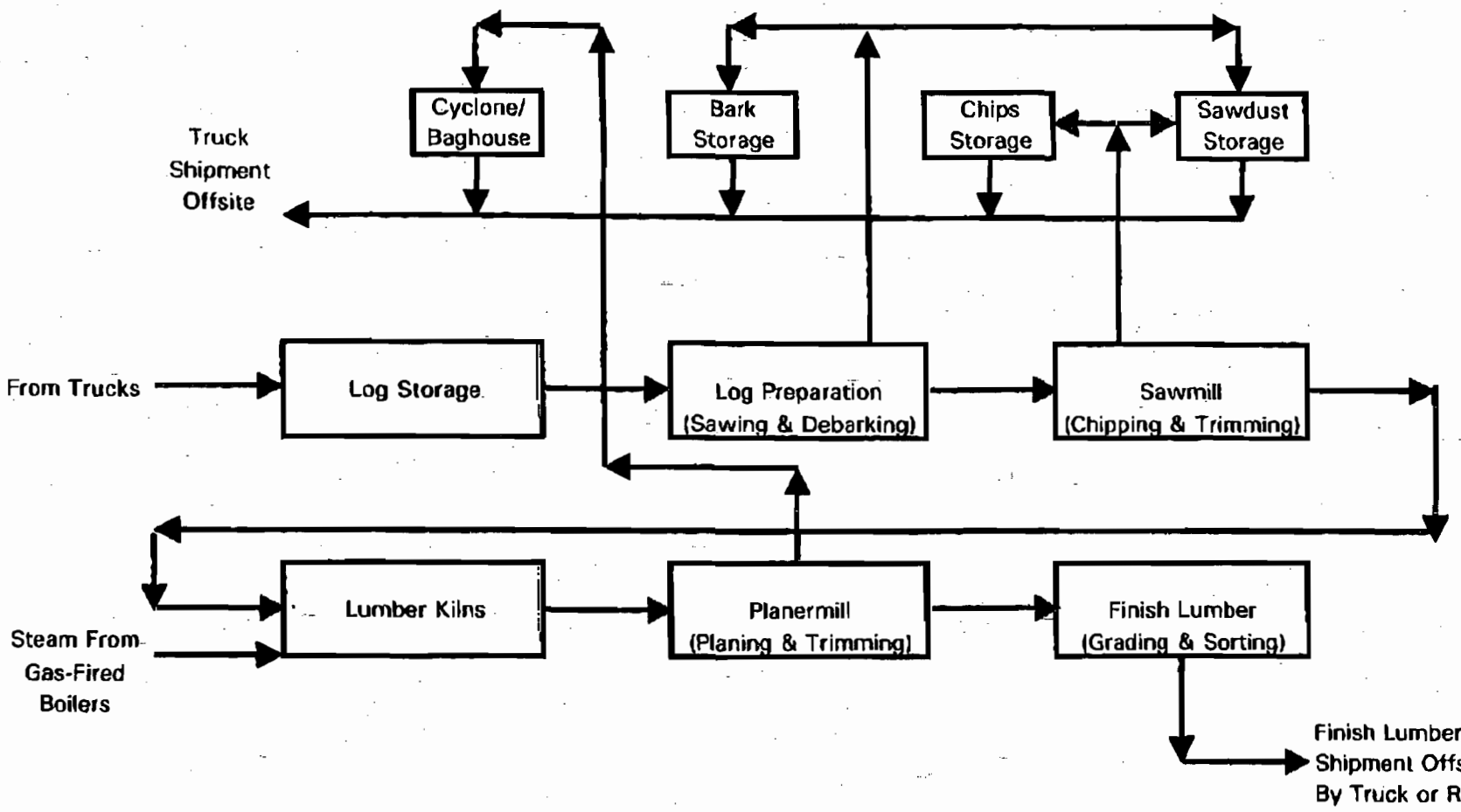
- Replacing the North Chain Unscrambler with a new 6 Stage Log Singulator.

- Replacing the pantograph arms, modifying the out feed rolls on the curve sawing gang saws and installing 2 vibrating conveyers.

The equipment changes described above have enabled the mill to operate more efficiently by reducing the amount of equipment downtime that has plagued the existing equipment. By reducing the amount of equipment downtime the mill has been able to very close to the original design production level of 225 million board feet per year. This rate of 225 million board feet per year was the level at which the mill was permitted to operate when the construction/PSD permit was issued to Champion International Corporation on September 10, 1999.

As a result of the production improvements that have been made to the mill, the production level is not only approaching the permitted 225 million board feet per year level, but has the potential to exceed the permitted level if monthly production rates continue at present levels. As this is the case, it has become necessary to obtain authorization for an increase in the annual production rate.


LIMITS OF TOPOGRAPHIC SURVEY
GULF POWER COMPANY ELECTRICAL EASEMENT (100' RIGHT-OF-WAY)
APPROXIMATE EDGE OF MARSH LINE
WETLANDS
EASTERLY EDGE OF CREEK
LIMITS OF TOPOGRAPHIC SURVEY
150' RADIUS CRANE
150' RADIUS CRANE
DC-1
LOG PROCESSING
SORTER
STACKER
STANDBY
OFFICE
PARKING
ROUGH GREEN STORAGE
ROUGH DRY STORAGE
PLANER & FINISH STORAGE
KILNS
BOILERS
B-1
B-2
K-3
K-2
K-1
FUEL STOR.
SHOP
MAIN RAIL SPUR
FUTURE CHIP LOADING RAILS
RAIL CAR LOADING
C.S.X. RAILROAD (100' RIGHT-OF-WAY)
(FORMERLY LOUISVILLE & NASHVILLE RAILROAD, 100' R/W)
N
GRAPHIC SCALE
0 55 110 220
SCALE IN FEET



PROCESS FLOW DIAGRAM

Source: ECT, 1999.

ECT
Environmental Consulting & Technology, Inc.

2.4 Background Information Prompting Request for Modification

The McDavid lumber mill as designed by Champion International Corporation utilized equipment that needed numerous repairs, resulting in loss of production. For example, the existing North Chain Unscrambler was not able to supply the mill with logs at a constant rate due to frequent repairs. This situation was alleviated by replacing the North Chain Unscrambler with a new 6 Stage Log Singulator, the same equipment that is used by other mills owned and operated by International Paper. Experience has demonstrated that the 6 Stage Log Singulator allows the mill to have a constant log gap, which allows the equipment to operate at its design capacity.

The other part of the sawmill design that was evaluated and modified is associated with the existing Curve Saw. The pantograph arm assembly was the original one that came with the curve sawing gangs. The original pantograph arm assembly was made of tubular steel with the drive belts enclosed in the tubing. The design was not desirable since it was necessary to dismantle the entire assembly when the belts broke and had to be replaced.

By switching to an updated pantograph system as is common to other International Paper lumber mills, the belts are no longer enclosed in a tubular frame and are instead exposed for easier and less time consuming replacement. Other changes included the installation of shifting out feed rolls and vibrating conveyors. This has enabled the mill to increase the hours of operation since the existing out feed rolls were fixed, producing shims that caused cross ups and downtime at the out feed of the gang. The conversion to shifting out feed rolls is a proven technology for removal of shims on the out feed rolls.

It is the production improvements that have been completed at the mill that has resulted in a need to request an increase in the permit allowable production rate of kiln-dried lumber. Presently the production rate has not exceeded the permitted level of 225 million board feet per year based on a 12-month rolling average. However, there is concern that if production rates continue at present levels that the mill could potentially exceed the 225 million board foot level by the end of 2005. Therefore it is necessary to request an increase in the permitted level at this time. International Paper has determined that the maximum level of production that could be achieved by the mill without additional equipment modifications would be approximately 250 million board feet per year of kiln-dried lumber.

3.0 EMISSIONS INVENTORY

3.1 Current Emissions

3.1.1 Allowable Emissions

The operations at International Paper's McDavid Lumber Mill are authorized by Major Source Operating Permit No. 0330260-003-AV which was issued to the facility on March 10, 2002. A review of the operating permit indicates that emissions limitations were imposed on the natural gas fired boilers and the Planermill operations.

The operating permit does not impose any emissions limitations on the three lumber drying kilns. The permit does however state that lumber processed through the kilns (all kilns combined) shall not exceed 225 million board feet in any consecutive 12-month period. Though not included as an emissions limit, the permit does state that the applicant has estimated the potential to emit from the three kilns combined to be 319.5 tons per year of VOC and 4.2 tons per year of PM/PM_{10}. This level of emissions exceeded the PSD regulation threshold of 250 tons per year and required the facility to undergo PSD review when the original construction permit application was prepared and submitted by Champion International Corporation.

3.2 Project Emissions Changes

The recent equipment changes that have been made at International Paper's McDavid Lumber Mill resulted in production increases solely due to reducing equipment downtime. Initially it was expected that although the equipment changes would improve lumber production rates, the maximum kiln-dried production level would remain below the original design and permitted rate of 225 million board feet per year. Now that the mill has had some time to operate with the recent changes it has now become apparent that the mill could exceed the 225 board feet per year limit. In fact, International Paper has noticed continued improvement in the mill since taking it over approximately four years ago.

Since taking over ownership and operation of the mill in 2001, International Paper has identified several pieces of equipment which have required frequent repairs resulting in substantial downtime. This downtime has made it difficult to operate at the level the mill was designed and permitted. Generally, International Paper has experienced an ongoing process of identifying and fixing problems with the original mill design. This is illustrated by the mills production records which indicate a large increase in the production level after the first year of operation, then steady increases in production from that time to the present. This gradual increase in the production level is shown as follows in Table 3-1 which provides production from the time of beginning operation in January 2001 to the end of 2004.

Table 3-1
Actual Lumber Production (Kiln-Dried)

Production Year	Production Level (Million Board Feet)
2001	88
2002	154
2003	173
2004	203

3.2.1 Lumber Drying Kilns

It is being requested that the McDavid mill be allowed to dry 250 million board feet per lumber in the existing kilns at the mill on a 12-month rolling average. In accordance with the PSD program since the McDavid mill is currently a major source, this request to operate above the current permit limit will be considered a modification, making it necessary to compare the most recent two year actual emissions to the future potential to emit.

Given the fact that the mill was subject to PSD review in 1999 and has continued to ramp-up production to what would be considered to represent normal operation (i.e., 225 million board feet per year), the PSD rules contain provisions to allow the federally enforceable permit limits to represent actual emissions. These provisions of the PSD regulations were addressed in a letter dated April 23, 2004 from Dearl Hilyer (International Paper) to Kevin White (FDEP). A copy of this letter has been included with this application (see Appendix D).

The future potential to emit from the kilns has been based on drying lumber at the proposed future capacity of 250,000 MBF per year.

The calculation of actual and future potential emissions from the kilns has been based on emissions factors that were included in the original PSD permit application dated June 1999 and the Title V application dated June 2001. Specifically, the emissions of VOC have been calculated using a factor of 2.84 lb/MBF and the emissions of PM/PM_{10} have been calculated using a factor of 0.037 lb/MBF. Using the approach outlined above the actual emissions from the lumber drying kilns and the potential to emit operating at the future maximum production rate of 250 million board feet per year has been summarized in Table 3-2 as follows:

TABLE 3-2

Summary of Actual and Future Potential Emissions from Dry Kilns (TPY)

Emissions		PM	SO_2	NO_X	CO	VOC
Avg. Actual		4.2	-	-	-	319.5
Future Potential		4.6	-	-	-	355.0
	Change	0.4	-	-	-	35.5

Notes: The actual emissions of PM and VOC based on using the original PSD application and Title V permit application emissions factors of 0.037 lb/MBF for PM and 2.84 lb/MBF for VOC and the permitted kiln-dried production rate of 225,000 MBF per year. All potential emissions based on using the same PM and VOC emission factors and the proposed production rate of 250,000 MBF per year.

3.2.2 Other Equipment

The only other point sources of air emissions that have not been addressed are the existing natural gas fired boilers that provide steam to the lumber drying kilns and the cyclone/baghouse that controls the emissions from the planermill operations. There are also several activities related to the handling of logs and the sawing operations that result in fugitive emissions. However, the emissions of fugitives do not need to be included in determining the proposed project's potential to emit. This is because forest products facilities are not included on the list of sources that are required to consider fugitive emissions in accordance with the PSD regulations. Also, PSD regulations exempt modifications from the substantive requirements of PSD review if the fugitive emissions are what cause the source or modification to become major and the source is not a listed source category [40 CFR 52.21(i)(4)(vii)].

There are no physical changes proposed for the natural gas fired boilers. They will continue to operate at the same levels that they have been and will continue to comply with the operating limitations in the permit (i.e., 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). Similarly, the emissions from the cyclone/baghouse will not change appreciably as a result of the kiln-dried lumber production increasing to 250 million board feet per year.

The emissions from the cyclone/baghouse are governed by the PSD emissions rate of 0.004 grains per dry standard cubic foot (dscf) and the nominal flow rate of 60,000 dscfm. At this grain loading rate and air flow rate the emissions of PM/PM_{10} equate to 2.1 pounds per hour. Taking this operationg information in conjunction with the actual hours of operation the actual emissions for 2003 and 2004 from the planermill operations can be computed. The same information can be used to compute what would be the maximum future potential to emit since the cyclone/baghouse can operate a maximum 8,760 hours per year. A summary of the actual emissions and future potential to emit from the planermill operations is provided below in Table 3-3

TABLE 3-3

Summary of Actual and Future Potential Emissions from Planer Mill (Cyclone/Baghouse) (TPY)

Year	Hours of Operation	Particulate Matter
2003	5,410	5.68
2004	5,418	5.69
Average	3,948	5.68
Future Potential	8,760	9.20
Change		**3.52**

Note: Emissions of particulate matter, which can be assumed to be PM10, are based on a grain loading of 0.004 grains/SCF for the Planer Mill cyclone/baghouse The calculation of particulate matter emissions is based on using a flowrate of 60,000 DSCFM for the cyclone/baghouse.

3.2.3 Air Toxics

The emissions of air toxics will increase as a result of this project. The anticipated increases in air toxics are attributed to the increase in the quantity of kiln-dried lumber that is proposed. Data provided by NCASI indicates that the kiln drying process emits HAPs (acetaldehyde, acrolein, formaldehyde, methanol and propionaldehyde). A sampling of test data from indirect fired lumber kilns indicates that the emissions of these HAPS occur at the following levels: 0.0095 lb/MBF for

acetaldehyde, 0.006 lb/MBF for acrolein, 0.01 lb/MBF for formaldehyde, 0.24 lb/MBF for methanol and 0.001 lb/MBF for propionaldehyde. The average HAP emissions for last two years (expressed as operation at the permitted level of 225 million board feet per year) and the quantity that is expected as a result of increasing production to the 250 million board feet level per year are provided as follows in Table 3-4.

TABLE 3-4

Summary of Actual and Future Potential HAP Emissions from Dry Kilns (TPY)

Year	Volume Dried (MBF/Yr.)	Acetaldehyde	Acrolein	Formaldehyde	Methanol	Propionaldehyde	Total HAPs
Avg.	225,000	1.07	0.68	1.13	27.0	0.11	30.0
Future Potential	250,000	1.19	0.75	1.25	30.0	0.13	33.3
Increase		0.12	0.07	0.12	3.0	0.02	3.3

Note: Emissions based on using factors of 0.0095 lb/MBF for acetaldehyde, 0.006 lb/MBF for acrolein, 0.01 lb/MBF for formaldehyde and 0.24 lb/MBF for methanol and 0.001 lb/MBF for propionaldehyde. Future potential HAPs emissions assume that entire lumber production of 250,000 MBF per year will be kiln dried.

4.0 REGULATORY APPLICABILITY AND COMPLIANCE

This section presents a review of the federal and Florida state air quality regulations that govern the operations associated with the proposed modification of International Paper's McDavid Mill and demonstrates project compliance with all applicable rules.

4.1 Federal PSD/NSR Regulations

The federal regulatory programs administered by the EPA have been developed under the authority of the Clean Air Act (CAA). The following subsections review the key elements of the federal regulatory program and their impact on operations at the McDavid mill. Special attention will be placed on National Ambient Air Quality Standards (NAAQS) (40 CFR 50), New Source Performance Standards (NSPS) (40 CFR 60), National Emission Standards for Hazardous Air Pollutants (NESHAPS) (40 CFR 61 and 40 CFR 63), and Prevention of Significant Deterioration (PSD) (40 CFR 52.21). Many of the federal programs have been adopted by the State of Florida.

PSD review requirements (as described in 40 CFR 52.21) apply to construction of a "major stationary source or modification to a major source" in attainment or unclassifiable areas. In these areas, the ambient air quality is acceptable, and the NAAQS for the criteria pollutants carbon monoxide, nitrogen oxides, sulfur dioxide, particulate matter, and ozone (VOC) have not been exceeded. Sources subject to PSD review must apply BACT, conduct an air quality and additional impacts analyses, and undergo public participation during the permitting process (U.S. EPA, October 1990).

4.1.1 Classification of Ambient Air Quality

The 1970 Amendments to the CAA gave the EPA specific authority to establish minimum standards for air quality that all states would be required to achieve. These standards were developed in order to protect the public health (primary standards) and welfare (secondary standards). The federally promulgated standards, and similar standards adopted by the State of Florida, are presented in Table 4-1. Areas of the country that have ambient concentrations less than a standard are designated as "attainment areas," while those where monitoring indicates air quality is worse than standards are known as "nonattainment areas." The designation of an area has particular importance for a proposed project as it determines the type of permit review the application will undergo.

Major new sources or major modification to existing sources located in attainment areas are required to obtain a Prevention of Significant Deterioration (PSD) permit prior to initiation of construction. Similarly sources located in nonattainment areas, or that adversely impact such areas, undergo more stringent New Source Review (NSR). In either case it is necessary, as a first step, to determine the air quality classification of a project site.

TABLE 4-1

National and State Ambient Air Quality Standards
($\mu g/m^3$)

	Averaging Period	EPA Standards		Florida Standards
		Primary	Secondary	
PM-10	24-hour [1]	150	150	150[3]
	annual	50	50	50
PM-2.5	24-hour [1]	65	65	---
	annual	15	15	---
SO_2	3-hour [3]	---	1,300	1,300
	24-hour [3]	365	---	260
	Annual [3]	80	---	60
CO	1-hour [3]	---	40,000	40,000
	8-hour [3]	10,000	---	10,000
NO_2	annual [2]	100	100	100
Lead	Quarter	1.5	1.5	1.5
0_3	1-hour [3]	235	235	235
0_3	8-hour [3]	235	235	235

[1] Not to be exceeded on more than 3 days over 3 years

[2] Never to be exceeded.

[3] Not to be exceeded more than once per year.

Sources: 40CFR50; 36FR22384; 335-3-1-.03 A.A.C.

The 1990 CAA Amendments called for a review of the ambient air quality of all regions of the United States. States were required to file with the EPA by March 15, 1991 designations of all areas as attainment, nonattainment, or unclassifiable. The EPA was then to issue this list of area classifications. The current classification of Escambia County is listed in Table 4-2 for each criteria pollutant.

TABLE 4-2

Classification of Escambia County for Each Criteria Pollutant

Carbon Monoxide	Unclassifiable/Attainment
Oxides of Nitrogen	Unclassifiable/Attainment
Sulfur Dioxide	Better than Standards
Particulate Matter (PM-10)	Not Designated
Total Suspended Particulate	Better than Standards
Ozone	Unclassifiable/Attainment

Sources: 40 CFR 81.300, 1991
FR56694

4.1.2 PSD Requirements

The 1977 CAA Amendments added Part C - Prevention of Significant Deterioration to the Act. This part requires proposed new major stationary sources or major modifications in an area that has attained the NAAQS to secure a preconstruction permit that includes a detailed analysis of the source's emissions and its impacts.

PSD regulations are codified 40 CFR 52.21. The portion of the Florida State Implementation Plan (SIP) related to PSD regulation has been approved by the EPA, and authority for the PSD program has been transferred to the state. EPA maintains oversight review authority.

For the PSD regulations to apply, the proposed project must be in an area that has been classified as attainment or as unclassifiable for a particular pollutant. A project's potential to emit is then reviewed to determine whether it constitutes a new stationary source or a major modification of an existing major stationary source.

A major stationary source is one that has a potential to emit 100 tons per year (tpy) or more of any regulated pollutant if the source is listed as one of the 28 source categories identified in 40 CFR 52.21. Otherwise, any stationary source that has the potential to emit 250 tpy or more of a regulated pollutant is classified as major. Lumber mills are not one of the 28 listed source categories; therefore, the 250-

tpy threshold applies. "Potential to emit" is determined by annual emissions after the application of air pollution control equipment, or any other federally enforceable restriction.

According to EPA's New Source Review Workshop Manual (EPA 1990a), for a modification to be classified as "major" and, therefore, subject to PSD review:

1. The modification must occur at an existing major stationary source and the net emissions increase of any regulated pollutant emitted by the source, as a result of modification, must be "significant"; or

2. The modification must result in an emissions increase, which if considered alone, would constitute a major source.

"Significant" emission rates are defined as amounts equal to or greater than the emission rates given in Table 4-3.

TABLE 4-3

PSD Significant Emission Rates

Pollutant	Emission Rate (tpy)
Carbon Monoxide	100
Nitrogen Oxides	40
Sulfur Dioxide	40
Total Suspended Particulates	25
PM-10	15
Ozone (VOC) [1]	40
Lead	0.6
Fluorides	3
Sulfuric Acid Mist	7
Total Reduced Sulfur	10
Hydrogen Sulfide	10

[1]VOC = volatile organic compound.

Major new facilities and major modifications are required to undergo the following analyses and reviews related to PSD for each pollutant emitted in significant amounts:

- Increments/ Classifications;
- Control Technology Review;
- Air quality Monitoring Analysis;
- Source Impact Analysis;
- Additional Impact Analyses; and
- Good Engineering Practice (GEP) Stack Height Analysis.

Before going into detail on these specific PSD requirements an analysis should be made to determine if the emissions increases associated with this application will cause the McDavid mill to be subject to PSD review. A PSD applicability analysis has been provided as follows

4.1.3 PSD Applicability

The McDavid mill is located in Escambia County. Escambia County is currently designated as an attainment or unclassifiable area for all six criteria pollutants. The McDavid mill is classified as a major stationary source because it emits or has the potential to emit 250 tons per year of any regulated pollutant. The proposed emissions increase for the McDavid mill would be a major modification to an existing major stationary source located in a PSD area, and would be subject to PSD review if it results in a significant emissions increase of any regulated pollutant.

The cumulative change in emissions from the proposed production increase is the summation of the change in emissions anticipated from the existing wood fired boilers, the lumber kilns and the planer mill. These emissions changes were presented in Tables 3-2 and 3-3 of this application. Table 4-4 reflects that the cumulative change in emissions from the proposed project is less than the PSD significance level for VOC and particulates, therefore, this project does not constitute a major modification and the PSD regulations do not apply.

TABLE 4-4

Cumulative Increases in Emissions from Requested Production Increase

Pollutant	Boilers (TPY)	Lumber Kilns (TPY)	Planer Mill Cyclone/ Baghouse (TPY)	Total Net Change (TPY)	PSD Significant Emission Rate (TPY)	PSD Applicability
PM	-	0.4	3.52	3.92	15	No
SO_2	-	-	-	-	40	No
NO_X	-	-	-	-	40	No
CO	-	-	-	-	100	No
VOC	-	35.5	-	35.5	40	No

4.2 New Source Performance Standards (NSPS)

NSPS prescribe minimum requirements for control of emissions from new and/or modified emission sources. The NSPS may be described in one or more ways including maximum mass emission limits (i.e., lb/MMBtu, gr/dscf), control efficiency requirements (i.e., minimum percentage removal of inlet pollutants), technological requirements (i.e., a specific reference technology or equivalent), or operational/work practice standards. The NSPS must be met by all new or modified sources that meet the applicability requirements specified under each subpart. There is no general exclusion from NSPS based on emission levels; however, many NSPS apply only when source capacity exceeds a given threshold. Currently, NSPS limits are promulgated for 72 separate source categories in 40 CFR Part 60. However, there are no sources that will be constructed or modified at the mill associated with this production increase for which an NSPS has been promulgated.

4.3 National Emission Standards for Hazardous Air Pollutants (NESHAP) and Related Air Toxics Requirements

The current regulations that have been developed to control emissions of hazardous air pollutants (HAPs) are the NESHAPs, initially codified in 40 CFR Part 61 only. This part contains a listing of those pollutants that have been designated as being hazardous along with standards applicable to specific industries. Unlike the NSPS, NESHAPs are applicable to both new and existing sources that emit pollutants regulated by this part.

The 1990 CAA Amendments significantly expanded the number of HAPs to be regulated. Under the Amendments, 189 (recently revised to 188) compounds or classes of compounds are to be regulated.

Maximum Achievable Control Technology (MACT) standards are to be applied to sources with controlled HAPs emissions of 10 tpy of any single compound or 25 tpy or more of all 188 regulated HAPs in combination. These requirements, codified in 40 CFR 63, are to be phased in during future years.

On July 30, 2004, the final MACT rule for Plywood and Composite Wood Products Manufacture (Subpart DDDD) was published in the Federal Register. Lumber drying kilns will become subject to some of the requirements in Subpart DDDD. The requirements for kilns are limited to monitoring, record keeping and reporting requirements.

Projects which will cause a source (facility) to become major for HAPs are required to conduct a case-by case MACT determination in cases where a MACT standard has not been promulgated. However, since the MACT standard has been promulgated as discussed above there is no requirement for a case-by case MACT determination in this instance.

4.4 Florida Air Quality Regulations

Included with the original PSD construction permit application that was prepared for this facility in June 1999 (application prepared for Champion International Corporation) was a thorough evaluation of the applicability of FDEP regulations. Since this application does not involve the installation of any new equipment it has been determined that what was or was not applicable (FDEP regulations) at that time would generally remain the same today. This being the case, an evaluation of the Florida air quality regulations that pertain to this application has been addressed by including the regulatory applicability analysis that was previously conducted as an appendix (see Appendix B).

5.0 COMPLIANCE SUMMARY

International Paper's McDavid facility will comply with all applicable statutes and regulations that address each of the sources that are part of this project.

A review of the NSPS and NESHAPs (Part 61) identifies no NSPS, that will apply to this project at this time. There is, however, MACT standards (NESHAPS Part 63) that will apply to the existing equipment at the McDavid mill at a later date. Dispersion modeling was not required for this application and it has been determined that anything associated with this request to increase production will have no difficulty in complying with the State of Florida's air quality regulations.

6.0 REFERENCES

June 1999, *McDavid Sawmill Air Construction Permit Application,* Champion International Corporation, ECT No. 990294-0100.

EPA, 1990a. *New Source Review Workshop Manual (Draft) Office of Air Quality Planning and Standards*, Research Triangle Park, North Carolina.

APPENDIX A

FDEP Permit Application Forms

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **International Paper Company**	
2. Site Name: **McDavid Softwood Converting Facility**	
3. Facility Identification Number: **0330260**	
4. Facility Location: Street Address or Other Locator: **401 Champion Drive** City: **McDavid** County: **Escambia** Zip Code: **32568**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Dearl Hilyer**
2. Application Contact Mailing Address... Organization/Firm: **International Paper Company** Street Address: **401 Champion Drive** City: **McDavid** State: **FL** Zip Code: **32568**
3. Application Contact Telephone Numbers... Telephone: **(850) 587-1084** ext. Fax: **(850) 587-1003**
4. Application Contact Email Address:

Application Processing Information (DEP Use) R Bradburn

1. Date of Receipt of Application:	6/7/05
2. Project Number(s):	0330260-005-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☒ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.
☐ Title V air operation permit revision.
☐ Title V air operation permit renewal.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.
☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Natural Gas-Fired Package Boiler No. 1	N/A	N/A
002	Natural Gas-Fired Package Boiler No. 1	N/A	N/A
003	Lumber Drying Kilns Nos. 1-3	N/A	N/A
004	Planermill Operations	N/A	N/A
005	Facility Fugitive Emissions	N/A	N/A

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:
   Allen Smith, Plant Manager

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **International Paper Company**
   Street Address: **401 Champion Drive**
   City: **McDavid** State: **Florida** Zip Code: **32568**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(850) 587-1002** ext. Fax: **(850) 587-1003**

4. Owner/Authorized Representative Email Address:

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

Signature

6/5/05
Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
   Allen Smith, Plant Manager

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☒ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
   - ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
   - ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
   - ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **International Paper Company**
   Street Address: **401 Champion Drive**
   City: **McDavid** State: **Florida** Zip Code: **32568**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(850) 587-1002** ext. Fax: **(850) 587-1003**

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature 6/3/05 Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Mr. Barry D. Andrews, P.E.**
   Registration Number: **P.E. 36024**
2. Professional Engineer Mailing Address...
   Organization/Firm: **RTP Environmental Associates, Inc.**
   Street Address: **254 Seville Street, Unit #3**
   City: **Florence** State: **AL** Zip Code: **35630**
3. Professional Engineer Telephone Numbers...
   Telephone: **(256) 740-5522** ext. Fax: **(256) 740-6858**
4. Professional Engineer Email Address: **bandrews@rtpenv.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Barry D. Andrews — Signature

5/31/2005 — Date

(seal)

BARRY D. ANDREWS CERTIFICATE NO. 36024 STATE OF ALABAMA REGISTERED ENGINEER

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **16** East (km) **468.74** North (km) **3406.5**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **24**	6. Facility SIC(s): **2421**
7. Facility Comment:			

Facility Contact

1. Facility Contact Name: **Dearl Hilyer-EHS Manager, Wood Products**
2. Facility Contact Mailing Address... Organization/Firm: **International Paper Company** Street Address: **401 Champion Drive** City: **McDavid** State: **Florida** Zip Code: **32568**
3. Facility Contact Telephone Numbers: Telephone: **(850) 587-1084** ext. Fax: **(850) 587-1003**
4. Facility Contact Email Address:

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☒ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☒ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
VOC	**A**	
H115 (Methanol)	**A**	
HAPS	**A**	
NOX	**B**	
CO	**SM**	
PM	**B**	

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NA	**NA**	**NA**	**NA**	**NA**	**NA**

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Figure 2-1** ☐ Previously Submitted, Date:
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Figure 2-2** ☐ Previously Submitted, Date:
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Appendix B** ☐ Previously Submitted, Date:_____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ ☒ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification:
   ☐ Attached, Document ID: **See Section 2.3 of Permit Application**
3. Rule Applicability Analysis:
   ☐ Attached, Document ID: **See Appendix B**
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☒ Attached, Document ID: **App. B** ☐ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):
   ☐ Attached, Document ID: ☒ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):
   ☐ Attached, Document ID:_____ ☒ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):
   ☐ Attached, Document ID:_____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):
   ☐ Attached, Document ID:_____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:_____ ☒ Not Applicable

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID: ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:_____
   ☐ Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:_____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ ☐ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:_____ ☐ Not Applicable

Additional Requirements Comment

No items have been checked on this page since this is an application for a construction permit and not an operating permit.

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☒ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☒ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Emissions unit consists of three indirect, steam heated lumber drying kilns.

3. Emissions Unit Identification Number: **003 (K-1 through K-3)**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date: **10/01/05**	6. Initial Startup Date: **12/04/00**	7. Emissions Unit Major Group SIC Code: **24**	8. Acid Rain Unit? ☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
The initial startup date is the date that the kilns began operation. The commence construction date is projected to be the point in time that the production rate through the kilns will surpass the initially permitted production level of 225 million board feet per year.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description: **N/A**

2. Control Device or Method Code(s):

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **N/A**	
2. Maximum Production Rate: **250 million board feet per year**	
3. Maximum Heat Input Rate: **N/A** million Btu/hr	
4. Maximum Incineration Rate: **N/A** pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment:	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ? **K-1, K-2, K-3**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **Lumber Kilns 1 through 3, 10 vents per kiln. 5 vents are in use at any one time.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **None**		
5. Discharge Type Code: **W**	6. Stack Height: **25.3** feet	7. Exit Diameter: **5.8** feet
8. Exit Temperature: **209** °F	9. Actual Volumetric Flow Rate: **34,502** acfm	10. Water Vapor: **N/A** %
11. Maximum Dry Standard Flow Rate: **N/A** dscfm	15. Nonstack Emission Point Height: feet	
15. Emission Point UTM Coordinates... Zone: East (km): North (km) :	15. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment : **Diameter representsequivalent diameter for 5, 28 » x 28 » vents.** **Stack temperature and flow rate are averages for 18 hour drying cycle.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Drying of green wood in indirect, steam heated lumber kilns**		
2. Source Classification Code (SCC): **30700898**	3. SCC Units: **1,000 Board Feet**	
4. Maximum Hourly Rate: **25.7**	5. Maximum Annual Rate: **250,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	**None**	**None**	**NS**
H001	**None**	**None**	**NS**
H006	**None**	**None**	**NS**
H095	**None**	**None**	**NS**
H115	**None**	**None**	**NS**
H001	**None**	**None**	**NS**
H006	**None**	**None**	**NS**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **85.9** lb/hour **355** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **3.32 lb/MBF** Reference: **NCASI data**	7. Emissions Method Code: **5**

8. Calculation of Emissions:

Hourly emission rate = 3.32 lb/MBF x 25.86 MBF = 85.9 lb/hr

Annual emission rate = 2.84 lb/MBF x 250,000 MBF/yr x (ton/2,000 lb) = 355 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **H001**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **0.25** lb/hour **1.19** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **0.0095 lb/MBF** Reference: **NCASI data**	7. Emissions Method Code: **5**

8. Calculation of Emissions:

Hourly emission rate = 0.0095 lb/MBF x 25.86 MBF = 0.25 lb/hr

Annual emission rate = 0.0095 lb/MBF x 250,000 MBF/yr x (ton/2,000 lb) = 1.19 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **H006**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **0.16** lb/hour **0.75** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **0.006 lb/MBF** Reference: **NCASI data**	7. Emissions Method Code: **5**
8. Calculation of Emissions: **Hourly emission rate = 0.006 lb/MBF x 25.86 MBF = 0.16 lb/hr** **Annual emission rate = 0.006 lb/MBF x 250,000 MBF/yr x (ton/2,000 lb) = 0.75 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **H095**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **0.26** lb/hour **1.25** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **0.01 lb/MBF** Reference: **NCASI data**	7. Emissions Method Code: **5**
8. Calculation of Emissions: **Hourly emission rate = 0.01 lb/MBF x 25.86 MBF = 0.26 lb/hr** **Annual emission rate = 0.01 lb/MBF x 250,000 MBF/yr x (ton/2,000 lb) = 1.25 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **H115**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **6.21** lb/hour **30.0** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **0.24 lb/MBF** Reference: **NCASI data**	7. Emissions Method Code: **5**

8. Calculation of Emissions:

Hourly emission rate = 0.24 lb/MBF x 25.86 MBF = 6.21 lb/hr

Annual emission rate = 0.24 lb/MBF x 250,000 MBF/yr x (ton/2,000 lb) = 30.0 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: **VE5**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Reference Method 9 (Annual)**	
5. Visible Emissions Comment: **Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC,Section III., Specific Condition No. 12.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE100**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: **Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C.**	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 1

N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Figure 2-2** ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Previously Submitted, Date:
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ To be Submitted, Date (if known):_____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Not Applicable

   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ **Not a Title V Permit Application**
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:_____
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☒ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☒ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Emissions unit consists of planermill planning and trimming operations.

3. Emissions Unit Identification Number: **004**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date: **10/01/05**	6. Initial Startup Date: **1/06/01**	7. Emissions Unit Major Group SIC Code: **24**	8. Acid Rain Unit? ☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
The initial startup date is the date that the planermill began operation. The commence construction date is projected to be the point in time that the production rate through the planermill will surpass the initially permitted production level of 225 million board feet per year.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Planermill planning and trimming operations are equipped with local exhaust ventilation (LEV) to collect PM/PM_{10} shavings. Collected shavings are conveyed pneumatically to a cyclone/baghouse control system.

Control Codes:

Medium Efficiency Centrifugal Collector = 008
Low Temperature Fabric Filter = 018

2. Control Device or Method Code(s): **008 and 018**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: **250 million board feet per year**	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment:	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ? **DC-1**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **N/A**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **N/A**		
5. Discharge Type Code: **W**	6. Stack Height: **23** feet	7. Exit Diameter: **3.2** feet
8. Exit Temperature: **77** °F	9. Actual Volumetric Flow Rate: **60,000** acfm	10. Water Vapor: **N/A** %
11. Maximum Dry Standard Flow Rate: **N/A** dscfm	15. Nonstack Emission Point Height: feet	
15. Emission Point UTM Coordinates... Zone: East (km): North (km) :	15. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment :		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Planing and trimming of dried lumber.**		
2. Source Classification Code (SCC): **30700898**	3. SCC Units: **1,000 Board Feet**	
4. Maximum Hourly Rate: **25.7**	5. Maximum Annual Rate: **250,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
1 - PM	**008**	**018**	**EL**
2 – PM_{10}	**008**	**018**	**EL**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **99+**
3. Potential Emissions: **2.1** lb/hour **9.2** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **2.1 lb/hr** Reference: **Allowable Emissions Rate**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly emission rate = 2.1 lb/hr** **Annual emission rate = 2.1 lb/hr x 8,760 hr/yr x (ton/2,000 lb) = 9.2 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **2.1 lb/hr**	4. Equivalent Allowable Emissions: **2.1** lb/hour **9.2** tons/year
5. Method of Compliance: **EPA Reference Method 5 (Initial Compliance Only)**	
6. Allowable Emissions Comment (Description of Operating Method): **FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC, Section III., Specific Condition No. 16.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **5% Opacity**	4. Equivalent Allowable Emissions: **2.1** lb/hour **9.2** tons/year
5. Method of Compliance: **EPA Reference Method 9 (Annual)**	
6. Allowable Emissions Comment (Description of Operating Method): **FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC, Section III., Specific Condition No. 17.**	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control: **99+**
3. Potential Emissions: **2.1** lb/hour **9.2** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): **N/A** to tons/year	
6. Emission Factor: **2.1 lb/hr** Reference: **Allowable Emissions Rate**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly emission rate = 2.1 lb/hr** **Annual emission rate = 2.1 lb/hr x 8,760 hr/yr x (ton/2,000 lb) = 9.2 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **2.1 lb/hr**	4. Equivalent Allowable Emissions: **2.1** lb/hour **9.2** tons/year
5. Method of Compliance: **EPA Reference Method 5 (Initial Compliance Only)**	
6. Allowable Emissions Comment (Description of Operating Method): **FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC, Section III., Specific Condition No. 16.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **5% Opacity**	4. Equivalent Allowable Emissions: **2.1** lb/hour **9.2** tons/year
5. Method of Compliance: **EPA Reference Method 9 (Annual)**	
6. Allowable Emissions Comment (Description of Operating Method): **FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC, Section III., Specific Condition No. 17.**	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: **VE5**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Reference Method 9 (Annual)**	
5. Visible Emissions Comment: **FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)** **Final Permit No. 03302060-001-AC, Section III., Specific Condition No. 17.**	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype: **VE100**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: **Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C.**	

H. CONTINUOUS MONITOR INFORMATION – Not Applicable

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor _ of _

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Fig 2-2** ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Previously Submitted, Date:
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ To be Submitted, Date (if known):_____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Not Applicable

   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ **Not a Title V Permit Application**
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:_____
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☐ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☒ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☒ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Emissions unit consists of facility-wide fugitive PM/PM_{10} activities including log preparation (sawing and debarking), wood by-product handling and storage (conveying, screening, chipping, enclosed [bin] and outdoor storage, and truck loading), and truck traffic on paved roadways.

3. Emissions Unit Identification Number: **005 (F-1 through F-35)**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date: **10/01/05**	6. Initial Startup Date: **12/04/00**	7. Emissions Unit Major Group SIC Code: **24**	8. Acid Rain Unit? ☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

The initial startup date is the date that the mill began operation. The commence construction date is projected to be the point in time that the production rate through the kilns at the mill will surpass the initially permitted production level of 225 million board feet per year.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Fugitive PM/PM_{10} control methods include handling of moist materials, enclosures, and periodic sweeping and watering of logs in storage and facility roadways, as necessary.

2. Control Device or Method Code(s): **099 (Miscellaneous)**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **250 million board feet per year**
2. Maximum Production Rate:
3. Maximum Heat Input Rate: **N/A** million Btu/hr
4. Maximum Incineration Rate: **N/A** pounds/hr tons/day
5. Requested Maximum Operating Schedule: hours/day days/week weeks/year hours/year
6. Operating Capacity/Schedule Comment: **The emissions of fugitive emissions have been calculated based on the amount of materials handling associated with drying 250 million board feet of lumber per year.**

C. EMISSION POINT (STACK/VENT) INFORMATION - Not Applicable
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ?	2. Emission Point Type Code: **3**
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:	

5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: **N/A** %

11. Maximum Dry Standard Flow Rate: **N/A** dscfm	15. Nonstack Emission Point Height: feet
15. Emission Point UTM Coordinates... Zone: East (km): North (km) :	15. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)
15. Emission Point Comment :	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Log preparation (sawing and debarking), wood by-product handling and storage (conveying, screening, chipping, enclosed [bin] and outdoor storage, and truck loading), and truck traffic on paved roadways.**		
2. Source Classification Code (SCC): **30700898**	3. SCC Units: **1,000 Board Feet**	
4. Maximum Hourly Rate: **25.7**	5. Maximum Annual Rate: **250,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
1 - PM			**NS**
2 – PM10			**NS**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): **16.55** to **18.39** tons/year	
6. Emission Factor: Reference: **June 1999 Air Construction Permit Application**	7. Emissions Method Code:
8. Calculation of Emissions: **The range of estimated fugitive emissions has been based on what was contained in the June 1999 Air Construction Permit Application for operating at 225 million board feet per year (low end of range) and subsequently projected to the 250 million board feet per year level to estimate the high end of the range. The spreadsheet from the June 1999 Air Construction Permit Application that calculated the emissions of PM from paved haul road traffic is included in Appendix B of this application.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **The range of estimated fugitive emissions address paved haul road traffic only. Recent AP-42 factors indicate that the emissions from the other activities addressed in the June 1999 application were non-detectable (see AP-42 Table 10.5-7, dated January 2002).**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - Not Applicable
ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – Not Applicable
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): **3.22** to **3.58** tons/year	
6. Emission Factor: Reference: **June 1999 Air Construction Permit Application**	7. Emissions Method Code:
8. Calculation of Emissions: **The range of estimated fugitive emissions has been based on what was contained in the June 1999 Air Construction Permit Application for operating at 225 million board feet per year (low end of range) and subsequently projected to the 250 million board feet per year level to estimate the high end of the range. The spreadsheet from the June 1999 Air Construction Permit Application that calculated the emissions of PM_{10} from paved haul road traffic is included in Appendix B of this application.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **The emissions address paved haul road traffic only. Recent AP-42 factors indicate that the emissions from the other activities addressed in the June 1999 application were non-detectable (see AP-42 Table 10.5-7, dated January 2002).**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - Not Applicable

ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION – Not Applicable

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION - Not Applicable

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Fig. 2-2** ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **See App. B** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Previously Submitted, Date:
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ To be Submitted, Date (if known):_____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Not Applicable

   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ **Not a Title V Permit Application**
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:_____
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☒ Not Applicable

Additional Requirements Comment

APPENDIX B

Attachments to FDEP Application Forms

FACILITY ADDITIONAL INFORMATION FOR FDEP FORMS

Precautions to Prevent Emissions of Unconfined Particulate Matter

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

Unconfined particulate matter emissions that may result from McDavid Sawmill operations include:

- Vehicular traffic on paved and unpaved roads.
- Wind-blown dust from yard areas.
- Periodic abrasive blasting.

The following techniques may be used to control unconfined particulate matter emissions on an as needed basis:

- Chemical or water application to:
  - Paved yard areas
  - Unpaved yard areas
- Paving and maintenance of roads, parking areas and yards.
- Landscaping or planting of vegetation.
- Confining abrasive blasting where possible.
- Other techniques, as necessary

Summary of FDEP Regulatory Applicability from June 1999 Application

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 1 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Chapter 62-4, F.A.C. - Permits: Part I General					
Scope of Part I	62-4.001, F.A.C.	X			Contains no applicable requirements.
Definitions	62-4.020, .021, F.A.C.	X			Contains no applicable requirements.
Transferability of Definitions	62-4.021, .021, F.A.C.	X			Contains no applicable requirements.
General Prohibition	**62-4.030, F.A.C[1]**		X		All stationary air pollution sources must be permitted, unless otherwise exempted.
Exemptions	**62-4.040, F.A.C[1]**		X		Certain structural changes exempt from permitting. Other stationary sources exempt from permitting upon FDEP insignificance determination.
Procedures to Obtain Permits	**62-4.050, F.A.C.[1]**		X		General permitting requirements.
Surveillance Fees	62-4.052, F.A.C.	X			Not applicable to air emission sources.
Permit Processing	62-4.055, F.A.C.	X			Contains no applicable requirements.
Consultation	62-4.060, F.A.C.	X			Consultation is encouraged, not required.
Standards for Issuing or Denying Permits; Issuance; Denial	62-4.070, F.A.C	X			Establishes standard procedures for FDEP. Requirement is not applicable to Smith Unit 3.
Modification of Permit Conditions	62-4.080, F.A.C	X			Application is for initial construction permit. Modification of permit conditions is not being requested.
Renewals	**62-4.090, F.A.C.[1]**		X		Establishes permit renewal criteria. Additional criteria are cited at 62-213.-430(3), F.A.C. **(future requirement)**
Suspension and Revocation	**62-4.100, F.A.C.[1]**		X		Establishes permit suspension and revocation criteria.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 2 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Financial Responsibility	62-4.110, F.A.C.	X			Contains no applicable requirements.
Transfer of Permits	62-4.120, F.A.C.	X			A sale or legal transfer of a permitted facility is not included in this application.
Plant Operation - Problems	**62-4.130, F.A.C.**[1]		X		Immediate notification is required whenever the permittee is temporarily unable to comply with any permit condition. Notification content is specified. **(potential future requirement)**
Review	62-4.150, F.A.C.	X			Contains no applicable requirements.
Permit Conditions	62-4.160, F.A.C.	X			Contains no applicable requirements.
Scope of Part II	62-4.200, F.A.C.	X			Contains no applicable requirements.
Construction Permits	62-4.210, F.A.C.	X			General requirements for construction permits.
Operation Permits for New Sources	62-4.220, F.A.C.	X			General requirements for initial new source operation permits. **(future requirement)**
Water Permit Provisions	62-4.240 - 250, F.A.C.	X			Contains no applicable requirements.
Chapter 62-17, F.A.C. - Electrical Power Plant Siting		X			Power Plant Siting Act provisions.
Chapter 62-102, F.A.C. - Rules of Administrative Procedure - Rule Making			X		General administrative procedures.
Chapter 62-103, F.A.C. - Rules of Administrative Procedure - Final Agency Action			X		General administrative procedures.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 3 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Chapter 62-204, F.A.C. - State Implementation Plan					
State Implementation Plan	62-204.100, .200, .220(1)-(3), .240, .260, .320, .340, .360, .400, and .500, F.A.C.	X			Contains no applicable requirements.
Ambient Air Quality Protection	62-204.220(4), F.A.C.		X		Assessments of ambient air pollutant impacts must be made using applicable air quality models, data bases, and other requirements approved by FDEP and specified in 40 CFR Part 51, Appendix W.
State Implementation Plan	62-204.800(1) - (6), F.A.C.	X			Referenced federal regulations contain no applicable requirements.
State Implementation Plan	**62-204.800(7)(a), (b)4., (c), (d), and (e), F.A.C.**[1]			B-1, B-2	NSPS Subpart Dc; see Table A-1 for detailed federal regulatory citations.
State Implementation Plan	62-204.800(8) - (13), (15), (17), (20), and (22) F.A.C.	X			Referenced federal regulations contain no applicable requirements.
State Implementation Plan	62-204.800 (14), (15), (16), (17), (18), (19), F.A.C.	X			Acid Rain Program
State Implementation Plan	**62-204.800(21), F.A.C.**[1]		X		Protection of Stratospheric Ozone; see Table A-1 for detailed federal regulatory citations.
Chapter 62-210, F.A.C. - Stationary Sources - General Requirements					
Purpose and Scope	62-210.100, F.A.C.	X			Contains no applicable requirements.
Definitions	62-210.200, F.A.C.	X			Contains no applicable requirements.
Small Business Assistance Program	62-210.220, F.A.C.	X			Contains no applicable requirements.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 4 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permits Required	62-210.300(1) and (3), F.A.C.		X		Air construction permit required. Exemptions from permitting specified for certain facilities and sources.
Permits Required	62-210.300(2), F.A.C.		X		Air operation permit required. **(future requirement)**
Air General Permits	62-210.300(4), F.A.C.	X			Not applicable to the McDavid Sawmill.
Notification of Startup	62-210.300(5), F.A.C.	X			Sources which have been shut down for more than one year shall notify the FDEP prior to startup.
Emission Unit Reclassification	62-210.300(6), F.A.C.		X		Emission unit reclassification **(potential future requirement)**
Public Notice and Comment					
Public Notice of Proposed Agency Action	62-210.350(1), F.A.C.		X		All permit applicants required to publish notice of proposed agency action.
Additional Notice Requirements for Sources Subject to Prevention of Significant Deterioration or Nonattainment Area New Source Review	62-210.350(2), F.A.C.		X		Additional public notice requirements for PSD and nonattainment area NSR applications.
Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources	62-210.350(3), F.A.C.		X		Notice requirements for Title V operating permit applicants **(future requirement)**.
Public Notice Requirements for FESOPS and 112(g) Emission Sources	62-210.350(4) and (5), F.A.C.	X			Not applicable to the McDavid Sawmill.
Administrative Permit Corrections	62-210.360, F.A.C.	X			An administrative permit correction is not requested in this application.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 5 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Reports Notification of Intent to Relocate Air Pollutant Emitting Facility	62-210.370(1), F.A.C.	X			Project does not have any relocatable emission units.
Annual Operating Report for Air Pollutant Emitting Facility	62-210.370(3), F.A.C.		X		Specifies annual reporting requirements. **(future requirement)**.
Stack Height Policy	62-210.550, F.A.C.		X		Limits credit in air dispersion studies to good engineering practice (GEP) stack heights for stacks constructed or modified since 12/31/70.
Circumvention	62-210.650, F.A.C.			Units with control equipment	An applicable air pollution control device cannot be circumvented and must be operated whenever the emission unit is operating.
Excess Emissions	62-210.700(1), F.A.C.		X		Excess emissions due to startup, shut down, and malfunction are permitted for no more than two hours in any 24 hour period unless specifically authorized by the FDEP for a longer duration.
Excess Emissions	62-210.700(2) and (3), F.A.C.	X			Not applicable to the McDavid Sawmill.
Excess Emissions	62-210.700(4), F.A.C.		X		Excess emissions caused entirely or in part by poor maintenance, poor operations, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction are prohibited. **(potential future requirement)**.
Excess Emissions	62-210.700(5), F.A.C.	X			Contains no applicable requirements.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 6 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Excess Emissions	62-210.700(6), F.A.C.		X		Excess emissions resulting from malfunctions must be reported to the FDEP in accordance with 62-4.130, F.A.C. **(potential future requirement)**.
Forms and Instructions	62-210.900(5), F.A.C.		X		Contains AOR requirements.
Notification Forms for Air General Permits	62-210.920, F.A.C.	X			Contains no applicable requirements.
Chapter 62-212, F.A.C. - Stationary Sources - Preconstruction Review					
Purpose and Scope	62-212.100, F.A.C.	X			Contains no applicable requirements.
General Preconstruction Review Requirements	62-212.300, F.A.C.		X		General air construction permit requirements.
Prevention of Significant Deterioration	62-212.400, F.A.C.		X		PSD permit required prior to construction of the McDavid Sawmill.
New Source Review for Nonattainment Areas	62-212.500, F.A.C.	X			McDavid Sawmill is not located in a nonattainment area or a nonattainment area of influence.
Sulfur Storage and Handling Facilities	62-212.600, F.A.C.	X			Applicable only to sulfur storage and handling facilities.
Air Emissions Bubble	62-212.710, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution					
Purpose and Scope	62-213.100, F.A.C.	X			Contains no applicable requirements.
Annual Emissions Fee	62-213.205(1), and (4), F.A.C.		X		Annual emissions fee and documentation requirements. **(future requirement)**
Annual Emissions Fee	62-213.205(2) and (3), F.A.C.	X			Contains no applicable requirements.
Title V Air General Permits	62-213.300, F.A.C.	X			No eligible facilities

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 7 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permits and Permit Revisions Required	62-213.400, F.A.C.		X		Title V operation permit required. **(future requirement)**
Changes Without Permit Revision	62-213.410, F.A.C.		X		Certain changes may be made if specific notice and recordkeeping requirements are met **(potential future requirement).**
Immediate Implementation Pending Revision Process	62-213.412, F.A.C.		X		Certain modifications can be implement-ed pending permit revision if specific criteria are met **(potential future requirement).**
Fast-Track Revisions of Acid Rain Parts	62-213.413, F.A.C.	X			Optional provisions for Acid Rain permit revisions.
Trading of Emissions within a Source	62-213.415, F.A.C.	X			Applies only to facilities with a federally enforceable emissions cap.
Permit Applications	62-213.420(1)(a)2. and (1)(b), (2), (3), and (4), F.A.C.		X		Title V operating permit application required no later than 180 days after commencing operation. **(future requirement)**
Permit Issuance, Renewal, and Revision					
Action on Application	62-213.430(1), F.A.C.	X			Contains no applicable requirements.
Permit Denial	62-213.430(2), F.A.C.	X			Contains no applicable requirements.
Permit Renewal	62-213.430(3), F.A.C.		X		Permit renewal application requirements **(future requirement).**
Permit Revision	62-213.430(4), F.A.C.		X		Permit revision application requirements **(potential future requirement).**
EPA Recommended Actions	62-213.430(5), F.A.C.	X			Contains no applicable requirements.
Insignificant Emission Units	62-213.430(6), F.A.C.		X		Contains no applicable requirements.
Permit Content	62-213.440, F.A.C.	X			Agency procedures, contains no applicable requirements.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 8 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permit Review by EPA and Affected States	62-213.450, F.A.C.	X			Agency procedures, contains no applicable requirements.
Permit Shield	62-213.460, F.A.C.		X		Provides permit shield for facilities in compliance with permit terms and conditions. **(future requirement)**
Forms and Instructions	62-213.900(1), F.A.C.		X		Contains annual emissions fee form requirements.
Chapter 62-214—Requirements for Sources Subject to the Federal Acid Rain Program		X			Acid Rain Program requirements.
Chapter 62-242 - Motor Vehicle Standards and Test Procedures	62-242, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-243 - Tampering with Motor Vehicle Air Pollution Control Equipment	62-243, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-252 - Gasoline Vapor Control	62-252, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-256 - Open Burning and Frost Protection Fires					
Declaration and Intent	62-256.100, F.A.C.	X			Contains no applicable requirements.
Definitions	62-256.200, F.A.C.	X			Contains no applicable requirements.
Prohibitions	**62-256.300, F.A.C.**[1]		X		Prohibits open burning.
Burning for Cold and Frost Protection	62-256.450, F.A.C.	X			Limited to agricultural protection.
Land Clearing	**62-256.500, F.A.C.**[1]		X		Defines allowed open burning for non-rural land clearing and structure demolition.
Industrial, Commercial, Municipal, and Research Open Burning	**62-256.600, F.A.C.**[1]		X		Prohibits industrial open burning

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 9 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Open Burning allowed	**62-256.700, F.A.C.[1]**		X		Specifies allowable open burning activities. **(potential future requirement)**
Effective Date	**62-256.800, F.A.C.[1]**	X			Contains no applicable requirements.
Chapter 62-257 - Asbestos Fee	62-257, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-281 - Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling	62-281, F.A.C.	X			Not applicable to the McDavid Sawmill.
Chapter 62-296 - Stationary Source - Emission Standards					
Purpose and Scope	62-296.100, F.A.C.	X			Contains no applicable requirements
General Pollutant Emission Limiting Standard, Volatile Organic Compounds Emissions	62-296.320(1), F.A.C.		X		Known and existing vapor control devices must be applied as required by the Department.
General Pollutant Emission Limiting Standard, Objectionable Odor Prohibited	**62-296.320(2), F.A.C.[1]**		X		Objectionable odor release is prohibited.
General Pollutant Emission Limiting Standard, Industrial, Commercial, and Municipal Open Burning Prohibited	**62-296.320(3), F.A.C.[1]**		X		Open burning in connection with industrial, commercial, or municipal operations is prohibited.
General Particulate Emission Limiting Standard, Process Weight Table	62-296.320(4)(a), F.A.C.	X			McDavid Sawmill does not have any applicable emission units. Combustion emission units are exempt per 62-296.320(4)(a)1a.
General Particulate Emission Limiting Standard, General Visible Emission Standard	62-296.320(4)(b), F.A.C.		X		Opacity limited to 20 percent, unless otherwise permitted. Test methods specified.
General Particulate Emission Limiting Standard, Unconfined Emission of Particulate Matter	62-296.320(4)(c), F.A.C.		X		Reasonable precautions must be taken to prevent unconfined particulate matter emission.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 10 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Specific Emission Limiting and Performance Standards	62-296.401 through 62-296.417, F.A.C.	X			None of the referenced standards are applicable to the McDavid Sawmill.
Reasonably Available Control Technology (RACT) Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO_x) Emitting Facilities	62-296.500 through 62-296.516, F.A.C.	X			McDavid Sawmill is not located in an ozone nonattainment area or an ozone air quality maintenance area.
Reasonably Available Control Technology (RACT) - Requirements for Major VOC- and NO_x-Emitting Facilities	62-296.570, F.A.C.	X			McDavid Sawmill is not located in a specified ozone nonattainment area or a specified ozone air quality maintenance area (i.e., is not located in Broward, Dade or Palm Beach Counties)
Reasonably Available Control Technology (RACT) - Lead	62-296.600 through 62-296.605, F.A.C.	X			McDavid Sawmill is not located in a lead nonattainment area or a lead air quality maintenance area.
Reasonably Available Control Technology (RACT)—Particulate Matter	§62-296.700 through 62-296.712, F.A.C.	X			McDavid Sawmill is not located in a PM nonattainment area or a PM air quality maintenance area.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 11 of 11)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Chapter 62-297 - Stationary Sources - Emissions Monitoring					
Purpose and Scope	62-297.100, F.A.C.	X			Contains no applicable requirements.
General Compliance Test Requirements	62-297.310, F.A.C.		X		Specifies general compliance test requirements.
Compliance Test Methods	62-297.401, F.A.C.	X			Contains no applicable requirements.
Supplementary Test Procedures	62-297.440, F.A.C.	X			Contains no applicable requirements.
EPA VOC Capture Efficiency Test Procedures	62-297.450, F.A.C.	X			Not applicable to the McDavid Sawmill.
CEMS Performance Specifications	62-297.520, F.A.C.	X			Contains no applicable requirements.
Exceptions and Approval of Alternate Procedures and Requirements	62-297.620, F.A.C.	X			Exceptions or alternate procedures have not been requested.

[1] - State requirement only; not federally enforceable.

Source: ECT, 1999.

List of Proposed Insignificant Activities

LIST OF PROPOSED INSIGNIFICANT ACTIVITIES

1. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.

2. Vacuum pumps in laboratory operations.

3. Equipment used for steam cleaning.

4. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.

5. Equipment used exclusively for space heating, other than boilers.

6. Laboratory equipment used exclusively for chemical or physical analyses.

7. Brazing, soldering or welding equipment.

8. One or more emergency generators located within a single facility provided:
   a. None of the emergency generators is subject to the Federal Acid Rain Program; and
   b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

9. One or more heating units, general purpose internal combustion engines, or other combustion devices, all of which are located within a single facility, are not listed elsewhere in Rule 62-210.300(3)(a), F.A.C., and are not pollution control devices, provided:
   a. None of the heating units, general purpose internal combustion engines, or other combustion devices that would be exempted is subject to the Federal Acid Rain Program;
   b. Total fuel consumption by all such heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used; and
   c. Fuel for the heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to natural gas, diesel fuel, gasoline and propane.

10. Fire and safety equipment.

LIST OF PROPOSED INSIGNIFICANT ACTIVITIES

11. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:
    a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and
    b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.

12 Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.

13. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.

14. Petroleum lubrication systems.

15. Application of fungicide, herbicide, or pesticide.

16. Non-halogenated solvent storage and cleaning operations, provided the solvents contain none of the hazardous air pollutants listed at Rule 62-210.200, F.A.C.

17. Vehicle refueling operations and associated fuel storage.

18. Storage tanks less than 250 gallons.

19. General plant maintenance shop activities including, but not limited to, welding, grinding, general vehicle repair (excluding air-conditioning systems), welding rod heaters, saw blade grinding and sharpening, and babbitt metal alloy melting pots.

20. Water treatment equipment

21. Any emission unit or activity that would:
    a. Not be subject to any unit-specific applicable requirement.
    b. Neither emit nor have the potential to emit:
        (i) 500 pounds per year or more of lead and lead compounds expressed as lead;
        (ii) 1,000 pounds per year or more of any hazardous air pollutant;
        (iii) 2,500 pounds per year or more of total hazardous air pollutants; or
        (iv) 5.0 tons per year or more of any other regulated pollutant.

EMISSIONS UNIT ADDITIONAL INFORMATION FOR FDEP FORMS

Fuel Analysis from June 1999 Application

Typical Natural Gas Composition

Component	Mole Percent (by volume)
Gas Composition	
Hexane+	0.061
Propane	0.890
I-butane	0.189
N-butane	0.168
I-pentane	0.038
N-pentane	0.026
Nitrogen	0.527
Methane	93.813
CO_2	1.024
Ethane	3.2820
Other Characteristics	
Heat content (HHV)	1,050 Btu/ft^3 at 14.73 psia, dry
Real specific gravity	0.5999
Sulfur content (maximum)	2.0 gr/100 scf

Note: Btu/ft^3 = British thermal units per cubic foot.
psia = pounds per square inch absolute.
gr/100 scf = grains per 100 standard cubic foot.

Source: Koch, 1999.
Champion, 1999.

Description of Control Equipment

Of the three main sources of air pollution at the McDavid mill (boilers, kilns, and planer mill) only the planer mill has add-on control equipment. The emissions from the boiler are minimized due to the nature of the fuel (natural gas) and good combustion practices. The lumber drying kilns at the McDavid mill, like all lumber mills, do not have emissions control equipment. The planer mill, however, is equipped with a cyclone/baghouse combination to minimize particulate emissions.

Emission Inventory Worksheet for Paved Haul Road Emissions

from June 1999 Application

EMISSION INVENTORY WORKSHEET

FUG-PM

Champion International - McDavid Sawmill

EMISSION SOURCE TYPE

FUGITIVE PM - TRUCK TRAFFIC ON PAVED ROADS — **Figure: 2-3**

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM - Truck Traffic on Paved Roads
Emission Control Method(s)/ID No.(s):	Periodic Sweeping and Watering, As Necessary
Emission Point ID:	FUG-PM

EMISSION ESTIMATION EQUATIONS

PM Emission (lb/hr) = 0.082 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/hr

PM Emission (ton/yr) = 0.082 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/yr x (1 ton/2,000 lb)

Source: Section 13.2-1, AP-42, January 1996.

INPUT DATA AND EMISSIONS CALCULATIONS

Silt Loading Factor: 8

Truck Traffic Type	Source ID	Vehicle Miles Traveled (VMT/hr)	Vehicle Miles Traveled (VMT/yr)	Vehicle Weight (ton)	Control Efficiency (%)	Potential Emission Rates (lb/hr)	Potential Emission Rates (tpy)
Raw Material Wood Trucks (Empty)	F-28	3.213	9,524	15.5	90.0	0.76	1.13
Raw Material Wood Trucks (Full)	F-28	3.213	9,524	40.0	90.0	3.16	4.68
Product Lumber Trucks (Empty)	F-29	2.011	4,614	15.5	90.0	0.48	0.55
Product Lumber Trucks (Full)	F-29	2.011	4,614	40.0	90.0	1.98	2.27
Wood By-Product Trucks (Empty)	F-30	2.630	12,981	15.5	90.0	0.62	1.54
Wood By-Product Trucks (Full)	F-30	2.630	12,981	40.0	90.0	2.59	6.38

SOURCES OF INPUT DATA

Parameter	Data Source
Silt Loading Factor	Champion, 1999.
Vehicle Miles Traveled, VMT	Champion, 1999.
Truck Weights, ton	Champion, 1999.
Control Efficiency	Estimated, ECT 1999.

NOTES AND OBSERVATIONS

Truck travel distances (one-way) are 950 ft (log), 2,055 ft (lumber), and 1,970 ft (bark, chips, sawdust, and shavings).

Maximum daily truck counts are 250 (log), 62 (lumber), and 141 (wood by-products).

Maximum hourly VMT based on 14 hrs/dy (log), 12 hrs/dy (lumber), and 20 hrs/dy (wood by-products).

Average annual truck counts are 52,931 (log), 11,856 (lumber), and 34,793 (wood by-products).

DATA CONTROL

Data Collected by:	T. Davis	**Date:**	5/99
Evaluated by:	T. Davis	**Date:**	5/99
Data Entered by:	T. Davis	**Date:**	5/99

EMISSION INVENTORY WORKSHEET

FUG-PM

Champion International - McDavid Sawmill

EMISSION SOURCE TYPE

FUGITIVE PM_{10} - TRUCK TRAFFIC ON PAVED ROADS — **Figure: 2-3**

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM_{10} - Truck Traffic on Paved Roads
Emission Control Method(s)/ID No.(s):	Periodic Sweeping and Watering, As Necessary
Emission Point ID:	FUG-PM

EMISSION ESTIMATION EQUATIONS

PM_{10} Emission (lb/hr) = 0.016 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/hr

PM_{10} Emission (ton/yr) = 0.016 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/yr x (1 ton/2,000 lb)

Source: Section 13.2-1, AP-42, January 1996.

INPUT DATA AND EMISSIONS CALCULATIONS

Silt Loading Factor: 8

Truck Traffic Type	Source ID	Vehicle Miles Traveled (VMT/hr)	Vehicle Miles Traveled (VMT/yr)	Vehicle Weight (ton)	Control Efficiency (%)	Potential Emission Rates (lb/hr)	Potential Emission Rates (tpy)
Raw Material Wood Trucks (Empty)	F-28	3.213	9,524	15.5	90.0	0.15	0.22
Raw Material Wood Trucks (Full)	F-28	3.213	9,524	40.0	90.0	0.62	0.91
Product Lumber Trucks (Empty)	F-29	2.011	4,614	15.5	90.0	0.09	0.11
Product Lumber Trucks (Full)	F-29	2.011	4,614	40.0	90.0	0.39	0.44
Wood By-Product Trucks (Empty)	F-30	2.630	12,981	15.5	90.0	0.12	0.30
Wood By-Product Trucks (Full)	F-30	2.630	12,981	40.0	90.0	0.50	1.24

SOURCES OF INPUT DATA

Parameter	Data Source
Silt Loading Factor	Champion, 1999.
Vehicle Miles Traveled, VMT	Champion, 1999.
Truck Weights, ton	Champion, 1999.
Control Efficiency	Estimated, ECT 1999.

NOTES AND OBSERVATIONS

Truck travel distances (one-way) are 950 ft (log), 2,055 ft (lumber), and 1,970 ft (bark, chips, sawdust, and shavings).

Maximum daily truck counts are 250 (log), 62 (lumber), and 141 (wood by-products).

Maximum hourly VMT based on 14 hrs/dy (log), 12 hrs/dy (lumber), and 20 hrs/dy (wood by-products).

Average annual truck counts are 52,931 (log), 11,856 (lumber), and 34,793 (wood by-products).

DATA CONTROL

Data Collected by:	T. Davis	**Date:**	5/99
Evaluated by:	T. Davis	**Date:**	5/99
Data Entered by:	T. Davis	**Date:**	5/99

Operation and Maintenance Plan

A summary of the Operation and Maintenance Plan for the entire mill has been attached as follows as well as detailed inspection sheets for the Kilns, Planer Mill and Planer Mill Baghouse. For fugitive emissions the Operation and Maintenance Plan is addressed by the attachment included to support the Facility Additional Information titled "Precautions to Prevent Emissions of Unconfined Particulate Matter".

DEAR!

SOME IS EX TASK

STYLE & SOME IN WORK ORDER STYLE.

NINA

OPERATION
AND
MAINTENANCE PLANS

Order	Act	Short text	MWorkCtr	Pgp		
PM72	001	KILNS VISUAL INSPECTION * KILN OPERS	YSK	A01	WKLY	1
PM72	001	BOILER VISUAL INSPECTION * KILN OPERS	YSK	A01	WKLY	1
OM32	001	KILNS DAILY MON THRU SUN INSPECTION	YSK	A01	DAILY	7
PM72	001	PLANER INFEED/BRIDGE INSP-PL SETTERS	PLANER	A01	WKLY	1
PM72	001	PLANER OUTFEED VISUAL INSP-PL SETTERS	PLANER	A01	WKLY	1
PM72	001	PLANER MACHINE VISUAL-PL SETTERS	PLANER	A01	WKLY	1
PM72	001	PLANER MAINT DTIME PLANER SETTERS	PLANER	A01	WKLY	1
PM72	022	BAGHOUSE SYSTEM INSP	PLANER	A01	WKLY	1
PM72	001	PLANER INFEED INSP	PLANER	A01	WKLY	1
PM72	022	BAGHOUSE PHOTOHELIX CHECK-JBODTKE	PLANER	SAF	WKLY	1
PM72	001	PLANER HYD HPU WKLY	PLANER	A01	WKLY	1
OM32	001	BOILER UNIT 1 AND 2 WEEKLY INSPECTION	PLANER	A04	WKLY	1 EACH
OM32	001	BOILER UNIT INSPECTION MON THRU ~~FRI~~ SUN	PLANER	A04	DAILY	7

NINA

I will need the ~~total~~ task PM as written for these jobs.

Thanks

Dean

MAINTENANCE WORK ORDER W/O # 4100740165

Order Type	PM72	**Page 1 of**	8
Act.Type	001-Inspection		05/10/2005-16:20:59
Planner	A01-MECHANICAL	**Created by**	IP1020050505
Funct Loc	6211-02-03		Yard/Kilns
Equipment			
Sort Field			SCHD

KILNS VISUAL INSPECTION * KILN OPERS

S A F E T Y I N S T R U C T I O N S

Refer to job specific ZES/IES procedures and BJAs.

Ensure required permits and documentation are completed.

Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION	RECIPIENT
0010	PLANER	1	05/09/2005	8.0	in operation	

DAILY GENERAL INSPECTION-VISUAL

PERFORM A VISUAL INSPECTION ON EACH OBJECT (FUNCTION LOCATION)

**********LOOK, LISTERN, FEEL AND SMELL**********

[ ] LISTERN FOR UNUSUAL NOISE
[ ] VISUAL CHECK FOR DAMAGES, WEAR AND TEAR OF: BELTS, CHAINS, CONVEYORS AND ALL OTHER THAT APPLY
[ ] VISUAL CHECK FOR ANY IMPROPER OPERATIONS
[ ] VISUAL CHECK FOR DAMAGE, LOOSE OR MISSING GUARDS
[ ] VISUAL CHECK FOR LOOSE OR MISSING BOLTS ON SHAFTS
[ ] VISUAL CHECK VALVES, PUMPS, HOSE CONNECTIONS ECT.
[ ] VISUAL CHECK SCANNERS
[ ] VISUAL CHECK FOR AIR OR FLUID LEAKS
[ ] VISUAL CHECK FOR PROPER LUBRICATIONS
[ ] VISUAL CHECK FOR ANY STRUCTURE DAMAGE OR CORROSIONS
[ ] VISUAL CHECK FOR VIBRATIONS, HIGH TEMPERATURES AND OVERHEATING ON MOTORS, BEARINGS AND GEAR BOXES
[ ] REPORT ANY UNCLEANINESS, BUILD-UP OF DIRT/STOCK
[ ] VISUAL CHECK FOR ANY SAFETY HAZARDS INCLUDING ALL HANDRAILS AND CATWALKS,

PERFORM MINOR REPAIRS OR ADJUSTMENTS IF ABLE.
REPORT REPAIRS THAT COULD NOT BE FIXED AT TIME OF INSPECTION

Material	Description	Qty Req	Bin #	Qty

Emp No.	Hours	Sign-off	Date Comp.

KILN DAILY BASIC CARE-DAY SHIFT

[ ] BLOW DOWN BOILERS AND D.A. TANK
[ ] BLOW OUT STRAINES ON FEED WATER PUMPS
[ ] GAS READINGS TAKEN AND RECORDED
[ ] MOISTURE SAMPLES TAKEN AND RECORDED
[ ] COMPLETE AND FILE KILN/BOILER CHECK SHEET
[ ] INSPECT FOR KILN, BOILER AND FIRE SYSTEM PIPING LEAKS
[ ] WATER CHEMICAL TEST
[ ] PAINT NUMBERS ON PACKS PRIOR TO UNLOADING
[ ] ENTER ALL CHARGES INTO WAGNER
[ ] PACKS UNLOADED RECORDED
[ ] SPRAY FIELD PROCEDURES COMPLETE AND RECORDED
[ ] DAILY BAGHOUSE VISUAL COMPLETE AND READING RECORDED
[ ] BOILER STACK VISUAL OBSERVATION COMPLETE AND RECORDED
[ ] DAILY KILN AND BOILER VISUAL INSPECTIONS COMPLETE AND SIGNED
[ ] CLEAN ASSIGNED KILN AREA
[ ] REPLACE WET BULB SOCKS AS NEEDED
[ ] INSPECT THE WATER DISTRIBUTION CHLORINE PUMP AND ASSOCIATED VAT
[ ] GUARD HOUSE AND SHIPPING SAMPLE DAILY FOR RESIDUAL CHLORINE

KILN DAILY BASIC CARE- NIGHT SHIFT

[ ] BLOW DOWN BOILERS AND D.A. TANK
[ ] MOISTURE SAMPLES TAKEN AND RECORDED
[ ] COMPLETE AND FILE KILN/BOILER CHECK SHEET
[ ] INSPECT FOR KILN, BOILER AND FIRE SYSTEM PIPING LEAKS
[ ] PAINT NUMBERS ON PACKS PRIOR TO UNLOADING
[ ] CHECK BRINE TANK TO ENSURE SALT 1/2 FULL AND WATER 3/4 FULL
[ ] REPLACE WET BULB SOCKS AS NEEDED
[ ] PACKS UNLOADED RECORDED
[ ] CLEAN ASSIGNED KILN AREA
[ ] ENTER ALL CHARGES INTO WAGNER
[ ] INSPECT THE WATER DISTRIBUTION CHLORINE PUMP AND ASSOCIATED VAT

MAINTENANCE WORK ORDER W/O # 4100740167

Order Type PM72	**Page 1 of 7**
Act.Type 001-Inspection	**05/10/2005-16:23:04**
Planner A01-MECHANICAL	**Created by IP1020050505**
Funct Loc 621.1-02-05	**Planermi11**
Funct Loc 621.1-02-05-020	**USNR Planer Process**
Equipment	
Sort Field	**SCHD**

PLANER INFEED/BRIDGE INSP-PL SETTERS

S A F E T Y I N S T R U C T I O N S

Refer to job specific ZES/IES procedures and BJAs.
Ensure required permits and documentation are completed.
Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION RECIPIENT
0010	PLANER	1	05/09/2005	8.0	in operation

DAILY GENERAL INSPECTION-VISUAL

PERFORM A VISUAL INSPECTION ON EACH OBJECT (FUNCTION LOCATION)

**********LOOK, LISTERN, FEEL AND SMELL**********

[ ] LISTERN FOR UNUSUAL NOISE
[ ] VISUAL CHECK FOR DAMAGES, WEAR AND TEAR OF: BELTS, CHAINS, CONVEYORS AND ALL OTHER THAT APPLY
[ ] VISUAL CHECK FOR ANY IMPROPER OPERATIONS
[ ] VISUAL CHECK FOR DAMAGE, LOOSE OR MISSING GUARDS
[ ] VISUAL CHECK FOR LOOSE OR MISSING BOLTS ON SHAFTS
[ ] VISUAL CHECK VALVES, PUMPS, HOSE CONNECTIONS ECT.
[ ] VISUAL CHECK SCANNERS
[ ] VISUAL CHECK FOR AIR OR FLUID LEAKS
[ ] VISUAL CHECK FOR PROPER LUBRICATIONS
[ ] VISUAL CHECK FOR ANY STRUCTURE DAMAGE OR CORROSIONS
[ ] VISUAL CHECK FOR VIBRATIONS, HIGH TEMPERATURES AND OVERHEATING ON MOTORS, BEARINGS AND GEAR BOXES
[ ] REPORT ANY UNCLEANINESS, BUILD-UP OF DIRT/STOCK
[ ] VISUAL CHECK FOR ANY SAFETY HAZARDS INCLUDING ALL HANDRAILS AND CATWALKS,

PERFORM MINOR REPAIRS OR ADJUSTMENTS IF ABLE.
REPORT REPAIRS THAT COULD NOT BE FIXED AT TIME OF INSPECTION

Material	Description	Qty Req	Bin #	Qty

Emp No.	Hours	Sign-off	Date Comp.

MAINTENANCE WORK ORDER W/O # 4100740168

Order Type PM72	**Page 1 of 5**
Act.Type 001-Inspection	**05/10/2005-16:23:05**
Planner A01-MECHANICAL	**Created by IP1020050505**
Funct Loc 6211-02-05	**Planermill**
Funct Loc 6211-02-05-030	**Planer Outfeed**
Equipment	
Sort Field	**SCHD**

PLANER OUTFEED VISUAL INSP-PL SETTERS

S A F E T Y I N S T R U C T I O N S

Refer to job specific EES/IES procedures and BJAs.
Ensure required permits and documentation are completed.
Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION RECIPIENT
0010	PLANER	1	05/09/2005	8.0	in operation

DAILY GENERAL INSPECTION-VISUAL

PERFORM A VISUAL INSPECTION ON EACH OBJECT (FUNCTION LOCATION)

**********LOOK, LISTERN, FEEL AND SMELL**********

[ ] LISTERN FOR UNUSUAL NOISE
[ ] VISUAL CHECK FOR DAMAGES, WEAR AND TEAR OF: BELTS, CHAINS, CONVEYORS AND ALL OTHER THAT APPLY
[ ] VISUAL CHECK FOR ANY IMPROPER OPERATIONS
[ ] VISUAL CHECK FOR DAMAGE, LOOSE OR MISSING GUARDS
[ ] VISUAL CHECK FOR LOOSE OR MISSING BOLTS ON SHAFTS
[ ] VISUAL CHECK VALVES, PUMPS, HOSE CONNECTIONS ECT.
[ ] VISUAL CHECK SCANNERS
[ ] VISUAL CHECK FOR AIR OR FLUID LEAKS
[ ] VISUAL CHECK FOR PROPER LUBRICATIONS
[ ] VISUAL CHECK FOR ANY STRUCTURE DAMAGE OR CORROSIONS
[ ] VISUAL CHECK FOR VIBRATIONS, HIGH TEMPERATURES AND OVERHEATING ON MOTORS, BEARINGS AND GEAR BOXES
[ ] REPORT ANY UNCLEANINESS, BUILD-UP OF DIRT/STOCK
[ ] VISUAL CHECK FOR ANY SAFETY HAZARDS INCLUDING ALL HANDRAILS AND CATWALKS,

PERFORM MINOR REPAIRS OR ADJUSTMENTS IF ABLE.
REPORT REPAIRS THAT COULD NOT BE FIXED AT TIME OF INSPECTION

Material	Description	Qty Req	Bin #	Qty

Emp No.	Hours	Sign-off	Date Comp.

MAINTENANCE WORK ORDER W/O # 4100740174

Order Type	PM72	**Page 1 of**	6
Act.Type	001-Inspection		05/10/2005-16:23:06
Planner	A01-MECHANICAL	**Created by**	IP1020050505
Funct Loc	621-1-02-05		Planermill
Funct Loc	621-1-02-05-020		USNR Planer Process
Funct Loc	621-1-02-05-020-070		Planer Machine
Equipment			
Sort Field	8324		SCHD

PLANER MACHINE VISUAL-PL SETTERS

S A F E T Y I N S T R U C T I O N S

Refer to job specific ZES/IES procedures and BJAs.
Ensure required permits and documentation are completed.
Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION	RECIPIENT
0010	PLANER	1	05/09/2005	8.0	in operation	

DAILY GENERAL INSPECTION-VISUAL

PERFORM A VISJAL INSPECTION ON EACH OBJECT (FUNCTION LOCATION)

**********LOOK, LISTERN, FEEL AND SMELL**********

[ ] LISTERN FOR UNUSUAL NOISE
[ ] VISUAL CHECK FOR DAMAGES, WEAR AND TEAR OF: BELTS, CHAINS, CONVEYORS AND ALL OTHER THAT APPLY
[ ] VISUAL CHECK FOR ANY IMPROPER OPERATIONS
[ ] VISUAL CHECK FOR DAMAGE, LOOSE OR MISSING GUARDS
[ ] VISUAL CHECK FOR LOOSE OR MISSING BOLTS ON SHAFTS
[ ] VISUAL CHECK VALVES, PUMPS, HOSE CONNECTIONS ECT.
[ ] VISUAL CHECK SCANNERS
[ ] VISUAL CHECK FOR AIR OR FLUID LEAKS
[ ] VISUAL CHECK FOR PROPER LUBRICATIONS
[ ] VISUAL CHECK FOR ANY STRUCTURE DAMAGE OR CORROSIONS
[ ] VISUAL CHECK FOR VIBRATIONS, HIGH TEMPERATURES AND OVERHEATING ON MOTORS, BEARINGS AND GEAR BOXES
[ ] REPORT ANY UNCLEANINESS, BUILD-UP OF DIRT/STOCK
[ ] VISUAL CHECK FOR ANY SAFETY HAZARDS INCLUDING ALL HANDRAILS AND CATWALKS,

PERFORM MINOR REPAIRS OR ADJUSTMENTS IF ABLE.
REPORT REPAIRS THAT COULD NOT BE FIXED AT TIME OF INSPECTION

Material	Description	Qty Req	Bin #	Qty

Emp No.	Hours	Sign-off	Date Comp.

PLANER INFEED--DOWNTIME PM

GEARBOXES INSPECTION:

[ ] Bearings-Check inboard, outboard and bearing covers for high operating temperature. Report temp over 160deg.f. Maximum bearing temp should not exceed 180 deg.f.
[ ] Report all vibration 0.3 IPS or above
[ ] Listern for unusual noise-indicates a changed condition in a gear or bearing
[ ] Check for lubrication leaks around sight glass, drain plugs, shaft seals. If applicable check oil level and check the lubricant for contaminaton(milky or gray/brown water may have gotton into the oil
[ ] Check for loose or broken hold down bolts & corrosion
[ ] Clean air filter if appicable
[ ] Check cleanliness of outside gearbox for dirt/stock
[ ] Drive belt-Check drives for tension, squealing, jumping, sheave wobble and mismatched belt. Guard attached.
[ ] Drive Chain-Check sprockets and chain wear, tear and proper tension. Check proper lubrication. Check excessive or unusual noise, chain riding high on teeth, ect.
[ ] Inspect guards for damage and hazard protection, loose bolts and broken brackets

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

MOTORS INSPECTION:

[ ] Check inboard/outboard bearings for overheating/vibration Report temp over 160d and vibration of 0.3 IPS or above
[ ] Listern for unusual noises for the stator/rotor area
[ ] Check for loose or corroded hold down bolts
[ ] Check for damage conduit for flex, box covers.
[ ] Check connection at motor seals for moisture
[ ] No electrical connections are exposed to water
[ ] Check end bell housing for build up of stock, motor under gap is clear. High temp can reduce the motor life by 50%
[ ] Check shaft coupling for damage and grease leaks
[ ] Inspect guard for damage and hazard protection

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

BELT CONVEYORS---IF APPLY

[ ] Check belt for breaks, tears, bad splice, proper tension and tracking
[ ] Check for loose bolts. Look for frozen/damaged troughing, training and return idlers
[ ] Check the head tail and counterweight rolls for bad bearings, buildup on rolls ect.
[ ] Check conveyor frame for cracks, damage or corrosion
[ ] If belt has cleaner-Check setting and wear
[ ] Check any air operated equipment or showers mounted on conveyor for leaks and proper operation
[ ] Check cleanliness of conveyor deck. Are idlers running buried in process build-up, ect.
[ ] Check guard for damage and hazard protection

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

SCREW CONVEYORS---IF APPLY

[ ] Listern for unusual noise--Screw rubbing or housing
[ ] Check for bent shaft(wobble)
[ ] Check inboard and outboard flange mount bearings for high heat and vibration. Report temp over 160deg.f.
[ ] Check bearing locking collars for loosness
[ ] Check the conveyor housing and cover plate for damage, corrosion and stock buildup.
[ ] Check for loose hold down bolts on bearings and foundation
[ ] Check the shaft seals or packing forleakage
[ ] Check duct work for damage, corrosion, proper hangers

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

CONVEYOR CHAINS--IF APPLY

[ ] Check for proper lubrication
[ ] Check for links coming apart
[ ] Check for chains tracking on all sprockets evenly
[ ] Check all sprockets for excessive wear
[ ] Check tracks for wear --if chains run in tracks
[ ] Check lubrication lines attached and working
[ ] Guards are in proper order-all safety equip apply

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

BAGHOUSE MAINT INSPECTION- DN TIME

GENERAL INSPECTION

GEARBOXES INSPECTIONS:

[ ] Bearings-Check inboard, outboard and bearing covers for high operating temperature. Report temp over 160deg.f. Maximum bearing temp should not exceed 180 deg.f.
[ ] Report all vibration 0.3 IPS or above
[ ] Listern for unusual noise-indicates a changed condition in a gear or bearing
[ ] Check for lubrication leaks around sight glass, drain plugs, shaft seals. If applicable check oil level and check the lubricant for contaminaton(milky or gray/brown water may have gotton into the oil
[ ] Check for loose or broken hold down bolts & corrosion
[ ] Clean air filter if appicable
[ ] Check cleanliness of outside gearbox for dirt/stock
[ ] Drive belt-Check drives for tension, squealing, jumping, sheave wobble and mismatched belt. Guard attached.
[ ] Drive Chain-Check sprockets and chain wear, tear and proper tension. Check proper lubrication. Check excessive or unusual noise, chain riding high on teeth, ect.
[ ] Inspect guards for damage and hazard protection, loose bolts and broken brackets

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

MOTOR INSPECTION:

[ ] Check inboard/outboard bearings for overheating/vibration Report temp over 160d and vibration of 0.3 IPS or above
[ ] Listern for unusual noises for the stator/rotor area
[ ] Check for loose or corroded hold down bolts
[ ] Check for damage conduit for flex, box covers.
[ ] Check connection at motor seals for moisture
[ ] No electrical connections are exposed to water
[ ] Check end bell housing for build up of stock, motor under gap is clear. High temp can reduce the motor life by 50%
[ ] Check shaft coupling for damage and grease leaks
[ ] Inspect guard for damage and hazard protection

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

CONVEYOR INSPECTION-----(DRY SHAVING BIN)

[ ] CHECK FOR UNUSUAL NOISE-SCREW RUBBING OR HOUSING
[ ] CHECK FOR BENT SHAFT (WOBBLE)
[ ] CHECK DUCT WORK FOR DAMAGE, CORROSION, PROPER HANGERS

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

AIR LOCKS INSPECTION:

[ ] CHECK INBOARD AND OUTBOARD BEARINGS FOR OVERHEATING AND VIBRATION. REPORT ALL TEMPERATURES OVER 160deg F. REPORT ALL VIBRATION READINGS .3 IPS AND ABOVE
[ ] LISTERN FOR UNUSUAL SCRAPING NOISES COMING FROM THE ROTOR HOUSING AREA
[ ] CHECK HOLD DOWN BOLTS

[ ] CHECK THE DUCT & BLOW PIPE FOR LEAKAGE, PLUGGAGE OR DAMAGE
TO BE PERFORM WHILE MILL IS DOWN

SWEEP ARM INSPECTION--NEED TO OPEN THE BAGHOUSE AND CLEAN IT OUT

[ ] CHECK/CLEAN AIR DISTRIBUTION AND CONDITION
[ ] CHECK/CLEAN CHANNEL SUPPORT FOR CRACKS
[ ] CHECK/CLEAN BEARINGS AND GREASE FOR NOZZLE ARM
[ ] CHECK/CLEAN AND TENSION CHAIN
[ ] CHECK/CLEAN SPROCKETS FOR WEAR
[ ] CHECK/CLEAN GEAR REDUCER OIL LEVEL
[ ] CHECK/CLEAN FAN MOTOR MOUNTING BOLTS
[ ] CHECK/CLEAN FAN CONDITION

MAINTENANCE WORK ORDER W/O # 4100740225

Order Type	PM72	**Page 1 of**	16
Act.Type	001-Inspection		05/10/2005-16:23:07
Planner	A01-MECHANICAL	**Created by**	IP1020050505
Funct Loc	621-1-02-05		Planermill
Funct Loc	621-1-02-05-020		USNR Planer Process
Funct Loc	621-1-02-05-020-070		Planer Machine
Equipment			
Sort Field	8324		SCHD

PLANER MAINT INSP-PLANER SETTERS

S A F E T Y I N S T R U C T I O N S

Refer to job specific ZES/IES procedures and BJAs.
Ensure required permits and documentation are completed.
Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION RECIPIENT
0010	PLANER	1	05/09/2005	5.0	not in oper.

PLANER MAINT INSP--DOWNTIME

GENERAL INSPECTION

[ ] Check machine alignment and make necessary adjustments weekends.
[ ] Air clean the underside of the machine and thoroughly inspect for loose nuts, bolts and worn parts.
[ ] Thoroughly air clean the stators (weekends)
[ ] Air clean the vertical motors through the air vents (do not remove the end bells).
[ ] Raise, then lower heads to their maximum positions of travel.

GEARBOXES INSPECTION:

[ ] Bearings-Check inboard, outboard and bearing covers for high operating temperature. Report temp over 160deg.f. Maximum bearing temp should not exceed 180 deg.f.
[ ] Report all vibration 0.3 IPS or above
[ ] Listern for unusual noise-indicates a changed condition in a gear or bearing
[ ] Check for lubrication leaks around sight glass, drain plugs, shaft seals. If applicable check oil level and check the lubricant for contaminaton(milky or gray/brown water may have gotton into the oil
[ ] Check for loose or broken hold down bolts & corrosion
[ ] Clean air filter if appicable
[ ] Check cleanliness of outside gearbox for dirt/stock
[ ] Drive belt-Check drives for tension, squealing, jumping, sheave wobble and mismatched belt. Guard attached.
[ ] Drive Chain-Check sprockets and chain wear, tear and proper tension. Check proper lubrication. Check excessive or unusual noise, chain riding high on teeth, ect.
[ ] Inspect guards for damage and hazard protection, loose bolts and broken brackets

PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

MAINTENANCE WORK ORDER W/O # 4100740225

Order Type PM72 **Page 2 of 16**
Act.Type 001-Inspection **05/10/2005-16:23:07**

MOTORS INSPECTION:

[ ] Check inboard/outboard bearings for overheating/vibration
Report temp over 160d and vibration of 0.3 IPS or above
[ ] Listern for unusual noises for the stator/rotor area
[ ] Check for loose or corroded hold down bolts
[ ] Check for damage conduit for flex, box covers.
[ ] Check connection at motor seals for moisture
[ ] No electrical connections are exposed to water
[ ] Check end bell housing for build up of stock, motor under gap is clear. High temp can reduce the motor life by 50%
[ ] Check shaft coupling for damage and grease leaks
[ ] Inspect guard for damage and hazard protection
PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

BELT CONVEYORS---IF APPLY

[ ] Check belt for breaks, tears, bad splice, proper tension and tracking
[ ] Check for loose bolts. Look for frozen/damaged troughing, training and return idlers
[ ] Check the head tail and counterweight rolls for bad bearings, buildup on rolls ect.
[ ] Check conveyor frame for cracks, damage or corrosion
[ ] If belt has cleaner-Check setting and wear
[ ] Check any air operated equipment or showers mounted on conveyor for leaks and proper operation
[ ] Check cleanliness of conveyor deck. Are idlers running buried in process build-up, ect.
[ ] Check guard for damage and hazard protection
PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

SCREW CONVEYORS---IF APPLY

[ ] Listern for unusual noise--Screw rubbing or housing
[ ] Check for bent shaft(wobble)
[ ] Check inboard and outboard flange mount bearings for high heat and vibration. Report temp over 160deg.f.
[ ] Check bearing locking collars for loosness
[ ] Check the conveyor housing and cover plate for damage, corrosion and stock buildup.
[ ] Check for loose hold down bolts on bearings and foundation
[ ] Check the shaft seals or packing forleakage
[ ] Check duct work for damage, corrosion, proper hangers
PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

CONVEYOR CHAINS--IF APPLY

[ ] Check for proper lubrication
[ ] Check for links coming apart
[ ] Check for chains tracking on all sprockets evenly
[ ] Check all sprockets for excessive wear
[ ] Check tracks for wear --if chains run in tracks
[ ] Check lubrication lines attached and working
[ ] Guards are in proper order-all safety equip apply
PERFORM REPAIRS OR ADJUSTMENT IF TIME PERMITS

PLANER TOP ARBOR ASSEMBLY
MOTOR

MAINTENANCE WORK ORDER W/O # 4100740231

Order Type	PM72	**Page 1 of**	1
Act.Type	022-Environmental		05/10/2005-16:24:23
Planner	SAF-SAFETY	**Created by**	IP1020050505
Funct Loc	6211-02-08		Planer Mill Residuals
Funct Loc	6211-02-08-060		Shavings Blowpipe System, Baghouse
Equipment			
Sort Field	83424	**SCHD**	

BAGHOUSE PHOTOHELIX CHECK-JBODTKE

S A F E T Y I N S T R U C T I O N S

Refer to job specific HES/IES procedures and BJAs.

Ensure required permits and documentation are completed.

Refer any questions to supervisor or safety office.

[ ] VERIFY ALL SAFETY GUARDS ARE RE-INSTALLED AFTER ANY REPAIRS OR PM INSPECTIONS

OPER	WORK CENTER	# PEOPLE	START DATE	EST.TIME WORK	SYSTEM CONDITION RECIPIENT
0010	PLANER	1	05/09/2005	0.5	not in oper.

BAGHOUSE PHOTOHELIX CHECK

GENERAL INSPECTION

[ ] Check Photohelix for inches of water - should be 1" to 3"
NOTE: 3" to 4" indicates Caution

Material	Description	Qty Req	Bin #	Qty

Emp No.	Hours	Sign-off	Date Comp.

Object List

Funct Loc.	Description
6211-02-08-060	Shavings Blowpipe System, Baghouse
83424	

End of report

PLANER HPU WEEKLY INSPECTION-

VISUAL INSPECT:
[ ] CHECK HYD PUMPS FOR LEAKS
[ ] Check SUCTION AND PRESSURE LINES FOR LEAKS
[ ] Check RETURN LINES AND FILTER CANISTERS FOR LEAK
[ ] LISTEN/NOTE UNUSAL NOISES:CAVITATION, PRESSURE SURGING, PUMP
[ ] BLOW DOWN HPU UNIT TO INCLUDE HEAT EXCHANGER

MAINTENANCE RECORD FINDINGS
[ ] HUP TANK LEVEL IN INCHES _____
[ ] HPU TANK TEMPERATURE _____
[ ] PRESSUE PUMP OPERATING TEMP--145 & ABOVE EXCESSIVE _____
[ ] LINE TEMPERATURE FROM RETURN SIDE OF HEAT EXCHANGER _____
[ ] SPILL CONTAINMENT LEVEL _____
WRITE NOTIFICATION OF REMOVAL IF NECESSARY #_____

APPENDIX C

Potential to Emit Calculations

Potential to Emit Calculations

Kilns

VOC emissions based on using the emission factor of 2.84 lb/MBF and the 250,000 MBF maximum design production rate. Particulate emissions based on using the emission factor of 0.037 lb/MBF and the same maximum design production rate.

Planer Mill

The annual PM emissions for the Planer Mill are based on a grain loading rate of 0.004 grains/SCF at a flowrate of 60,000 SCFM for the cyclone/baghouse.

The two-year actual emissions are based on using the actual hours of operation at the same grain loading flowrate provided above. The potential to emit takes into account that the baghouse is currently the only point of emissions and is based on 8,760 hours per year operation.

Air Toxics

The only air toxics that will be emitted will be from the drying kilns. The emissions of air toxics have been based on the design capacity of 250,000 MBF and the emission factor based on testing similar kilns for each air toxic that is expected to be emitted. The emission factors are as follows:

Acetaldehyde – 0.0095 lb/MBF Acrolein – 0.006 lb/MBF Formaldehyde – 0.01 lb/MBF Methanol – 0.24 lb/MBF Propionaldehyde – 0.001 lb/MBF

APPENDIX D

Correspondence Between International Paper and FDEP

Letter to Kevin White, P.E. (FDEP) dated April 23, 2004

INTERNATIONAL PAPER

401 CHAMPION DRIVE
MCDAVID FL 32558

April 23, 2004

Mr. Kevin White, P.E.
Air Resources Management
Department of Environmental Protection
160 Government Center
Pensacola, FL 32502-5794

Re: International Paper-McDavid Lumber Mill
Install Log Singulator and Gang Saw Modifications

Dear Mr. White:

On March 16, 2004 I spoke to you regarding International Paper's plans to install a log singulator and modify the gang saws at our McDavid Lumber Mill. This conversation was in reference to letters dated March 9 and March 12, 2004 that were sent to Mr. Blair Burleson to notify the department of these proposals to install the log singulator and modify the gang saws. FDEP responded to these requests in a letter dated March 26, 2004.

During our conversation you indicated that the projects proposed for the mill could require the need for a Prevention of Significant Deterioration (PSD) Review and suggested that I contact Mr. John Reynolds in the department's Tallahassee office. After speaking briefly to Mr. Reynolds about the situation I decided that I should obtain assistance from someone who was more familiar with the PSD program and contracted the assistance of one of our consultants, Mr. Barry Andrews (RTP Environmental Associates).

Upon reviewing the proposed projects and analyzing the history of operation, Mr. Andrews concluded that provisions contained in the PSD regulations would either exempt these projects from PSD review or allow for the projects to be evaluated on a potential to potential increase in emissions basis which would not result in a significant increase in emissions, thereby not triggering PSD review. The results of Mr. Andrews review were communicated in a telephone conversation held with Mr. Reynolds and representatives of International Paper on April 20, 2004. Mr. Reynolds agreed with Mr. Andrews that the unique circumstances pertaining to the mill and these projects would justify the projects to be permitted without PSD review. A summary of the findings that justify this exemption is provided below.

McDavid Lumber Mill Operation

The McDavid lumber mill, which was permitted as a new facility on September 9, 1999, was initially owned and operated by Champion International Corporation. International Paper subsequently acquired the mill and the permit was transferred to International Paper on March 21, 2001. When initially permitted the mill was subject to PSD review and the quantity of lumber processed through the kilns (all kilns combined) was limited to 225 million board feet per any consecutive 12-month period. The potential to emit VOC associated with this production level from all kilns combined is estimated to be 319.5 tons per year, which causes the mill to be classified as a major source in accordance with the PSD regulations.

Nature of Proposed Modifications

As indicated in the March 9 and March 12, 2004 letters, the primary reason for the proposed log singulator and gang saw projects is to reduce the amount of downtime that is currently experienced at the mill. Since the mill is essentially a new facility, both projects are proposed with the intent of allowing the mill to operate at its design capacity and not to increase production beyond original design levels.

Although the mill was new when acquired from Champion International, it has been International Paper's experience that the much of the equipment used to process lumber was designed such that repairs require substantial downtime or have resulted in the need for frequent repairs, which have decreased the production of lumber below anticipated levels. International Paper's intention with the proposed projects is to replace existing equipment with equipment that is common to mills that were originally designed by International Paper. As this is the case, the equipment replacement can be viewed as being more of a "like-kind" replacement rather than equipment replacement that would serve to increase production capacity. This ongoing process of identifying and fixing problems with the original mill design is reflected in the continuous ramping up of the annual production rate since the mill began operation in January 2001. At the end of the initial 12-month operating period the cumulative production rate dried in the kilns was approximately 88 million board feet. This increased to 154 million board feet by the end of 2002 and to 173 million board feet by the end of 2003. The production has continued to increase during the first quarter of 2004. The 3-month production rate through the kilns was approximately 50 million board feet. Assuming this level could be maintained throughout the year the cumulative production rate for the 12-month period would be approximately 200 million board feet. This demonstrates that since beginning operation in January 2001 the production level has steadily increased and will continue to increase until reaching the permitted level of 225 million board feet.

Findings

A review of the PSD regulations indicates that the provisions clearly would allow for the projects proposed for the McDavid mill to be exempt from PSD review. Specifically, the review indicated that given the unique circumstances associated with the McDavid mill the projects would be exempt for any of the following reasons.

1. The facility had already been subject to PSD review in 1999.

2. The modifications proposed could be considered to be a "like-kind" replacement and be addressed by the routine maintenance, repair and replacement exclusion.

3. The facility has not yet reached the level of production since beginning operation that would be considered to be representative of normal operation.

Of the reasons stated above that would exempt the proposed projects from PSD review the data would clearly indicate that since the production level at the mill has steadily increased since beginning operation in January 2001, that the level of production that is considered to be representative of normal operation has not been reached. This becomes an important factor since the PSD regulations have provisions to allow the use of current potential to emit as compared to future potential to emit to determine if a significant increase in emissions has occurred.

Paragraph (11) of Section 200 of Chapter 62-210, F.A.C. provides the definition of actual emissions as follows:

(11) "Actual Emissions" – The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

(a) *In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which proceeds the particular date and which is representative of the normal operation of an emissions unit. The Department may allow the use of a different time period upon a determination that is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*

(b) *The Department may presume that the unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emission limits are federally enforceable.*

In view of the definition of "Actual Emissions" provided above, and the unique circumstances outlined in this letter, the Department clearly has justification for considering the proposed projects to be evaluated using the unit-specific (kilns) allowable emissions as being equivalent to the actual emissions of the emissions unit. The actual emissions for the kilns (all kilns combined) would then become the permitted and federally enforceable emissions limit of 319.5 tons per year. Since there is no intention to operate the McDavid mill above the 225 million board feet level during any consecutive 12-month period the future potential to emit would also be 319.5 tons per year, resulting in no net emissions increase. The proposed projects would then be clearly exempt from PSD review and there would also be justification for approving the project without the need to modify the current Title V permit (i.e., there are no permit conditions in the current Title V permit that would need to be modified to accommodate the proposed projects)

This concludes our response to FDEP's March 26, 2004 letter. If you have any questions or need additional information please contact me at (850) 587-1084.

Sincerely,

Dearl Hilyer,
Site EHS Manager

cc: Mr. John Reynolds, FDEP Tallahassee Office

APPENDIX E

Abbreviations/Acronyms

Abbreviations/Acronyms

Compounds

CO	-	carbon monoxide
NO_x	-	nitrogen oxides
O_2	-	oxygen
O_3	-	ozone
Pb	-	lead
PM	-	particulate matter
PM-10	-	particulate matter with diameters less than 10 microns
SO_2	-	sulfur dioxide
VOC	-	volatile organic compounds

Units

acfm	-	actual cubic feet per minute
Btu	-	British thermal unit
°F	-	degrees Fahrenheit
ft	-	feet
ft/s	-	feet per second
gr/dscf	-	grains/dry standard cubic foot
hr	-	hour
km	-	kilometer
lb	-	pound
MBF	-	thousand board feet
MM	-	million
ppm	-	parts per million
ppmw	-	parts per million weight
psi	-	pounds per square inch
psia	-	pounds per square inch absolute
scf	-	standard cubic feet
scfd	-	standard cubic feet per day
tpy	-	tons per year
$\mu g/m^3$	-	micrograms per cubic meter

Other

AQRV	-	air quality-related values
BACT	-	best available control technology
BPIP	-	Building Profile Input Program

Other Continued

EPA	-	Environmental Protection Agency
FDEP	-	Florida Department of Environmental Protection
GEP	-	Good Engineering Practice
ISC	-	Industrial Source Complex Dispersion Model
ISCLT	-	Industrial Source Complex Dispersion Model (Long-Term)
ISCST	-	Industrial Source Complex Dispersion Model (Short-Term)
LAER	-	Lowest Achievable Emission Rate
MACT	-	Maximum Achievable Control Technology
NAAQS	-	National Ambient Air Quality Standards
NESHAPS	-	National Emission Standards for Hazardous Air Pollutants
NSPS	-	New Source Performance Standards
NSR	-	New Source Review
PSD	-	Prevention of Significant Deterioration