



NORTH FLORIDA LUMBER

May 22, 2009

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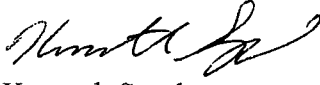
Susan Devon
Department of Environmental
Bureau of Air Regulation
New Source review Section
Bob Martinez Building, MS #5500
Tallahassee, Florida 32399-2400

RECEIVED
MAY 26 2009
BUREAU OF AIR REGULATION

**RE: PSD Fee
North Florida Lumber, Inc.
Facility ID# 0770007**

Ms. Susan the Department of Environmental has received North Florida Lumber PSD application. The application Fee was not included; you will find a check in the amount of \$7,500.00 written to the Department of Environmental from North Florida Lumber, Inc. for the PSD Fees. If you have any questions, please contact Jackie Cornell at 850- 447-4722.

Sincerely,


Kenneth Sparks
General Manager

cc: Jackie Cornell

Main Office:
Post Office Box 7
Graceville, Florida 32440
850-263-4457
Fax 850-263-3875

Mill Office:
P.O. Box 610
Bristol, Florida 32321
850-643-2238
Fax 850-643-5930

Sales Office:
P.O. Box 610
Bristol, Florida 32321
850-643-2172
Fax 850-643-2501

**APPLICATION FOR TITLE V
CONSTRUCTION PERMIT
PREVENTION OF SIGNIFICANT DETERIORATION
NORTH FLORIDA LUMBER, INC.
BRISTOL SAWMILL
HIGHWAY 12 SOUTH
BRISTOL, LIBERTY COUNTY, FLORIDA 32321
FACILITY I.D. 0770007**

MAY 6, 2009

SUBMITTED TO:

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
BUREAU OF AIR REGULATION
NEW SOURCE REVIEW SECTION
BOB MARTINEZ BUILDING, MS #5500
TALLAHASSEE, FLORIDA 32399-2400**

RECEIVED

MAY 19 2009

BUREAU OF AIR REGULATION

**PREPARED BY:
GMR & ASSOCIATES, INC.
2520 N.W. 39TH STREET, SUITE 200
OKLAHOMA CITY, OKLAHOMA 73112
(405) 528-7017 / FAX (405) 528-3346**

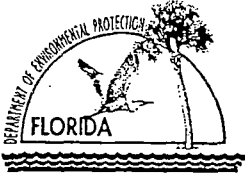
**APPLICATION FOR TITLE V
CONSTRUCTION PERMIT
PREVENTION OF SIGNIFICANT DETERIORATION
NORTH FLORIDA LUMBER, INC.
BRISTOL, LIBERTY COUNTY, FLORIDA 32321
FACILITY I.D. 0770007**

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Application for Construction Permit – Long Form

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- I Rule Applicability Analysis and Identification of Applicable
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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 any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

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

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: North Florida Lumber, Inc.	
2. Site Name: Bristol Sawmill	
3. Facility Identification Number: 0770007	
4. Facility Location.. Highway 12 South Street Address or Other Locator: City: Bristol County: Liberty Zip Code: 32321	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Allan J. Hartlein	
2. Application Contact Mailing Address Organization/Firm: GMR & Associates, Inc. Street Address: 2520 N.W. 39 th Street, Suite 200 City: Oklahoma City State: OK Zip Code: 73112	
3. Application Contact Telephone Numbers... Telephone: (405) 528 - 7017 ext. 306. Fax: (405) 528 - 3346	
4. Application Contact E-mail Address: ahartlein@gmrinc.net	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5/24/09	3. PSD Number (if applicable): 407
2. Project Number(s): 0770007-014-A	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

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

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

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

Applicant requests authorization to expand production capacity of existing permitted lumber drying Kiln Nos. 1, 2, 3 and 4, currently operated under Operating Permit # 0770007-012-AV.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
015	Steam-heated lumber drying Kiln Nos. 1, 2, 3 & 4	AC1B	


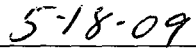
Application Processing Fee

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: North Florida Lumber, Inc.
2. Owner/Authorized Representative Mailing Address... Organization/Firm: North Florida Lumber, Inc. Street Address: Highway 12 South City: Bristol State: FL Zip Code: 32321
3. Owner/Authorized Representative Telephone Numbers... Telephone: (850) 643 - 2238 ext. Fax: (850) 643 - 5930
4. Owner/Authorized Representative E-mail Address: <u>ksparks@rexnfl.com</u>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  Signature  Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name: Kenny Sparks

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, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address...

Organization/Firm: North Florida Lumber, Inc.
Street Address: P. O. Box 610
City: Bristol State: FL Zip Code: 32321

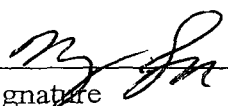
4. Application Responsible Official Telephone Numbers...

Telephone: (850) 643 - 2238 ext. Fax: (850) 643 - 5930

5. Application Responsible Official E-mail Address: ksparks@rexnfl.com

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  Date 5-18-09

Professional Engineer Certification

1. Professional Engineer Name: Edward A. Harris, P.E.
Registration Number: 44503

2. Professional Engineer Mailing Address...
Organization/Firm: Ed Harris PE Services
Street Address: 798 Ridge Road
City: Heber Springs State: AR Zip Code: 72543

3. Professional Engineer Telephone Numbers...
Telephone: (501) 206 - 0194 ext. Fax: (501) 206-0194

4. Professional Engineer Email Address: edharrispe@suddenlink.net

5. Professional Engineer Statement:

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

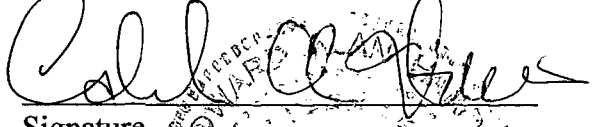
(1) *To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant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

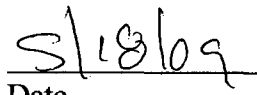
(4) *If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further 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.*



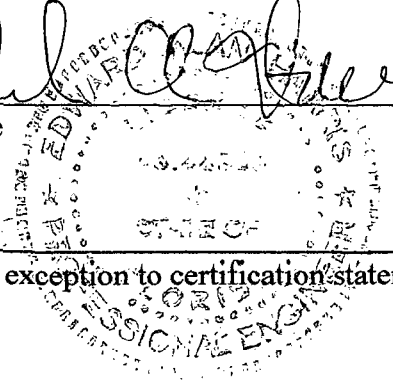
Signature

(seal)



Date

* 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) North (km)	2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30° 20' 50" Longitude (DD/MM/SS) 84° 59' 10"		
3. Governmental Facility Code:	4. Facility Status Code: A	5. Facility Major Group SIC Code: 24	6. Facility SIC(s): 2421
7. Facility Comment : Construction permit application to expand production capacity by more efficient use of heat input at existing permitted lumber drying Kiln Nos. 2, 3 & 4.			

Facility Contact

1. Facility Contact Name: Kenny Sparks
2. Facility Contact Mailing Address... Organization/Firm: North Florida Lumber, Inc. Street Address: Highway 12 South <div style="display: flex; justify-content: space-between; margin-top: 10px;"> City: Bristol State: FL Zip Code: 32321 </div>
3. Facility Contact Telephone Numbers: Telephone: (850) 643 - 2238 ext. Fax: (850) 643 - 5930
4. Facility Contact E-mail Address: ksparks@rexnfl.com

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: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> City: State: Zip Code: </div>
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official E-mail 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. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: Construction Permit application subject to Prevention of Significant Deterioration	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
CO	A	N
NOx	A	N
VOC	A	N
PM	A	Y
PM ₁₀	A	N
SO ₂	A	N
Methanol	A	N
Total HAP	A	N

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

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1. Facility UTM Coordinates... Zone 16 East (km) North (km)		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30° 20' 50" Longitude (DD/MM/SS) 84° 59' 10"	
3. Governmental Facility Code:	4. Facility Status Code: A	5. Facility Major Group SIC Code: 24	6. Facility SIC(s): 2421
7. Facility Comment : Construction permit application to expand production capacity by more efficient use of heat input at existing permitted lumber drying Kiln Nos. 2, 3 & 4.			

Facility Contact

1. Facility Contact Name: Kenny Sparks
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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 E-mail Address:

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's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
PM		002		37.58	RULE

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

EUG 002 (Boiler No. 2) limited by FAC 62.296.410(2)(b)(2) to 0.2 lb PM / MMBTU / HR.
 Emissions cap mass balance calculation:

$$\frac{42.9 \text{ MMBTU}}{\text{hr}} \times \frac{0.2 \text{ lb. PM}}{\text{MMBTU}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 37.58 \text{ tons PM / YR}$$

Boiler No. 2 (E.U. 002) was installed prior to June 1989.

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

<p>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)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: C _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>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)</p> <p><input checked="" type="checkbox"/> Attached, Document ID: D _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>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)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>

Additional Requirements for Air Construction Permit Applications

<p>1. Area Map Showing Facility Location:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)</p>
<p>2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):</p> <p><input checked="" type="checkbox"/> Attached, Document ID: A, F _____</p>
<p>3. Rule Applicability Analysis:</p> <p><input checked="" type="checkbox"/> Attached, Document ID: I _____</p>
<p>4. List of Exempt Emissions Units:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)</p>
<p>5. Fugitive Emissions Identification:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
 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: J 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: K
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 Onsite 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

EMISSIONS UNIT INFORMATION

Section [2] of [2]

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:
Lumber Drying Kiln Nos. 1, 2, 3 and 4.

3. Emissions Unit Identification Number: 015

4. Emissions Unit Status Code: C	5. Commence Construction Date: July 2009	6. Initial Startup Date: Sept. 2009	7. Emissions Unit Major Group SIC Code: 24	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit: Manufacturer:
Kiln No. 2: Steam-heated continuous lumber drying kiln, Windsor Technology, Custom Build, to be converted to Triple-Length Continuous (TLC) kiln, 3 times length of existing Kiln No. 2.
Production at existing Kilns 3 & 4 to be increased without physical modification.

10. Generator Nameplate Rating: N/A

Emissions Unit Comment: Kiln No. 2 will be modified by lengthening it to approximately three (3) times its original length, from 85 to 227 feet long. Maximum lumber production capacity at Kiln No. 2 will increase from 59,000,000 board-feet per year to 92,000,000 board-feet per year.
Utility pole drying at Kiln Nos. 3 & 4 to be increased from 777,359 cu. ft/yr to 1,500,000 cu ft/yr. without physical modifications.
Facility-wide lumber drying capacity will increase from the currently permitted limit of 143 MMBFY equivalent to 176 MMBFY equivalent.

EMISSIONS UNIT INFORMATION

Section [2] of [2]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 20,091 bd-ft equivalent/hr for EU 015 Kiln No. 1 66,000,000 board-feet/yr (unchanged) Kiln No. 2 92,000,000 board-feet lumber dried/yr as-modified Kiln No. 3 9,000,000 board-feet/yr (750,000 cubic feet x 12 bd-ft/cu-ft) Kiln No. 4 9,000,000 board-feet/yr (750,000 cubic feet x 12 bd-ft/cu-ft) Total for EU 015:as-modified: 176,000,000 board-feet lumber/yr
2. Maximum Production Rate: 176,000,000 board-feet equivalent/year facility-wide
Maximum Heat Input Rate: N/A. Process heat externally provided by Boilers Nos. 1, 2 and 3.
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: Kiln No. 2 production capacity increase from 59,000,000 to 92, 000,000 board-feet per year (59.0 MMBFY to 92.0 MMBFY) by lengthening existing Kiln No. 2 to three times its current length, and by converting it from batch process to continuous operation. Increase wood utility pole drying capacity at existing Kiln Nos. 3 and 4 from 777, 359 cubic feet per year to 1,500,000 cubic feet per year <i>without</i> physical modifications. Facility-wide production capacity increase from 143 MMBFY to 176 MMBFY.

EMISSIONS UNIT INFORMATION

Section [2] of [2]

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: Kiln No. 2		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Kiln No. 2: two (2) open doorways, 12 feet wide x 15.5 feet high			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: F	6. Stack Heights: N/A		7. Exit Diameters: N/A
8. Exit Temperature: 150 °F	9. Actual Volumetric Flow Rate:	10. Water Vapor:	
11. Maximum Dry Standard Flow Rate:		12. Nonstack Emission Point Height: 15.5 ft.	
13. Emission Point UTM Coordinates... Zone: 16 East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) 30° 20' 50" Longitude (DD/MM/SS) 84° 59' 10"	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [2] of [2]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Not applicable. No fuel consumed at EU 015. Process heat provided by steam generated at Boilers Nos. 1 and 3 (EU 001) and Boiler No. 2 (EU 002).		
2. Source Classification Code (SCC):		2. SCC Units N/A
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment:		

EMISSIONS UNIT INFORMATION POLLUTANT DETAIL INFORMATION

Section [2] of [2]

Page [1] of [3]

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS****(Optional for unregulated emissions units.)****Potential, Estimated Fugitive, and Baseline & Projected Actual 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: 0	
3. Potential Emissions: 96.5 lb/hour 422.67 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): tons/year			
6. Emission Factors: $VOC_{Total} =$ 4.644 lb VOCP as propane / 1000 bd-ft. dried (wood drying) + 0.103 lb Formaldehyde / 1000 bd-ft dried + 0.36 x 0.161 lb Methanol / 1000 bd-ft dried References: AP-42, Sept. 2003: Table 1.6-3 (wood waste combustion) TAPPI Technical Bulletin 845 (wood drying) & FDEP-NWO guidance letter, October 17, 2008.			7. Emissions Method Codes: 3 & 5
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): 422.67 tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Kiln No. 1: $66,000,000 \text{ bd-ft/yr} \times (4.644 \text{ lb VOCP}/1000 \text{ bd-ft} + 0.103 \text{ lb Formaldehyde} / 1000 \text{ bd-ft} + 0.36 \times 0.161 \text{ lb Methanol} / 1000 \text{ bd-ft}) / 2000 \text{ lb/ton} =$ 158.57 tons/yr VOC_{Total} (wood drying) Kiln No. 2 (as-modified): $92,000,000 \text{ bd-ft/yr} \times (4.644 \text{ lb VOCP}/1000 \text{ bd-ft} + 0.103 \text{ lb Formaldehyde} / 1000 \text{ bd-ft} + 0.36 \times 0.161 \text{ lb Methanol} / 1000 \text{ bd-ft}) / 2000 \text{ lb/ton} =$ 221.03 tons/yr VOC_{Total} (wood drying) Kilns Nos. 3 & 4 $1,500,000 \text{ cu-ft/yr} \times 12 \text{ bd-ft/cu-ft} \times (4.644 \text{ lb VOCP}/1000 \text{ bd-ft} + 0.103 \text{ lb Formaldehyde} / 1000 \text{ bd-ft} + 0.36 \times 0.161 \text{ lb Methanol} / 1000 \text{ bd-ft}) / 2000 \text{ lb/ton} =$ 43.25 tons/yr VOC_{Total} (wood drying) EU 015 Total = $158.57 + 221.03 + 43.25 = 422.85 \text{ tons/yr } VOC_{Total}$			
11. Potential, Fugitive, and Actual Emissions Comment: $VOC_{Total} = VOCP + \text{Formaldehyde} + \{0.36 \times \text{Methanol}\} = 4.805 \text{ lb } VOC_{Total} / 1000 \text{ bd-ft}$ dried, per FDEP guidance document dated October 17, 2008.			

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual 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: Methanol	2. Total Percent Efficiency of Control: 0
3. Potential Emissions: 3.24 lb/hour 14.17 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): tons/year	
6. Emission Factor: 0.161 lb Methanol / 1000 bd-ft lumber dried Reference: TAPPI Technical Bulletin 845	7. Emissions Method Code: 5
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): 14.17 tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: Kiln No. 1: 66,000,000 bd-ft x 0.161 lb Methanol / 1000 bd-ft / 2000 lb/ton = 5.31 tons/yr Methanol Kiln No 2 (as-modified): 92,000,000 bd-ft x 0.161 lb Methanol/1000 bd-ft / 2000 lb/ton = 7.41 tons/yr Methanol Kilns Nos. 3:& 4: 1,500,00 cu-ft x 12 bd-ft/cu-ft x 0.161 lb Methanol / 1000 bd-ft / 2000 lb/ton = 1.45 tons/yr Methanol EU015 Total: 5.31 + 7.41 + 1.45 = 14.17 tons/yr Methanol	
11. Potential, Fugitive, and Actual Emissions Comment:	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual 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: Formaldehyde	2. Total Percent Efficiency of Control: 0
3. Potential Emissions: 2.07 lb/hour 9.07 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): tons/year	
6. Emission Factor: 0.103 lb Formaldehyde / 1000 bd-ft lumber dried Reference: TAPPI Technical Bulletin 845	7. Emissions Method Code: 5
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): 9.07 tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
<p>10. Calculation of Emissions:</p> <p>Kiln No. 1: 66,000,000 bd-ft x 0.103 lb Methanol / 1000 bd-ft / 2000 lb/ton = 3.40 tons/yr Formaldehyde</p> <p>Kiln No 2 (as-modified): 92,000,000 bd-ft x 0.103 lb Methanol/1000 bd-ft / 2000 lb/ton = 4.74 tons/yr Formaldehyde</p> <p>Kilns Nos. 3:& 4: 1,500,00 cu-ft x 12 bd-ft/cu-ft x 0.103 lb Methanol / 1000 bd-ft / 2000 lb/ton = 0.93 tons/yr Formaldehyde</p> <p>EU015 Total: 3.40 + 4.74 + 0.93 = 9.07 tons/yr Formaldehyde</p>	
11. Potential, Fugitive, and Actual Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [2] of [2]

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 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 40 % Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance: Annual EPA Method 9 Visible Emissions Observation	
5. Visible Emissions Comment: Kiln No. 2, as modified to Triple-Length Continuous: VE observation points will be the open doorways at each end of the kiln.	
6.	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Attachment A

Engineering Report

Application for Construction Permit
North Florida Lumber, Inc. – Bristol, Liberty County
Facility ID 0770007
Engineering Report
May 12, 2009

North Florida Lumber, Inc. (NFL) is an existing major source of Criteria Pollutants and HAP. Its activities are production of softwood lumber and drying wood utility poles for an adjacent wood treating facility. The Materials flow and principal pollutant sources at NFL are summarized in Process Flow Diagrams #1–6 and the Boiler Process Flow Diagram (Attachment D). The general layout of the NFL facility appears in the Facility Site Plan (Attachment C). The NFL process consists of the following production sequence:

1. Log Handling
Southern Yellow Pine logs with bark attached (barky logs) are delivered to the site by truck, weighed and unloaded at the log storage yard by the radial crane or diesel-powered wheeled loaders.

2. Log Debarking
The barky logs are picked up by the radial crane and debarked by a mechanical debarker, then conveyed to the sawmill. Bark removed from logs is conveyed by belt to storage silos for loading into trucks for shipment off the NFL facility or used as boiler fuel (Process Flow Diagram #2). Log debarking emits fugitive PM and PM₁₀.

3. Sawmill
Lumber cut in the sawmill is sorted by an automated drop sorter line and deposited into corresponding bins holding lumber of the same size. The sized lumber is transferred by forklifts to Kilns Nos. 1 and 2 for drying. In addition to rough lumber, byproducts produced at the sawmill are wood chips and sawdust. The wood chips are loaded into trucks for shipment to pulp mills (Process Flow Diagram #5). Sawdust is pneumatically conveyed to the sawdust silo to fuel Boilers Nos. 1, 2 and 3. Sawing emits fugitive particulates, PM and PM₁₀. (Process Flow Diagram #3, Attachment D).

4. Boiler Nos. 1, 2 and 3
Boilers 1, 2 and 3 provide steam to heat lumber drying Kilns Nos. 1 through 4. Kilns Nos. 1 and 2 are used to dry lumber produced at NFL. Kilns Nos. 3 and 4 are used to dry utility poles produced by Apalachee Pole Company. After drying, the dried lumber is transferred to the planer mill by forklifts, where the surfaces of the rough, dried lumber are smoothed. Planing produces dry wood shavings, which are pneumatically conveyed to the fuel storage silos for sale off-site or used as boiler fuel. Pneumatic conveying of sawdust and dry planer shavings produce particulate emissions, PM and PM₁₀, which are controlled by cyclones (Process Flow Diagram # 1).

5. Kilns Nos. 1 and 2: Existing Lumber Drying Process

Each charge is loaded on a steel tram by forklift. The loaded tram is pushed into the kiln and the kiln doors are closed. Steam from the boilers is circulated inside each kiln by recirculating fans, drying the charge on the tram inside the kiln. Exhausted steam and water vapor, VOCs and HAP from the charge are exhausted through the kiln roof vents. Drying time averages twenty-one (21) hours.

6. Proposed TLC Modification of Kiln No. 2

Kiln No. 2 will be modified by lengthening the kiln to three times its current dimension. The new production process will consist of continuous feeding of green (wet) lumber and removal of dried lumber, hence the designation Triple Length Continuous (TLC) for Kiln No. 2 as-modified. In a TLC kiln green wood on trams is slowly advanced through the kiln, emerging at the other end as dry lumber approximately thirty-six (36) hours later. A plan and cross section of the TLC conversion of Kiln No. 2 appears at Attachment E.

A TLC kiln consists of three chambers, pre-conditioning, drying and post-conditioning. In the initial (in-bound) pre-conditioning chamber, the green lumber is pre-heated by steam generated in the drying chamber. In the central drying chamber, the water in the green lumber is driven off. This process generates Criteria VOCs and HAP, primarily methanol and formaldehyde from the sap in the green lumber. In the final post-conditioning chamber, the dried wood is gradually cooled to retard splitting and warping.

Due to the open-ended design of a TLC kiln, control equipment cannot be incorporated into or retrofitted. Hence, there will be no emission controls at Kiln No. 2.

The TLC conversion of Kiln No. 2 will increase lumber drying efficiency by approximately 55% over the current batch process, because of the pre-conditioning and post-conditioning chambers in the TLC kiln. Therefore, the maximum production capacity of Kiln No.2 will increase from the current capacity of 59,000,000 board-feet per year (59.0 MMBFY) to 92,000,000 board-feet per year (92.0 MMBFY).

Therefore, combustion emissions (CO, NO_x, PM, PM₁₀, SO₂ and combustion-VOC) would not increase, but potential Criteria VOC, methanol and total HAP from the lumber being dried will increase in proportion to the increased capacity at Kiln No. 2.

7. Kilns 3 and 4 – Utility Pole Drying Process

The utility pole drying process at Kiln Nos. 3 and 4 is similar to the lumber drying process at Kiln Nos. 1 and 2. Green utility poles are loaded onto a steel tram. The loaded tram is pushed into the kiln and the kiln doors are closed. Steam from Boiler Nos. 1, 2 and 3 is circulated inside the kiln by recirculating fans, drying the poles inside the kiln. Exhausted steam and water vapor, VOC and HAP from the poles are exhausted through the kiln roof vents. Pole drying time averages forty-eight to fifty-two (48-52) hours.

Proposed utility pole drying capacity at Kiln Nos. 3 and 4 would increase from 777,359 cubic feet per year (CFY) to 1,500,000 CFY as a result of this permit application. No physical changes at Kiln Nos. 3 and 4 are proposed.

8. Wood waste handling system

This system (EU 014) conveys bark, wood chips, sawdust and planer mill shavings via pneumatic conveying ductwork, belt conveyors and receiving cyclones to fuel storage silos and bark/wood chip bins (Process Flow Diagrams # 1-6). Wood waste handling and conveying will increase as a result of increased lumber drying capacity added by modification of Kiln No. 2.

9. Lumber Storage

Dried lumber from the planer mill is stored in covered storage sheds until it is shipped.

10. Insignificant Activities

The following insignificant activities are conducted at the NFL facility:

Mechanic shop for vehicle maintenance.

Aboveground storage tanks (ASTs): diesel fuel to fuel company trucks and forklifts, motor oil, unleaded gasoline, used motor oil, hydraulic fluid and used oil tank. Each AST has a capacity of less than 19,800 gallons.

Miscellaneous space heaters throughout the facility, all electric. There is no natural gas service to the NFL facility.

Miscellaneous office comfort air conditioning systems.

As of May 2009, the NFL facility does not have emergency generators or internal combustion engine-powered fire pumps.

Activities and Emissions Units

NFL facility emissions-producing activities are grouped into the following Emissions Unit Groups, based on applicable requirements:

EU 001	Boilers Nos. 1 and 3
EU 002	Boiler No. 2
EU 014	Wood Waste Handling & Storage System
EU 015	Kilns Nos. 1, 2, 3 and 4

Exempt Activities

Space heating equipment for heating of shops and offices, all electric.

Office supplies and equipment (62-210.300(3)(b)(1))

Package air conditioning and heating systems for offices (62-210.300(3)(a)4 and/or 62-213.430-6)

Fuel storage in aboveground storage tanks for company vehicles (62-210.300(3)(b)(1))

Vehicle maintenance shop (62-210.300(3)(b)(1))

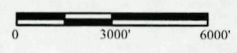
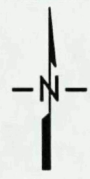
Purposes of Application

The purposes of this application are:

1. Modify existing lumber drying Kiln No. 2 from batch to Triple Length Continuous (TLC) by lengthening the kiln to three times its current length. Maximum lumber drying capacity at Kiln No. 2 will increase from 59.0 MMBFY to 92.0 MMBFY. Kiln No. 2 is currently permitted under Operating Permit # 0770007 012-AV.
2. Increase utility pole drying capacity at Kiln Nos. 3 and 4 from 777,359 cubic feet per year (CFY) to 1,500,000 CFY. No physical changes at Kiln Nos. 3 and 4 are proposed, only a drying capacity increase.
3. Kiln No. 1 will be operated as currently permitted with no expected emissions increases.
4. Increase wood waste collection, conveying and storage at EU 014 to accommodate increased lumber drying capacity added at Kiln Nos. 2, 3 and 4.
5. Facility-wide wood drying capacity will increase as a result of the expansion of production at Kiln Nos. 2, 3 and 4 from 143 MMBFY-equivalent to 176 MMBFY-equivalent.

Attachment B

General Location Map



GMR

& Associates, Inc.

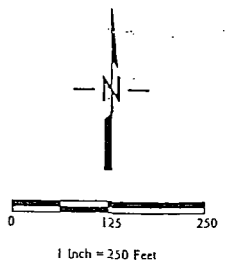
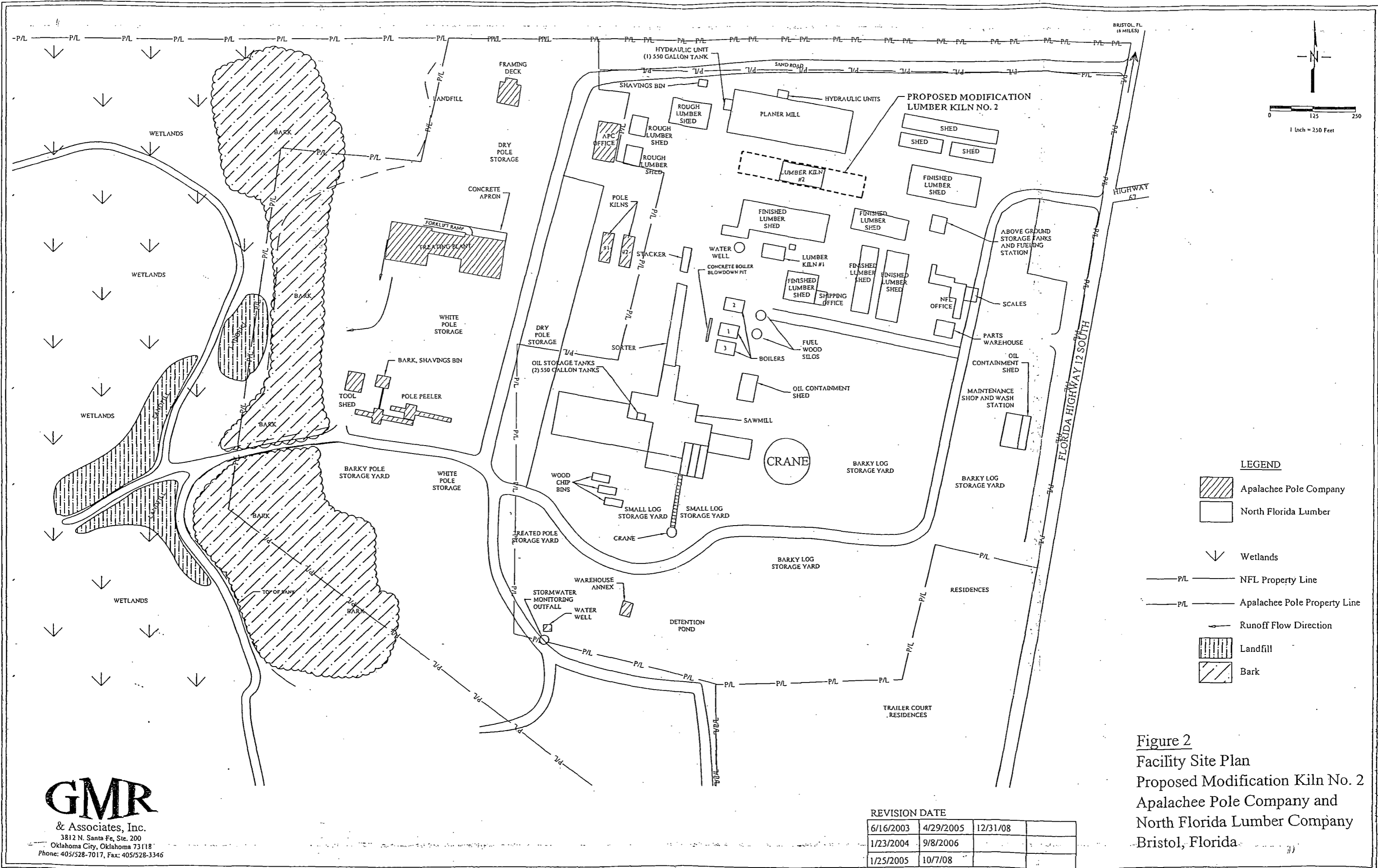
3812 N. Santa Fe, Ste. 200
Oklahoma City, Oklahoma 73118
Phone: 405/528-7017, Fax: 405/528-3346

Exhibit No. 1
General Location Map
North Florida Lumber Co.
Bristol, Florida

Source: Virtual Earth

Attachment C

Facility Site Plan



LEGEND

- Apalachee Pole Company
- North Florida Lumber
- Wetlands
- NFL Property Line
- Apalachee Pole Property Line
- Runoff Flow Direction
- Landfill
- Bark

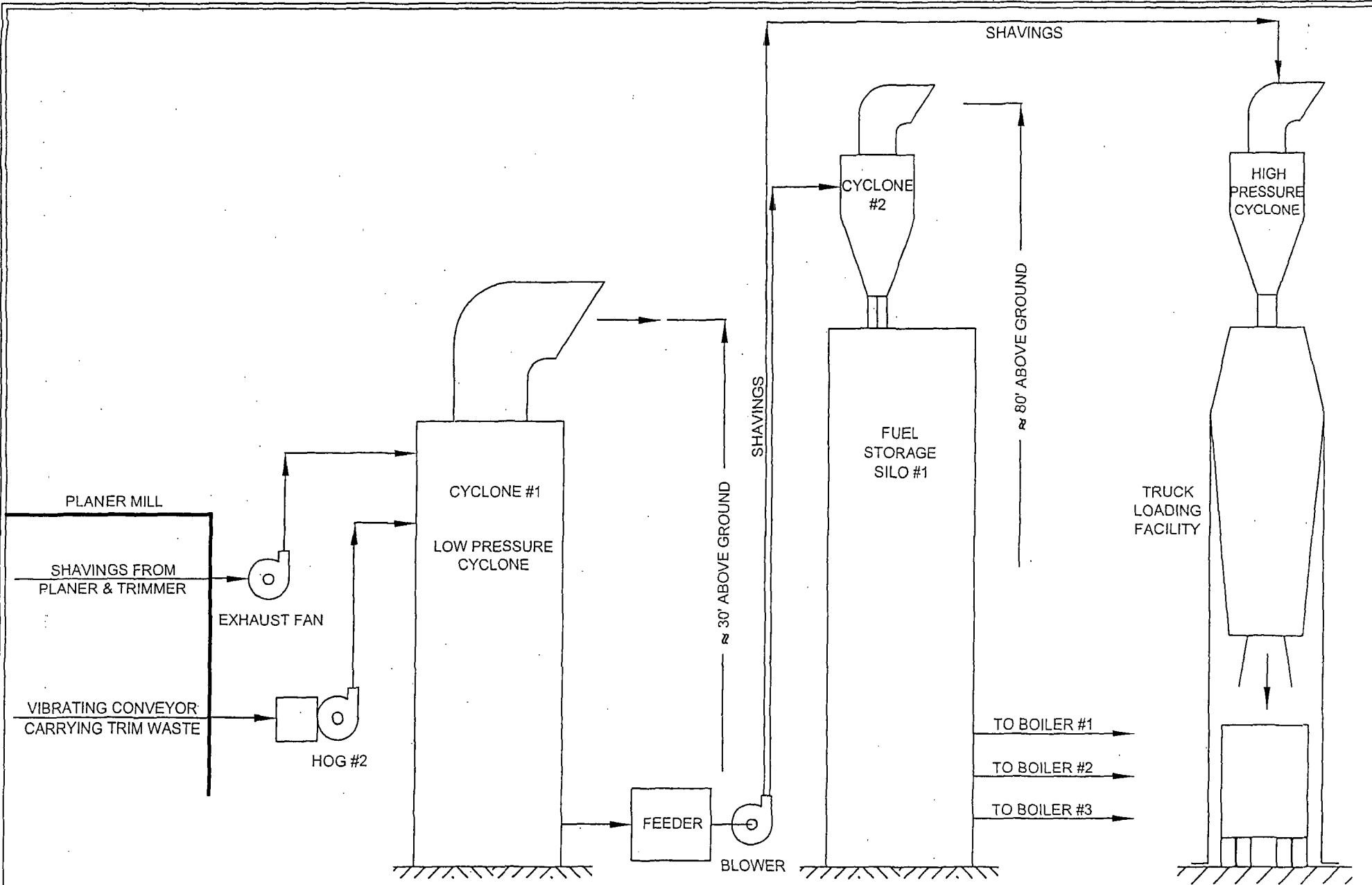
Figure 2
 Facility Site Plan
 Proposed Modification Kiln No. 2
 Apalachee Pole Company and
 North Florida Lumber Company
 Bristol, Florida

REVISION DATE			
6/16/2003	4/29/2005	12/31/08	
1/23/2004	9/8/2006		
1/25/2005	10/7/08		

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 & Associates, Inc.
 3812 N. Santa Fe, Ste. 200
 Oklahoma City, Oklahoma 73118
 Phone: 405/528-7017, Fax: 405/528-3346

Attachment D

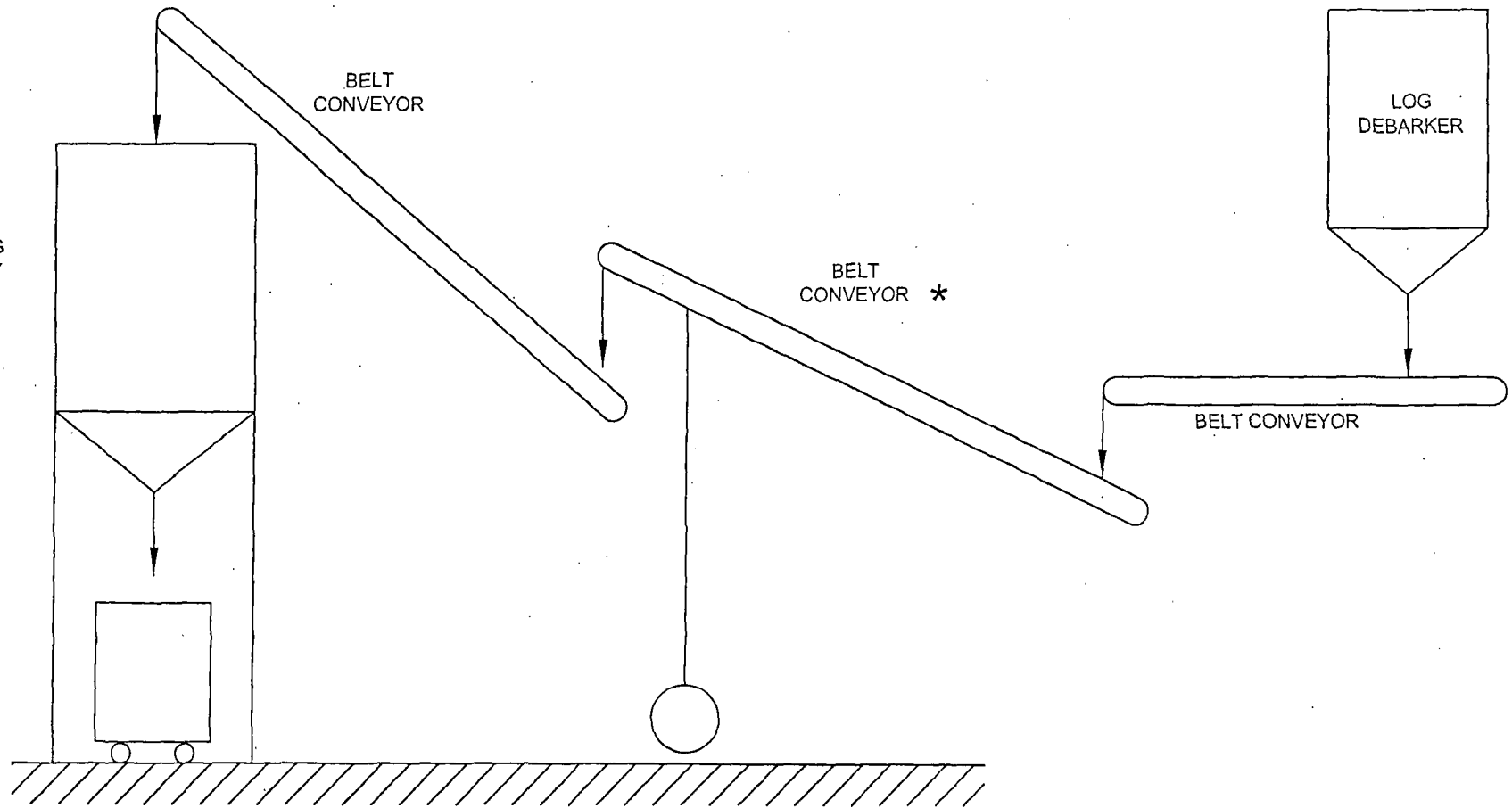
Process Flow Diagrams



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Wood Waste Diagram - Planer Shavings
 Sheet #1
 North Florida Pole Company
 Bristol, Florida

TRUCK
LOADING
FACILITY



BELT
CONVEYOR

BELT
CONVEYOR *

LOG
DEBARKER

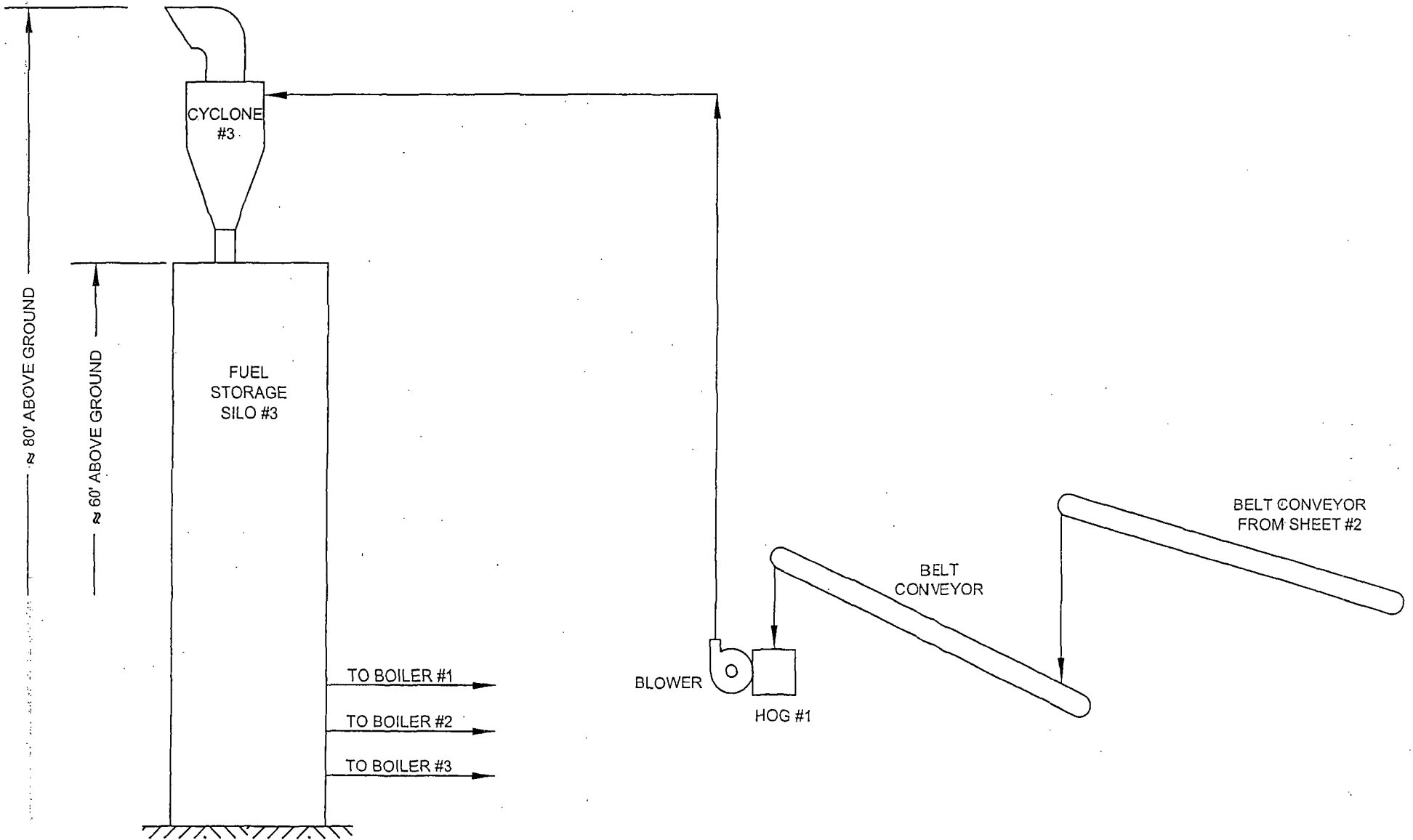
BELT
CONVEYOR

GMR

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* BELT CONVEYOR ALSO DELIVERS BARK TO HOG#1
CONTINUED ON SHEET #3

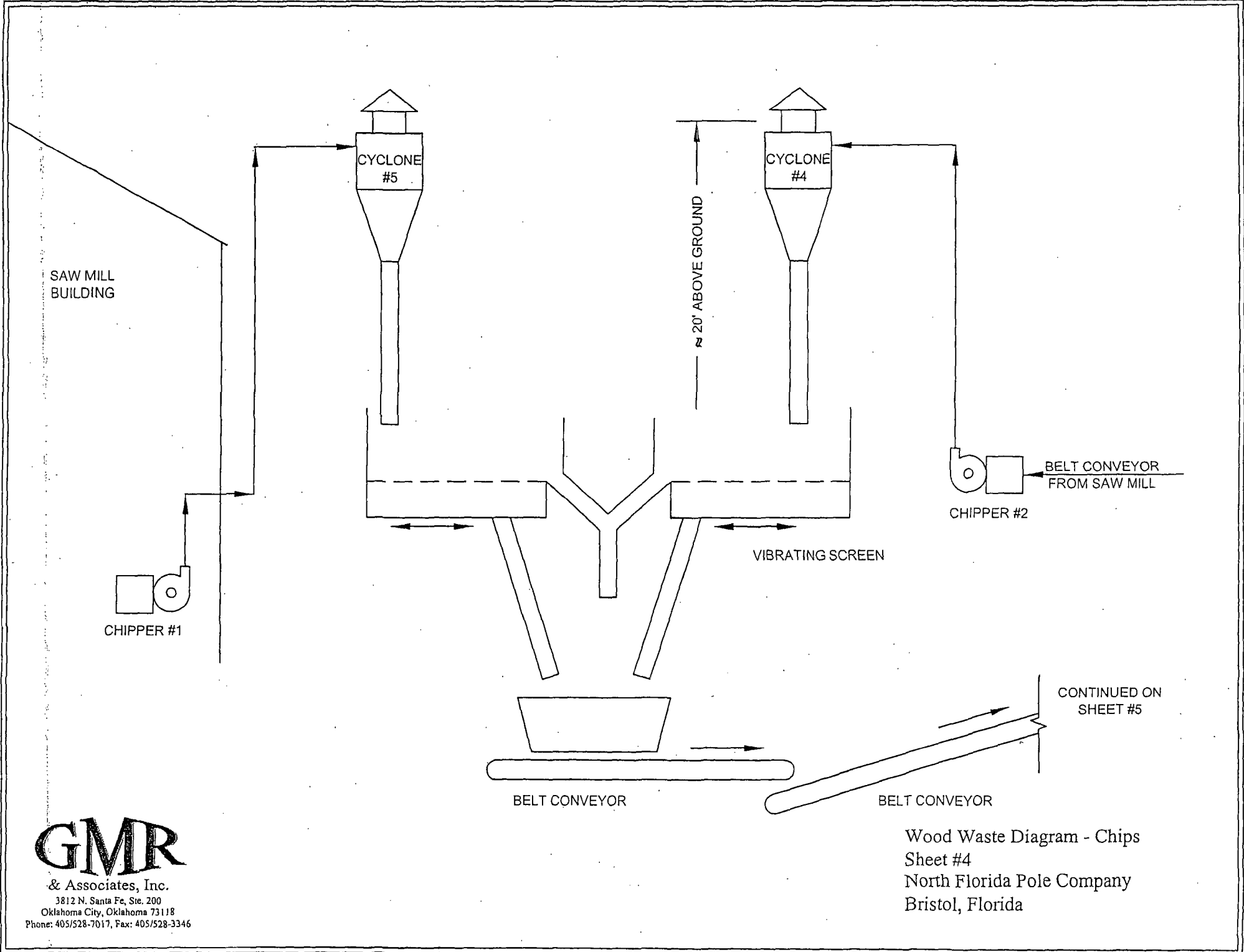
Wood Waste Diagram - Bark
Sheet #2
North Florida Pole Company
Bristol, Florida



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Wood Waste Diagram - Bark
 Sheet #3
 North Florida Pole Company
 Bristol, Florida



SAW MILL BUILDING

CHIPPER #1

CYCLONE #5

CYCLONE #4

~ 20' ABOVE GROUND

Belt Conveyor FROM SAW MILL

CHIPPER #2

VIBRATING SCREEN

Belt Conveyor

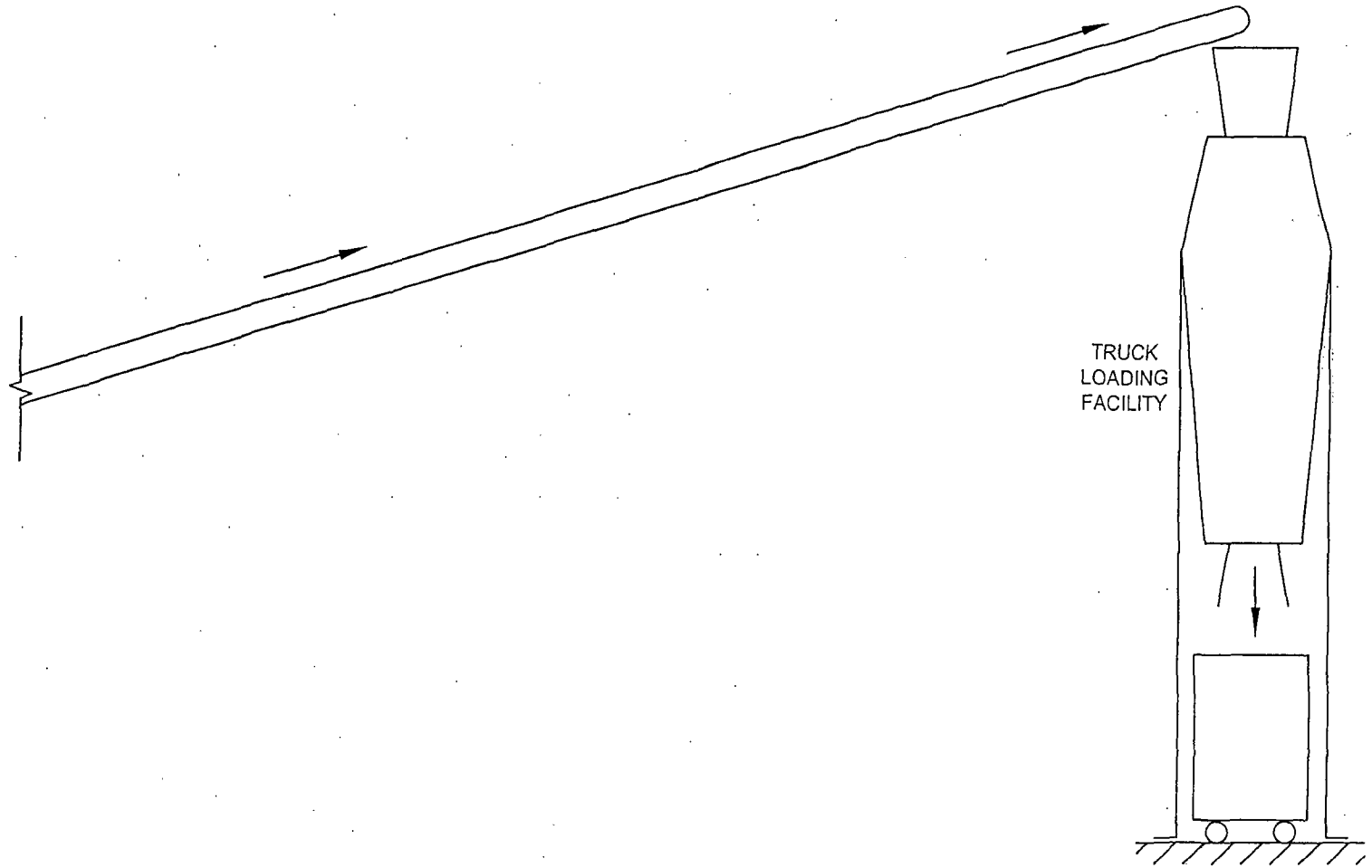
Belt Conveyor

CONTINUED ON SHEET #5

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Wood Waste Diagram - Chips
 Sheet #4
 North Florida Pole Company
 Bristol, Florida

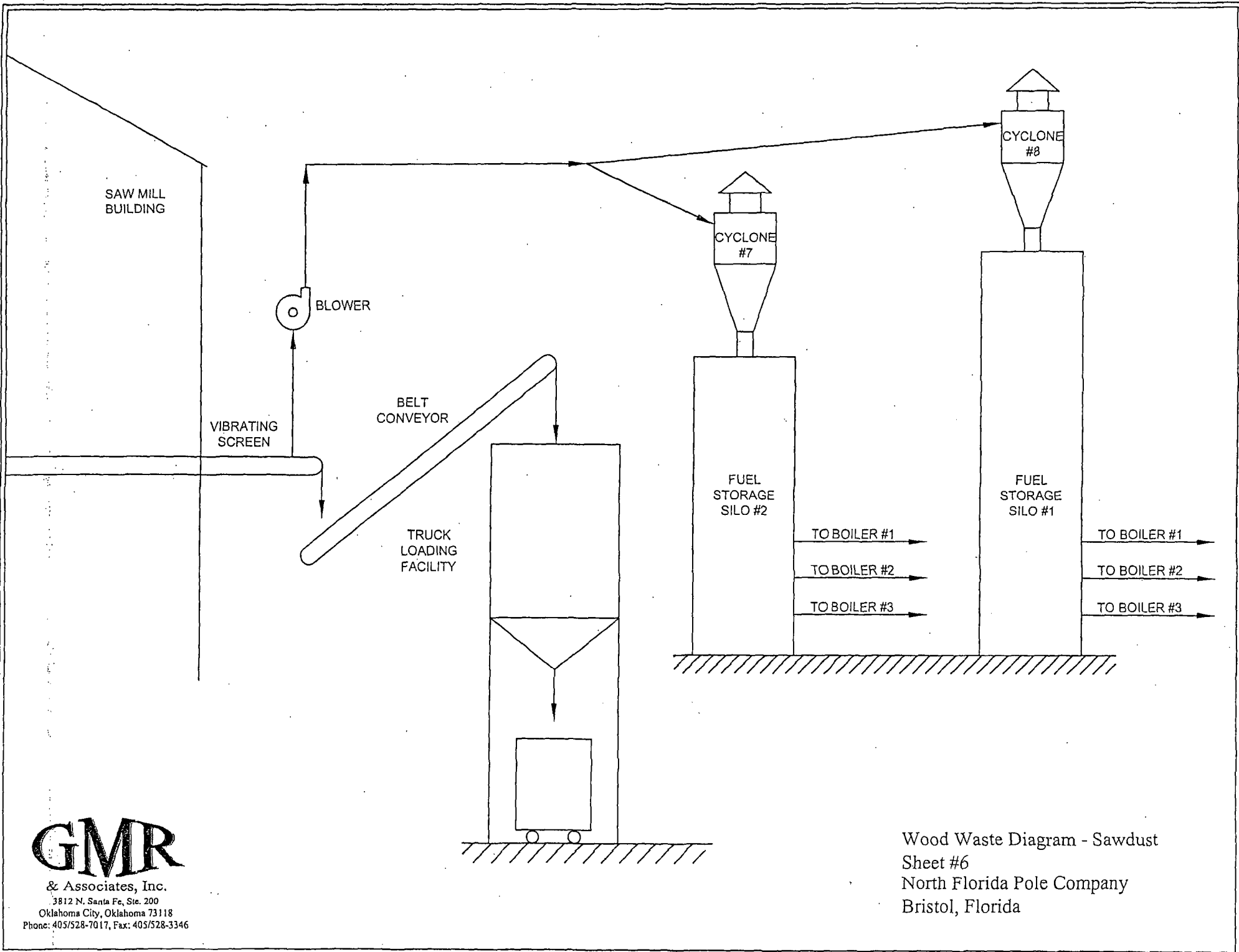
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SHEET #4



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Wood Waste Diagram - Chips
Sheet #5
North Florida Pole Company
Bristol, Florida



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Wood Waste Diagram - Sawdust
 Sheet #6
 North Florida Pole Company
 Bristol, Florida

WASTE WOOD SILO #1

WASTE WOOD SILO #2

WASTE WOOD SILO #3

WASTE WOOD TO BOILERS

STEAM BOILER #1

STEAM BOILER #2

STEAM BOILER #3

STEAM TO DRYING KILNS

STEAM TO DRYING KILNS

STEAM TO DRYING KILNS

MULTICLONE

MULTICLONE

MULTICLONE

MULTICLONE

MULTICLONE

MULTICLONE

EXHAUST B-1

ASHES TO ASH REMOVAL SYSTEM

EXHAUST B-2

ASHES TO ASH REMOVAL SYSTEM

EXHAUST B-3

ASHES TO ASH REMOVAL SYSTEM

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Boiler Process Flow Diagram
North Florida Pole Company
Bristol, Florida

Attachment E

**Lumber Drying Kiln Specifications
Kiln No. 2**

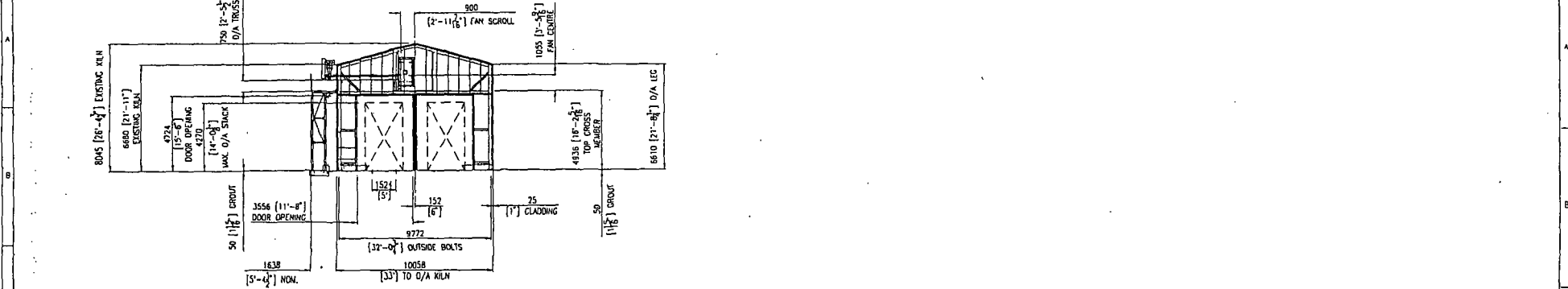
TOLERANCE TO WEGL SPEC

DIMENSIONS IN MILLIMETRES U.O.S.

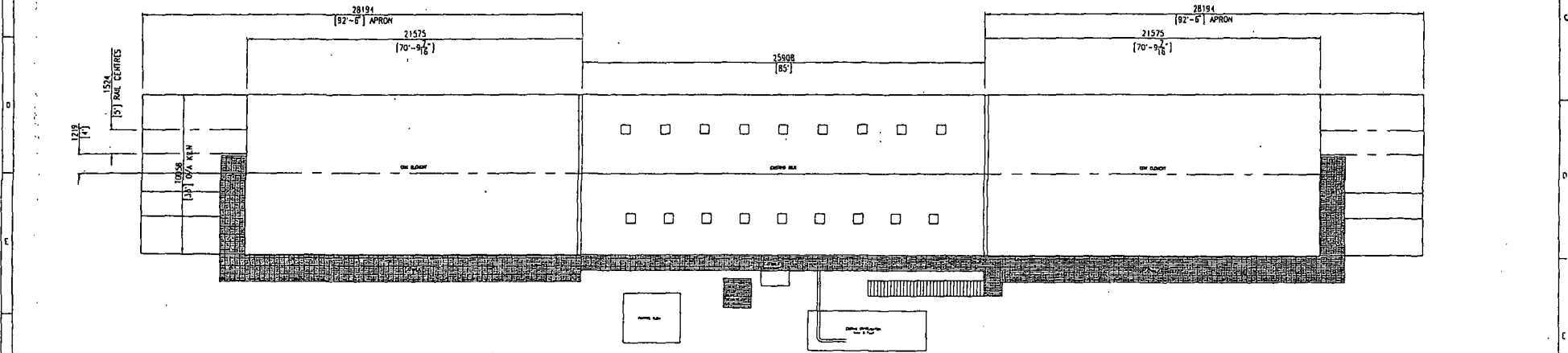
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IF IN DOUBT - ASK

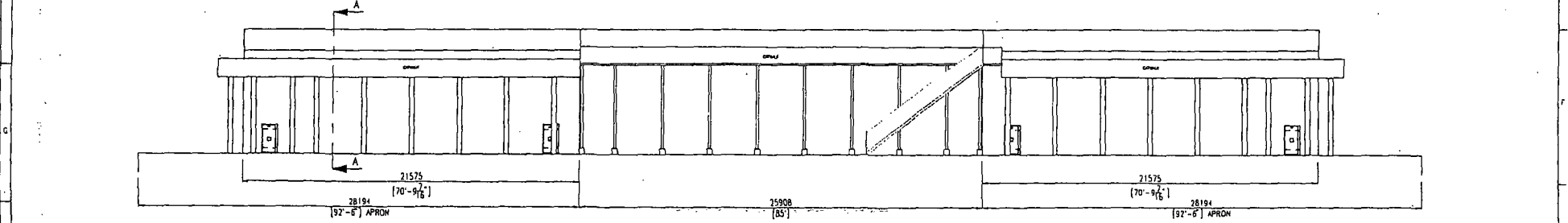
REV 1



SECTION A-A



PLAN



ELEVATION

PRELIMINARY ONLY

Windsor
 WELLINGTON MELBOURNE VIC.
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 FAX +64 4 232 5929 FAX +61 3 9580 7748

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GENERATED FROM: A1-9086-902-1/	CATEGORY:
SCALE: 1:125	REF. ONLY
DRAWN: ELP	DATE: 27/01/2008
CHECKED: RM	DATE: 27/01/2008
STD. APPROVED:	DATE:

9086	CHECKED
A	UPDATE?
A	TITLE

CDK CONVERSION G.A. FOR NORTHERN FLORIDA LUMBER	
PROJECT NUMBER	SHEET 1 of 1
A1-9086-903-1	A

Attachment F

**Prevention of Significant Deterioration Review
and
Kiln No. 2 Operations and Maintenance Manual**

NORTH FLORIDA LUMBER, INC.
BRISTOL SAWMILL
CONSTRUCTION PERMIT APPLICATION - FACILITY I.D. 0770007
PSD REVIEW PER FAC 62-212.400
MAY 5, 2009

Production Process

North Florida Lumber, Inc. (NFL) is an existing major source of Criteria Pollutants and HAP. Its sole activity is production of lumber and dried wood utility poles. The NFL process consists of the following production sequence:

1. Southern Yellow Pine logs with bark attached (barky logs) are delivered to NFL by truck and stored at the log storage yard. The barky logs are debarked by a mechanical debarker and conveyed to the sawmill, where they are sawed into various sizes of lumber. Bark removed from logs is conveyed to one of three fuel storage silos adjacent to the three boilers to be used as fuel or conveyed to a bark truck loading station for shipment off the NFL facility. Log de-barking emits PM and PM₁₀.
2. Lumber cut in the sawmill is sorted by an automated sorter line and transferred by forklifts to the steam-heated drying kilns for drying.
3. Wood scrap produced in the sawmill is conveyed to chippers, where it is chipped and then conveyed to chip truck loading station to be shipped off the NFL property. Sawdust produced by this process is conveyed to one of three fuel storage silos located adjacent to the three boilers to be used as fuel, or is conveyed to sawdust truck loading station to be shipped off the NFL property. Wood waste handling emit PM and PM₁₀.
4. The NFL Facility presently has two (2) lumber drying kilns, Nos. 1 and 2. An adjacent facility, Apalachee Pole Company (APC), has two (2) utility pole drying kilns at the NFL facility, kilns Nos. 3 and 4. Debarked and peeled utility poles from the adjacent APC facility are dried in kilns Nos. 3 and 4 using steam supplied by the NFL boilers. Wood drying emits VOC, Methanol and Formaldehyde.
5. The NFL facility has three wood waste-fueled boilers to provide steam to drying kilns Nos. 1-4. Boilers 1, 2 and 3 emit CO, NO_x, SO₂, VOC, PM and PM₁₀.
6. Kilns 1-4 currently operate on a batch process (charges). A charge of green lumber or poles is positioned on a steel tram, rolled into a kiln, then the kiln doors are shut. Temperature and humidity inside each kiln is controlled by thermostats and humidifiers, which control the quantity of steam passing through heating coils and/or humidifiers. Roof vents are automatically controlled to regulate temperature and humidity inside the kiln and to exhaust water vapor, VOC, Methanol and Formaldehyde. Drying cycles can be as long as 96 hours.
7. Dried lumber is transferred to the planer mill. where the lumber surfaces are smoothed to customer specifications. Shavings produced by this process are pneumatically conveyed to one of the three fuel storage silos located adjacent to the boilers to be burned as fuel, or conveyed to a shavings truck loading station to be shipped off the NFL facility. Planing emits PM and PM₁₀.
8. The wood waste handling system conveys pine bark, chips, sawdust and shavings, consisting of pneumatic ductwork, belt conveyors, receiving cyclones and storage bins, emitting PM and PM₁₀.
9. Lumber from the planer mill is stored in covered storage sheds until it is shipped off site.

Boiler Nos. 1, 2 and 3

Boiler No. 1 has a maximum heat input capacity of 29.6 MM BTU/hr and is equipped with a wood gasification system. Fuel used is waste wood generated by the NFL facility. Fuel is conveyed to Boiler No. 1 using a screw conveyor to feed the gasifier prior to being burned in the burner chamber. Boiler No. 1 was manufactured by Industrial Boiler. Since steam demand in the drying kilns varies during the drying cycle, wood delivery to Boiler No. 1 is varied according to need.

PM and PM₁₀ emissions are controlled by two multiple tube dry collectors in series manufactured by Zurn, Model MTSA-30-9-CYT-A. Ash collected by the multiclones is emptied into containers located under multiclones. Steam production is continuously measured and recorded on a recording chart.

Boiler No. 2 has a maximum heat input capacity of 42.9 MM BTU/hr and is also equipped with a wood gasification system. Fuel used is waste wood from the NFL facility, stored in three adjacent fuel silos. The fuel is conveyed using a variable speed screw conveyor to the gasifier prior to being burned in the burner chamber. Boiler No. 2 was manufactured by Industrial Boiler. PM and PM₁₀ emissions are controlled by two multiple tube dry collectors in series, manufactured by Zurn, Model MTSA-36-9-CYT-A. Ash collected by the multiclones is emptied into containers located under the multiclones. Steam production is continuously measured and recorded on a recording chart.

Boiler #3 has maximum heat input capacity of 28.8 MM BTUH/hr and is equipped with a wood gasification system. Fuel used is waste wood generated by the NFL facility, which is stored in three fuel silos. Fuel is conveyed by a variable speed screw conveyor to the gasifier prior to being burned in the burner chamber. Boiler No. 3 was manufactured by Hurst Boiler & Welding Company, model HYB-3900. Steam delivery from Boiler No. 3 is varied according to need by the kilns. PM and PM₁₀ emissions are controlled by two multiple tube dry collectors in series manufactured by Hurst Boiler & Welding Company, Model K12-16T and K9-44T respectively. Steam production is continuously measured and recorded on a recording chart. Ash is conveyed by screw conveyor to an enclosed bin for removal by front-end loader.

Previous Permitting Actions

On July 21, 2006, DEP issued Permits 0770007-009-AC and 0770007-010-AV to change the following process limits: Increase lumber drying from 99,691,489 board-feet/yr to 106,651,489 board-feet/yr, and decrease pole drying from 1,357,359 cubic feet/yr to 777,359 cubic feet/yr. No emissions changes were requested at that time.

On June 10, 2008 FDEP issued Title V Operating Permit Renewal # 0770007-012-AV. Maximum production limits remained at 106,651,489 board-foot lumber and 777,359 cubic feet utility poles per year.

Insignificant Activities

The following insignificant activities are conducted at the NFL facility:

Mechanic shop for vehicle maintenance

Two (2) aboveground storage tanks, 3,000 gallon gasoline and 10,000 gal diesel fuel. Both are used to fuel company trucks and equipment;

260 gal used oil tank at the Mechanic Shop, and

500 gal used oil tank at sawmill.

Miscellaneous space heaters throughout the facility, all electric.

Miscellaneous office comfort heating/air conditioning systems.

As of April 2009, the NFL facility does not have IC engine emergency generators or fire pumps.

Current and Proposed Production Capacity

Current permitted (Permit 0770007-012-AV) annual production capacity:

106,651,489 board-feet lumber

+ 777,359 cubic feet utility poles

115,979,797 board-foot equivalent

Proposed annual production capacity:

158,000,000 board-feet lumber

+ 1,500,000 cubic feet utility poles

176,000,000 board-foot equivalent

To produce 158,000,000 board-feet lumber requires approximately 779,320 TPY barky logs.

Boiler Ratings

Boilers located at the NFL facility are rated as follows:

Boiler #1 29.6 MMBTU/HR

Boiler #2 42.9 MMBTU/HR

Boiler #3 +28.8 MMBTU/HR

Total 101.3 MM BTU/HR

The heat value of the wood waste burned at NFL is 4,500 BTU/lb, or 9.0 MMBTU/ton.

The Boiler Activity Factor is expected to remain close to 0.75, due to the fact the boilers are fired continuously at periods of no demand for steam, i.e. at “idle”, to prevent thermal damage caused by frequent shutdowns and re-starts over weekends. Therefore, little increase in fuel consumption over previous fuel use is expected.

Annual expected fuel consumption of Boilers 1, 2 and 3:

Expected annual fuel use: EU 001: 42,632 tpy; EU 002: 31,318 tpy; Facility-wide: 73,950 tpy

Theoretical/PTE: $101.3 \text{ MM BTU/hr} \times 1.0 \times 8760 \text{ hr/yr} / (9.0 \text{ MMBTU/ton}) = 98,599 \text{ tpy}$

Proposed Production increase

Dried lumber production at existing lumber drying Kiln No. 2 is proposed to be increased from 59.0 million board-feet per year (MMBFY) to 92.0 MMBFY. This would be accomplished by expanding the kiln to triple its current length and operating it continuously, rather than as a batch-type kiln. The modified Kiln No.2 would be known as a Triple Length Continuous (TLC) kiln.

Utility pole drying capacity at Kiln Nos. 3 and 4 would increase from 777,359 cubic feet per year (CFY) to 1,500,000 CFY. No physical modification of Kilns 3 and 4 is proposed.

The pollutant that subjects the NFL Bristol sawmill to PSD requirements is Criteria VOC. The proposed expansion of the NFL facility would result in a PSD-significant increase in VOC of 79.25 tons per year versus the PSD threshold of 40 tpy VOC.

Expected CO, NO_x, VOC, SO₂, PM and PM₁₀ emission rates were calculated at maximum boiler heat input rates for Boilers Nos. 1, 2 and 3 at continuous operation (8760 hours per year in the renewal application for Operating Permit # 077007-012-AV. CO, NO_x and SO₂ would not increase as a result of the expansion, because these pollutants were already calculated at maximum boiler heat input 8760 hours per year. VOC, HAP, PM and PM₁₀ would increase as a result of modification of Kiln No. 2, due to increased lumber drying and increased processing of bark logs to provide feedstock for the expansion of Kiln No. 2.

1 Source Information

Increased emissions of VOC, Methanol and Formaldehyde will result from increased wood drying capacity at Kiln No. 2, as modified. Drying Kiln No. 2 will be physically modified by lengthening to three times its current length and by changing its operating practice from batch to continuous operation. The potential operating schedule will remain the same, 8760 operating hours per year. The lumber drying capacity increase would be from the current rate of 59.0 MMBFY to 92.0 MMBFY at Kiln No.2 and from 777,359 to 1,500,000 cubic feet poles per year at Kiln Nos. 3 and 4, resulting in a facility-wide annual production increase from 115.979,797 to 176.0 MMBFY-equivalent.

Increased VOC and HAP from Kiln No. 2 will be emitted from the two open doorways at each end of the kiln and roof vents. There will be no doors on Kiln No. 2. Kiln Nos. 1, 3 and 4 will remain as currently permitted as batch-process kilns with doors at each end.

2. Construction Schedule

Existing drying Kiln No. 2 will be modified by the following modifications:

A. Lengthening to three times its current length. Kiln No. 2 will become a Triple Length Continuous (TLC) kiln, three times the standard length for a batch-process kiln. New TLC technology features a continuous production process in which the kiln has three sub-chambers, a pre-conditioning zone, drying zone and post-conditioning zone.

B. Continuous operation. The operating practice at Kiln No. 2 will change from discrete batches, known as charges, to continuous operation. Wet (green) lumber is loaded onto a slowly moving steel tram at one end of the kiln, while dried lumber is continually removed from the other end of the tram exiting the kiln. At present, the two tracks in the kiln are used

to hold two stationary trams. Under TLC operation, the trams will move in opposite directions. TLC kiln operation can be described as a double-track railroad passing through a heated tunnel.

C. Operating schedule. Because green and dry lumber will be continually loaded and unloaded from the slowly moving trams at both ends of the Kiln No. 2, there will be no discreet batches or charges. Down-time will be limited to scheduled maintenance and periods of low product demand.

D. Construction schedule. Modification of Kiln No. 2 is expected to take approximately three (3) months for extending the track, construction of the chambers at each end of the kiln and installation of fans and baffles to control flow of heat and water vapor.

The existing doors will be removed from Kiln No. 2 as the first step of the modification before the two pre- and post-conditioning chambers are constructed. When completed, the kiln will have the appearance of an open-ended tunnel.

E. Kiln modification design. A cross section and plan view drawing of the TLC modification of Kiln No.2 is presented in Attachment E.

3. Continuous Emissions Reduction

Measures to continually reduce VOC and HAP emissions from lumber and utility pole drying to best extent possible, while meeting customer specifications is presented in the Kiln No. 2 Operations and Maintenance Manual in Attachment F

4. Source Impact Analysis

Liberty County is in attainment with Federal ambient air quality standards. The increased emissions are not expected to result in non-attainment status.

5. Air Quality Models

The proposed increase in Criteria VOC will be 79.25 tons per year, less than the 100-ton significant threshold. It is unlikely regional ozone transport models could accurately assess the impact of a relatively small increase in VOC from a single stationary source on the ozone attainment status of Liberty and Calhoun Counties.

6. Air Quality Analysis

VOC is a surrogate for Ozone, a regional Criteria pollutant. Because the proposed increase will be less than 100 tons, 79.25 tpy, regional Ozone models would not be able to show the impact of such a relatively small single point source. The proposed VOC increase would also be *de minimis* for conducting ambient air quality monitoring.

7. Additional Impact Analysis

The expected increase in emissions should not affect soils or vegetation, because the pollutants that would increase the most, VOC, Methanol and Formaldehyde, do not form acid aerosols or particulates that would be deposited on vegetation. Criteria VOC, formaldehyde and methanol from wood drying are transparent and are not expected to impair visibility in the immediate airshed.

8. Sources Affecting Federal Class I Areas

No known federally designated Class I air quality areas are known within approximately 250 miles of the project. Federal Class I areas are defined in the Clean Air Act as national parks over 6,000 acres and wilderness areas and memorial parks over 5,000 acres, established as of 1977.

CURRENT AND POST-CONSTRUCTION EMISSION CALCULATIONS

Emissions summary tables and supporting calculations of Baseline Actual and Projected Actual Emissions Calculations comparing emissions of VOC, Methanol and Formaldehyde under permit 077007-012-AV versus post-construction emissions proposed under this application are presented in Attachment H, on a pollutant-specific basis.

VOC, Formaldehyde, Methanol will increase, due to increased lumber and utility pole drying at Kiln Nos. 2, 3 and 4. PM and PM₁₀ will increase due to the increase in raw “barky” logs that will be debarked, sawed and planed.

NORTH FLORIDA LUMBER, INC.
BRISTOL SAWMILL
FACILITY I.D. # 0770007
KILN NO. 2 - OPERATIONS AND MAINTENANCE MANUAL
MAY 6, 2009

Background

Dried lumber production at existing lumber drying Kiln No. 2 is proposed to be increased from 59.0 million board-feet per year (MMBFY) to 92.0 MMBFY. This would be accomplished by expanding the kiln to triple its current length and operating it continuously, rather than as a batch-type kiln. After modification Kiln No.2 would be a Triple Length Continuous (TLC) kiln. Facility-wide production would increase from 143 MMBFY-equivalent to 176 MMBFY-equivalent.

Rules at FAC 62-4.070(1) and 62.4160(6) require an Operations and Maintenance (O&M) Manual for emissions units subject to PSD to minimize emissions of Hazardous Air Pollutants .

Because emission controls for drying kilns are unavailable at this time, EPA believes work practices may be appropriate substitutes for emission controls and/or numerical emission limits for kilns to minimize HAP emissions (Appendix A). Operating practices that minimize HAP emissions, while producing a marketable product, consist of the following: 1) Prevention of overdrying the lumber, 2) Ensure consistent moisture content throughout the charge to prevent re-processing in the kiln and 3) Drying at the minimum temperature necessary to achieve the required moisture content.

The emissions of HAPs from the drying of wood are a function of temperature and moisture content of the wood. In general, drying wood to lower final moisture contents will result in more HAP emissions. Drying at higher temperatures to a target moisture content generally results in more HAP emissions than drying to the same moisture content at a lower temperature. Exposing drier wood to higher temperatures produces more HAPs. Therefore, kiln operating practices that reduce overdrying and piece-to-piece moisture variability will reduce total HAP emissions.

1) Prevention of Overdrying

Minimize the degree of overdrying by:

- a. Setting the charge target moisture content relative to the industry lumber grade requirement and/or customer required moisture content at the maximum value possible that does not result in an unacceptable redry rate.
- b. Maintain records of actual charge average moisture contents and computing a monthly average and twelve month rolling average overdry percent.
- c. Properly maintaining critical kiln components such as baffles, fans, vents, steam heating coils and kiln controls to provide as uniform a temperature and air flow throughout the kiln as reasonably possible.
- d. Reversing the direction of kiln air flow at appropriate intervals to improve uniformity of drying and thereby reduce overdrying the charge.

e. Maintaining records of kiln conditions for each charge dried, including dry bulb temperature, wet bulb temperature, and drying time.

2) Ensure Consistent Moisture Content

Minimize the piece-to-piece moisture content variability by:

a. Proper stacking and spacer stick placement to provide good air flow through the charge

b. Properly maintaining critical kiln components such as baffles, fans, vents, steam heating coils and kiln controls to provide as uniform a temperature and air flow as reasonably possible.

c. Reversing the direction of kiln air flow at appropriate intervals to improve drying uniformity.

d. Maintain records of piece-to-piece moisture content variability on each charge and computing a mean and standard deviation of the data. Track mean values and standard deviations on a monthly and twelve-month rolling basis.

3) Drying at the Minimum Temperature

Adjust thermocouple settings at various locations inside the kiln to identify and prevent “hot spots” above the minimum drying temperature, approximately 250 ° F.

APPENDIX A
MEMORANDUM FROM EPA TO LUMBER KILN STAKEHOLDERS
PROPOSED PWCP MACT APPLICABILITY TO LUMBER KILNS
JULY 28, 2003

From: Kissell.Mary@epamail.epa.gov [mailto:Kissell.Mary@epamail.epa.gov]
Sent: Monday, July 28, 2003 11:00 AM
To: debbie@slma.org; tim_hunt@afandpa.org; hydels@koppers.com
Subject: Lumber Kilns in Proposed PCWP MACT - Request for Clarification

Dear Stakeholders:

On January 9, 2003, the U.S. Environmental Protection Agency (EPA) published the proposed Plywood and Composite Wood Products (PCWP) national emission standards for hazardous air pollutants (NESHAP) in the Federal Register. We noted in the proposal preamble that some wood products industry representatives requested that all lumber kilns (regardless of location) be considered under the PCWP rulemaking so there would be one maximum achievable control technology (MACT) determination for all lumber kilns nationwide. We proposed to include all lumber kilns in the PCWP source category because the design and operation of lumber kilns are essentially the same regardless of whether the kilns are located at a sawmill or are collocated with PCWP or other types of manufacturing operations. We thought that broadening the scope of the PCWP source category to include lumber kilns located at any type of facility was reasonable because, based on our information, there are no currently applicable controls for lumber kilns, and because it is more efficient to include lumber kilns in the MACT process now than to address them in a separate rulemaking (should kiln-dried lumber manufacturing be listed as a major source category under section 112(c) of the Clean Air Act in the future).

Attachment G

BACT Review

NORTH FLORIDA LUMBER, INC.
BRISTOL SAWMILL
FACILITY I.D. 0770007
BEST AVAILABLE CONTROL TECHNOLOGY REVIEW
APRIL 24 2009

Volatile Organic Compounds

RACT/BACT/LAER Control Technology Review

Twenty-eight issued BACT PSD permits issued since January 1999, were reviewed at the on-line USEPA RACT/ BACT/LAER Clearinghouse database on April 24, 2009. All permitted facilities searched are engaged in drying softwood lumber in the Southeastern States and east Texas. Twelve of the facilities reviewed use steam-heated drying kilns like North Florida Lumber, Inc. One kiln is direct-flame and the other thirteen permit records do not specify the kiln heat source.

The results of the database search are that add-on control equipment is either infeasible or unavailable. VOC controls listed in the PSD permit database consist of the following: Good operating practices, routine kiln preventive inspection and maintenance programs, record keeping, fuel switching (natural gas, where available), work practices, good engineering practices, production limits, computerized steam management system and good combustion control.

Copies of the EPA Clearinghouse database search appear in Appendix G.

VOC/HAP Control Technology Discussion

Flue Gas Recirculation

VOC, Methanol and Formaldehyde emissions from drying Kiln No. 2 are emitted from the two open doorways and multiple roof vents. No means of manifolding the open doorways and roof vents is known at this time. Drying kiln emissions are primarily water vapor, which, if returned to afterburner chambers, would impair kiln burner performance, requiring an *increase* in fuel consumption, resulting in increased NO_x, CO, SO₂, VOC and PM₁₀.

Incineration / Catalytic Oxidation

Unlike SO₂ and particulates, VOCs, Formaldehyde and Methanol cannot be filtered or scrubbed out of the gas stream. They have to be oxidized by catalytic converters or destroyed in thermal oxidizers, using supplemental natural gas. There is no natural gas service to the NFL facility. To manifold a drying kiln, the pollutant "capture efficiency" would be very low, since the kiln has "breathe" to emit the water from the charge. Drying kiln emissions are primarily water vapor, which, if returned to an afterburner chambers, would require a large proportion of supplemental fuel to overcome the dampening effect of the water vapor from the drying kiln, resulting in *increased* NO_x, CO, SO₂, VOC and PM₁₀.

cfpub.epa.gov/rblc/cfm/basicSearchResult.cfm?

RequestTimeout=500&CFID=2740785&CFTOKEN=28758895&jsessionid=28302b5052b695d3dd20724e5ad169369615TR43020324302830



Technology Transfer Network
Clean Air Technology Center - RACT/BACT/LAER Clearinghouse

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Your search has found **28** facilities and **35** processes that match your search criteria. You can view details for one or more facilities by clicking on the highlighted RBLC identifier or the process description in the list below. To create a report, select one of the standard output formats from the [list of reports](#) at the bottom of this page. Only facilities that are checked in the table below will be included in your report. Click on the check box next to any facility to switch between checked and unchecked or use the "Check" or "Un-Check" all facilities buttons at the top of the list to check or uncheck all records in the list.

Matching Facilities for Search Criteria:

Permit Date Between 1/1/1999 And 4/24/2009
And Process Type Contains "30.8"
And Pollutant Name Like VOC

Check

Un-Check

ALL Facilities

NOTE: Draft determinations are marked with a " * " beside the RBLC ID.

RBLC ID	CORPORATE/COMPANY & FACILITY NAME	CODE	PROCESS DESCRIPTION	PERMIT NUMBER PERMIT DATE
<input checked="" type="checkbox"/> AL-0235	BOWATER (ALABAMA) INC. FOREST PRODUCT DIVISION ALBERTVILLE SAWMILL	30.800	<u>TWO 182.14 MBF, STEAM-HEADED LUMBER DRY KILNS (NORTH & SOUTH - K100/K101)</u>	711-S001- X004 04/09/2008
<input checked="" type="checkbox"/> OK-0113	WEYERHAEUSER WRIGHT CITY COMPLEX	30.800	<u>LUMBER KILNS</u>	99-052-C (M-2) PSD 07/21/2006
<input checked="" type="checkbox"/> * WA-0327	SIERRA PACIFIC INDUSTRIES SKAGIT COUNTY LUMBER MILL	30.800	<u>7. DRY KILNS</u>	PSD 05-04 01/25/2006
<input checked="" type="checkbox"/> AR-0083	POTLATCH CORPORATION POTLATCH CORPORATION - OZAN UNIT	30.800	<u>KILNS 1-4</u>	0117-AOP- R4 07/26/2005
<input checked="" type="checkbox"/> AR-0084	POTLATCH CORPORATION POTLATCH CORPORATION - OZAN UNIT	30.800	<u>KILNS 1-4</u>	0117-AOP- R4 07/26/2005
<input checked="" type="checkbox"/> LA-0181	HOOD INDUSTRIES, INC. COUSHATTA SAWMILL	30.800	<u>WOOD LUMBER KILNS (INDIRECT FIRED)</u>	PSD-LA-708 07/13/2005
<input checked="" type="checkbox"/> AR-0080	DELTC TIMBER CORPORATION WALDO	30.800	<u>STEAM HEATED LUMBER DRYING KILNS</u>	697-AOP-R6 01/12/2005
<input checked="" type="checkbox"/> TX-0483	TEMPLE-INLAND FOREST PRODUCTS CORPORATION TEMPLE-INLAND DIBOLL OPERATIONS	30.800	<u>WEST LUMBER KILNS 1&2 (4)</u>	PSD-TX- 1008 11/01/2004
<input checked="" type="checkbox"/> LA-0180	WEST FRASER (SOUTH), INC. JOYCE MILL	30.800	<u>EAST LUMBER KILNS 1&2 (4) WOOD LUMBER KILNS (INDIRECT FIRED)</u>	PSD-LA-701 07/19/2004
<input checked="" type="checkbox"/> SC-0085	ELLIOT SAWMILLING COMPANY ELLIOT SAWMILLING COMPANY	30.800	<u>LUMBER DRYING KILN</u>	1280-0004- CH 05/23/2004
<input checked="" type="checkbox"/> SC-0090	NEW SOUTH LUMBER COMPANY, INC.	30.800	<u>LUMBER DRYING KILNS</u>	1340-0029 09/05/2003

	NEW SOUTH LUMBER COMPANY, INC.-CONWAY PLANT			
<input checked="" type="checkbox"/>	<u>LA-0187</u>	WEYERHAEUSER COMPANY HOLDEN WOOD PRODUCTS MILL	30.800 <u>KILN NO. 1 (1-79)</u>	PSD-LA-692 06/18/2003
			30.800 <u>KILN NO. 3 (1-89)</u>	
			30.800 <u>KILN NO. 4 (1-93)</u>	
			30.800 <u>KILN NO. 2 (2-79)</u>	
			30.800 <u>KILN NO. 5 (1-01)</u>	
<input checked="" type="checkbox"/>	<u>AL-0195</u>	BOWATER, INC. ALBERTVILLE SAWMILL	30.800 <u>STEAM-HEATED LUMBER DRY KILNS, (2)</u>	711-S001/UNIT 002 06/04/2003 1380-0025 03/07/2003
<input checked="" type="checkbox"/>	<u>SC-0082</u>	NEW SOUTH LUMBER COMPANY, INC.	30.800 <u>LUMBER DRYING KILNS, FIVE (5), STEAM-HEATED</u>	
<input checked="" type="checkbox"/>	<u>AR-0062</u>	NEW SOUTH LUMBER COMPANY, INC-CAMDEN PLANT GEORGIA-PACIFIC CORP.	30.800 <u>LUMBER DRYING KILN</u>	703-AOP-R1 11/07/2002
<input checked="" type="checkbox"/>	<u>AR-0065</u>	GEORGIA-PACIFIC CORP. - EL DORADO SAWMILL		
<input checked="" type="checkbox"/>	<u>AR-0065</u>	WEST FRAZIER (SOUTH), INC. WEST FRASER (SOUTH), INC. - HUTTIG MILL	30.800 <u>LUMBER DRYING KILN</u>	118-AOP-R2 11/07/2002
<input checked="" type="checkbox"/>	<u>AR-0064</u>	INTERNATIONAL PAPER COMPANY	30.800 <u>LUMBER DRYING KILN</u>	0057-AOP-R2
<input checked="" type="checkbox"/>	<u>*AL-0225</u>	LEOLA LUMBER MILL		11/01/2002
<input checked="" type="checkbox"/>	<u>SC-0059</u>	T.R. MILLER MILL COMPANY	30.800 <u>LUMBER DRY KILN</u>	502-S002 05/16/2002
<input checked="" type="checkbox"/>	<u>SC-0059</u>	T.R. MILLER MILL		
<input checked="" type="checkbox"/>	<u>SC-0059</u>	COLLUM'S LUMBER MILL	30.800 <u>KILN, 2 STEAM HEATED, LUMBER</u>	0160-0004-CR
<input checked="" type="checkbox"/>	<u>SC-0059</u>	COLLUM'S LUMBER MILL		04/08/2002
<input checked="" type="checkbox"/>	<u>MS-0048</u>	INTERNATIONAL PAPER COMPANY MORTON LUMBER MILL	30.800 <u>WOOD DRY KILN NO. 4</u>	2420-00031 09/05/2001
<input checked="" type="checkbox"/>	<u>SC-0070</u>	CHARLES INGRAM LUMBER COMPANY	30.800 <u>WOOD DRY KILNS, NO. 1, 2, & 3</u>	
<input checked="" type="checkbox"/>	<u>SC-0070</u>	CHARLES INGRAM LUMBER COMPANY	30.800 <u>DIRECT FIRED LUMBER DRYING KILN</u>	1040-0016-CB 08/15/2001
<input checked="" type="checkbox"/>	<u>AR-0046</u>	POTLATCH POTLATCH - OZAN UNIT	30.800 <u>LUMBER DRY KILN</u>	117-AOP-R1 (50-0001) 03/08/2001
<input checked="" type="checkbox"/>	<u>MS-0054</u>	WEYERHAEUSER COMPANY	30.800 <u>KILN, DRY LUMBER, AA-007</u>	2280-00050 12/28/2000
<input checked="" type="checkbox"/>	<u>TX-0292</u>	WEYERHAEUSER COMPANY	30.800 <u>KILNS, DRY LUMBER, 5</u>	
<input checked="" type="checkbox"/>	<u>TX-0292</u>	TEMPLE-INLAND FOREST PRODUCTS CORPORATION	30.800 <u>(4) KILNS 1-4, DRYING, SAWMILL, EPN101-104</u>	PSD-TX-924 08/06/2000
<input checked="" type="checkbox"/>	<u>SC-0050</u>	TEMPLE INLAND PINELAND MANUFACTURING COMPLEX		
<input checked="" type="checkbox"/>	<u>SC-0050</u>	CHESTERFIELD LUMBER COMPANY	30.800 <u>STEAM HEATED LUMBER DRYING KILN</u>	0820-0045 04/10/2000
<input checked="" type="checkbox"/>	<u>SC-0050</u>	CHESTERFIELD LUMBER COMPANY		
<input checked="" type="checkbox"/>	<u>SC-0052</u>	WILLAMETTE INDUSTRIES, INC.	30.800 <u>LUMBER DRY KILN</u>	0640-0013-CD-CH 09/30/1999
<input checked="" type="checkbox"/>	<u>FL-0217</u>	WILLAMETTE - CHESTER DIVISION		
<input checked="" type="checkbox"/>	<u>FL-0217</u>	CHAMPION INTERNATIONAL CORPORATION	30.800 <u>STEAM DRYING KILNS (3)</u>	PSD-FL-271 AND 0330260-001-AC
<input checked="" type="checkbox"/>	<u>GA-0122</u>	INTERNATIONAL PAPER		09/10/1999
<input checked="" type="checkbox"/>	<u>GA-0122</u>	RAYONIER, INC.	30.800 <u>LUMBER KILNS</u>	2421-001-0005-P-01-0 04/20/1999
<input checked="" type="checkbox"/>	<u>GA-0122</u>	RAYONIER		

Check

Un-Check

ALL Facilities

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FINAL

RBLC ID: AL-0195
Corporate/Company: BOWATER, INC.
Facility Name: ALBERTVILLE SAWMILL
Process: STEAM-HEATED LUMBER DRY KILNS, (2)

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: GOOD OPERATING PRACTICES, ROUTINE EQUIPMENT INSPECTIONS, RECORDKEEPING

Test Method: Unspecified

EPA/DAR Methods	All Other Methods
---------------------------------	-----------------------------------

Estimated % Efficiency:

Compliance Verified: Y

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 7.0000 LB/MBF

Emission Limit 2: 125000.0000 MBF/YR 2 UNITS COMBINED

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: VOC to be reported as pinene



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FINAL

RBLC ID: AL-0235

Corporate/Company: BOWATER (ALABAMA) INC. FOREST PRODUCT DIVISION

Facility Name: ALBERTVILLE SAWMILL

Process: TWO 182.14 MBF, STEAM-HEADED LUMBER DRY KILNS (NORTH & SOUTH - K100/K101)

Pollutant: Volatile Organic Compounds
 (VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P

P2/Add-on Description: OPERATE W/ WET BULB SET POINT DRYING SCHEDULE OF LESS THAN OR EQUAL TO 185F; DAILY AND MONTHLY KILN I/M PROCEDURES

Test Method: Unspecified

[EPA/QAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Other Factors Influence Decision: Unknown

Emission Limit 1: 7.0000 LB/MBF KILN CHARGE CYCLONE (PINENE)

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



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RBLC ID: FL-0217
Corporate/Company: CHAMPION INTERNATIONAL CORPORATION
Facility Name: INTERNATIONAL PAPER
Process: STEAM DRYING KILNS (3)

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
 Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: USE OF NATURAL GAS. OTHER CONTROL OF VOC NOT ECONOMICALLY FEASIBLE.

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified:
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: see note
Emission Limit 2:
Standardized:

COST DATA: Verified by Agency? No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes: Permit limit is controls only. ESTIMATED EMISSIONS 320 T/YR. NO EMISSION RATE LIMIT SET.



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FINAL

RBLC ID: FL-0217
Corporate/Company: CHAMPION INTERNATIONAL CORPORATION
Facility Name: INTERNATIONAL PAPER
Process: STEAM DRYING KILNS (3)

Primary Fuel:
Throughput: 225.00 MMBF/YR
Process Code: 30.800

Pollutant Information - List of Pollutants

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Pollutant	Primary Emission Limit	Basis	Verified
<u>Visible Emissions (VE)</u>	5 % OPACITY	BACT-PSD	
<u>Volatile Organic Compounds (VOC)</u>		BACT-PSD	

Process Notes: PM10 LIMIT BASED ON VE LIMIT FOR KILNS. PROPER OPERATION OF KILNS, NO OTHER CONTROLS FEASIBLE.



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FINAL

RBLC ID: SC-0050

Corporate/Company: CHESTERFIELD LUMBER COMPANY

Facility Name: CHESTERFIELD LUMBER COMPANY

Process: STEAM HEATED LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds
 (VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/QAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified:

EMISSION LIMITS:

Basis: LAER

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 353.5000 LB/D

Emission Limit 2: 64.5100 T/YR ROLL AVG.

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: SC-0059
Corporate/Company: COLLUM'S LUMBER MILL
Facility Name: COLLUM'S LUMBER MILL
Process: KILN, 2 STEAM HEATED, LUMBER

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: Y

EMISSION LIMITS:

Basis: LAER

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 195.0000 T/YR total for 2 kilns

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: Each Kiln has a VOC emissions limit of 97.5 t/yr, or 195 t/yr total for 2 kilns.



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FINAL

RBLC ID: AR-0080
Corporate/Company: DELTIC TIMBER CORPORATION
Facility Name: WALDO
Process: STEAM HEATED LUMBER DRYING KILNS

Primary Fuel:
Throughput:
Process Code: 30.800

Pollutant Information - List of Pollutants

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Pollutant	Primary Emission Limit	Basis	Verified
<u>Volatile Organic Compounds (VOC)</u>	3.5000 LB/MBF	BACT-PSD	UNKNOWN

Process Notes: 4 IDENTICAL KILNS AT 44.2 MMBF/YR AND ONE (1) KILN AT 48.3 MMBF/YR



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RBLC ID: AR-0080
Corporate/Company: DELTIC TIMBER CORPORATION
Facility Name: WALDO
Process: STEAM HEATED LUMBER DRYING KILNS

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision: Unknown
Emission Limit 1: 3.5000 LB/MBF
Emission Limit 2:
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates: 2005
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: SC-0085
Corporate/Company: ELLIOT SAWMILLING COMPANY
Facility Name: ELLIOT SAWMILLING COMPANY
Process: LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: p
P2/Add-on Description: WORK PRACTICES

Test Method: Unspecified [EPA/QAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: Y
EMISSION LIMITS:
Basis: LAER
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 4.5000 LB/1000 BF
Emission Limit 2:
Standardized:

COST DATA: **Verified by Agency?**No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes: Emission limit 1 units are lb/1000 board feet



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RBLC ID: AR-0062

Corporate/Company: GEORGIA-PACIFIC CORP.

Facility Name: GEORGIA-PACIFIC CORP. - EL DORADO SAWMILL

Process: LUMBER DRYING KILN

Pollutant Information - List of Pollutants

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Primary Fuel:
Throughput:
Process Code: 30.800

Pollutant	Primary Emission Limit	Basis	Verified
<u>Volatile Organic Compounds (VOC)</u>	5572 LB/CHARGE	Other Case-by-Case	
<u>Particulate Matter (PM)</u>	32.3000 LB/CHARGE	Other Case-by-Case	
<u>Particulate matter, filterable < 10 μ (FPM10)</u>	32.3000 LB/CHARGE	Other Case-by-Case	

Process Notes: SEVEN LUMBER DRYING KILNS ARE CURRENTLY IN OPERATION AT THE FACILITY - THREE OF THESE ARE NATURAL GAS-FIRED AND FOUR ARE STEAM-HEATED. STEAM FOR THE STEAM-HEATED KILNS IS SUPPLIED BY THE WOOD FIRED BOILER. THERE ARE TWO POSSIBLE SCENARIOS BEING CONSIDERED FOR INCREASING PRODUCTION. ONE SCENARIO INVOLVES MAINTAINING THE EXISTING SEVEN KILNS AND JUST ESTABLISHING A HIGHER PRODUCTION LEVEL OF 160 MILLION BOARD FEET ANNUALLY. THIS SAME SCENARIO WOULD INCREASE THE CURRENT FUEL-USE LIMIT ON THE BOILER FROM 78,900 TONS OF WOOD/BARK ANNUALLY TO 90,000 TONS, APPROXIMATELY REPRESENTING FULL UTILIZATION. A SECOND SCENARIO WOULD INVOLVE THE DEMOLISHING OF ONE OR MORE OF THE EXISTING KILNS (MOST LIKELY THE GAS-FIRED KILNS AND POSSIBLY ONE OF MORE STEAM-HEATED KILNS) AND REPLACING THEM WITH TWO OR THREE STEAM-HEATED KILNS. THE FINAL DECISION HAS NOT BEEN MADE REGARDING WHICH SCENARIO WILL BE IMPLEMENTED. BASED ON THE INFORMATION OBTAINED FROM THE APPLICATION, THE PERMIT HAS BEEN WRITTEN BASED ON THE FACILITY USING ONLY THE EXISTING EQUIPMENT (SCENARIO 1) AND BASED ON THE FACILITY INSTALLING 2 NEW KILNS, WITHOUT TAKING INTO CONSIDERATION THE DEMOLITION OF ANY EXISTING KILNS (SCENARIO 2).



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FINAL

RBLC ID: AR-0062
Corporate/Company: GEORGIA-PACIFIC CORP.
Facility Name: GEORGIA-PACIFIC CORP. - EL DORADO SAWMILL
Process: LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P

P2/Add-on Description: BACT FOR VOC EMISSIONS FROM THE KILN WOULD BE PROPER MAINTENANCE AND OPERATION OF THE DRYING KILN, SINCE ALL AVAILABLE CONTROL TECHNOLOGIES HAVE BEEN ELIMINATED DUE TO TECHNICAL INFEASIBILITY.

Test Method: Unspecified

EPA/ADR Methods	All Other Methods
---------------------------------	-----------------------------------

Estimated % Efficiency:

Compliance Verified:

EMISSION LIMITS:

Basis: Other Case-by-Case

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 5572.0000 LB/CHARGE Of Lumber

Emission Limit 2: 304.0000 T/YR

Standardized:

COST DATA: **Verified by Agency?** No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: AL-0163
Corporate/Company: GULF LUMBER COMPANY
Facility Name: GULF LUMBER COMPANY - MOBILE
Process: DRY KILNS

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: GOOD ENGINEERING PRACTICES

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified:
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 4.5200 LB/MBF
Emission Limit 2: 77.8000 T/YR
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:

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FINAL

RBLC ID: AL-0177
Corporate/Company: Gulf States Paper Corporation
Facility Name: MOUNDVILLE SAWMILL
Process: HIGH TEMP STEAM HEATED DRY KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:
Compliance Verified:
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 5.4800 LB/MBF
Emission Limit 2: 313.0000 MMBF/YR
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26378&Procnum=104565&poltnum=140677
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RBLC ID: LA-0181
Corporate/Company: HOOD INDUSTRIES, INC.
Facility Name: COUSHATTA SAWMILL
Process: WOOD LUMBER KILNS (INDIRECT FIRED)

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)
[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Other Factors Influence Decision: No

Emission Limit 1: 28.0000 LB/H HOURLY MAXIMUM

Emission Limit 2: 122.6000 T/YR ANNUAL MAXIMUM

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: EMISSION LIMITS ARE PER KILN (2).



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FINAL

RBLC ID: SC-0070

Corporate/Company: CHARLES INGRAM LUMBER COMPANY

Facility Name: CHARLES INGRAM LUMBER COMPANY

Process: DIRECT FIRED LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds
 (VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P

P2/Add-on Description: WORK PRACTICES CONSISTING OF DAILY, WEEKLY, MONTHLY, SEMI-ANNUAL, AND ANNUAL INSPECTION AND MAINTENANCE.

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified:

EMISSION LIMITS:

Basis: LAER

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 192.5000 T/YR

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/PolitDetl.cfm?facnum=25395&Procnum=101710&poltnum=132236
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 FINAL

RBLC ID: AR-0064
Corporate/Company: INTERNATIONAL PAPER COMPANY
Facility Name: LEOLA LUMBER MILL
Process: LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: Y
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 423.0000 LB/CHARGE Of Lumber
Emission Limit 2: 88.2000 T/YR
Standardized:

COST DATA: Verified by Agency? No
 Year Used in Cost Estimates:
 Cost Effectiveness:
 Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=23109&Procnum=93660&poltnum=117234
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FINAL

RBLC ID: MS-0048
Corporate/Company: INTERNATIONAL PAPER
Facility Name: INTERNATIONAL PAPER COMPANY MORTON LUMBER MILL
Process: WOOD DRY KILN NO. 4

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified [EPA/CAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified:
EMISSION LIMITS:
Basis: Other Case-by-Case
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 5.2000 LB/MBF
Emission Limit 2: 78.0000 T/YR
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/PolntDetl.cfm?facnum=26665&Procnum=106115&poltnum=145258
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DRAFT

RBLC ID: AL-0225
Corporate/Company: T.R. MILLER MILL COMPANY
Facility Name: T.R. MILLER MILL
Process: LUMBER DRY KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
 Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description: GOOD ENGINEERING PRACTICES

Test Method: Unspecified [EPA/DAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements: N/A
Other Factors Influence Decision: Unknown
Emission Limit 1: 6.7800 LB/MBF
Emission Limit 2:
Standardized:

COST DATA: Verified by Agency? No
 Year Used in Cost Estimates:
 Cost Effectiveness:
 Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=25331&Procnum=99778&poltnum=126471
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FINAL

RBLC ID: SC-0082
Corporate/Company: NEW SOUTH LUMBER COMPANY, INC.
Facility Name: NEW SOUTH LUMBER COMPANY, INC-CAMDEN PLANT
Process: LUMBER DRYING KILNS, FIVE (5), STEAM-HEATED

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: WORK PRACTICES AND PRODUCTION LIMIT

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: Y
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 4.2000 LB/MBF per 1000 board ft
Emission Limit 2: 182.1000 MMBF/YR Production Limit
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes: LAER (South Carolina Regulation 61-62.5, Standard No. 5.1) and BACT PSD Limits applied. production limit: 182.1 MILLION BOARD FEET/YR



http://cfpub.epa.gov/rblc/cfm/PolntDetl.cfm?facnum=25004&Procnum=98377&poltnum=123722
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FINAL

RBLC ID: AR-0046
Corporate/Company: POTLATCH
Facility Name: POTLATCH - OZAN UNIT
Process: LUMBER DRY KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: Y
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 3.5000 LB/MBF LB VOC/MBF
Emission Limit 2:
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26276&Procnum=104383&poltnum=140148
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FINAL

RBLC ID: AR-0083
Corporate/Company: POTLATCH CORPORATION
Facility Name: POTLATCH CORPORATION - OZAN UNIT
Process: KILNS 1-4

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: PROPER OPERATION

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency: 0
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis:
Other Applicable Requirements: OPERATING PERMIT
Other Factors Influence Decision: Unknown
Emission Limit 1: 3.5000 LB/MMBF
Emission Limit 2: 119.0000 LB/H
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates: 2005
Cost Effectiveness:
Incremental Cost Effectiveness: 0 \$/ton

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26218&Procnum=104164&poltnum=139583
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FINAL

RBLC ID: GA-0122
Corporate/Company: RAYONIER, INC.
Facility Name: RAYONIER
Process: LUMBER KILNS

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified

[EPA/CAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision: Unknown
Emission Limit 1: SEE NOTE
Emission Limit 2:
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates: 2005
Cost Effectiveness:
Incremental Cost Effectiveness: 0 \$/ton

Pollutant Notes: RACT WAS DETERMINED TO BE "NO CONTROLS" AND NO VOC LIMITS WERE SET.



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26474&Procnum=104869&poltnum=141413
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FINAL

RBLC ID: AL-0219

Corporate/Company: INTERNATIONAL PAPER COMPANY

Facility Name: INTERNATIONAL PAPER - MAPLESVILLE

Process: (3) 120 MBF HIGH TEMPERATURE, STEAM HEATED LUMBER DRY KILNS

Pollutant: Volatile Organic Compounds
(VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Other Factors Influence Decision: Unknown

Emission Limit 1: 4.9500 LB/MBF

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26396&Procnum=104610&poltnum=140744
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DRAFT

RBLC ID: WA-0327
Corporate/Company: SIERRA PACIFIC INDUSTRIES
Facility Name: SKAGIT COUNTY LUMBER MILL
Process: 7. DRY KILNS

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: COMPUTERIZED STEAM MANAGEMENT SYSTEM

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision: Unknown
Emission Limit 1: 54.0000 T/YR 12 MONTH ROLLING AVERAGE
Emission Limit 2:
Standardized:

COST DATA: Verified by Agency? No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



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Process Information - Details

For information about the pollutants related to this process, click on the specific pollutant in the list below.

[RBLC Home](#) [New Search](#) [Search Results](#) [Facility Information](#) [Process List](#) [Process Information](#)

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FINAL

RBLC ID: TX-0483
Corporate/Company: TEMPLE-INLAND FOREST PRODUCTS CORPORATION
Facility Name: TEMPLE-INLAND DIBOLL OPERATIONS
Process: WEST LUMBER KILNS 1&2 (4)

Pollutant Information - List of Pollutants

[Help?](#)

Primary Fuel:
Throughput:
Process Code: 30.800

Pollutant	Primary Emission Limit	Basis	Verified
<u>Volatile Organic Compounds (VOC)</u>	30.6000 LB/H	BACT-PSD	UNKNOWN
<u>Particulate matter, filterable < 10 μ (FPM10)</u>	0.9100 LB/H	BACT-PSD	UNKNOWN

Process Notes:



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FINAL

RBLC ID: TX-0483
Corporate/Company: TEMPLE-INLAND FOREST PRODUCTS CORPORATION
Facility Name: TEMPLE-INLAND DIBOLL OPERATIONS
Process: WEST LUMBER KILNS 1&2 (4)

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/AR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision: Unknown
Emission Limit 1: 30.6000 LB/H
Emission Limit 2: 85.3500 T/YR
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: TX-0483

Corporate/Company: TEMPLE-INLAND FOREST PRODUCTS CORPORATION

Facility Name: TEMPLE-INLAND DIBOLL OPERATIONS

Process: WEST LUMBER KILNS 1&2 (4)

Pollutant: Particulate matter, filterable < 10 μ (FPM10) **CAS Number:** PM
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision: Unknown

Emission Limit 1: 0.9100 LB/H

Emission Limit 2: 2.5300 T/YR

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: TX-0292

Corporate/Company: TEMPLE-INLAND FOREST PRODUCTS CORPORATION
Facility Name: TEMPLE INLAND PINELAND MANUFACTURING COMPLEX
Process: (4) KILNS 1-4, DRYING, SAWMILL, EPN101-104

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description: NO CONTROLS REQUIRED

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified:

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 11.4600 LB/H EACH UNIT

Emission Limit 2: 47.5000 T/YR EACH UNIT

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: FUGITIVE EMISSIONS ARE AN ESTIMATE ONLY AND SHOULD NOT BE CONSIDERED AS A MAXIMUM ALLOWABLE EMISSION RATE.



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FINAL

RBLC ID: TX-0292

Corporate/Company: TEMPLE-INLAND FOREST PRODUCTS CORPORATION
Facility Name: TEMPLE INLAND PINELAND MANUFACTURING COMPLEX
Process: (4) KILNS 1-4, DRYING, SAWMILL, EPN101-104

Pollutant: Particulate matter, filterable < 10 μ (FPM10) **CAS Number:** PM
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description: NO CONTROLS REQUIRED

Test Method: Unspecified [EPA/QAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified:
EMISSION LIMITS:
Basis: Other Case-by-Case
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 0.3400 LB/H EACH UNIT
Emission Limit 2: 1.4100 T/YR EACH UNIT
Standardized:

COST DATA: Verified by Agency? No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes: FUGITIVE EMISSIONS ARE AN ESTIMATE ONLY AND SHOULD NOT BE CONSIDERED AS A MAXIMUM ALLOWABLE EMISSION RATE. PM10 WAS NOT SUBJECT TO PSD REVIEW, BUT BACT IS STILL APPLIED.



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FINAL

RBLC ID: AR-0065

Corporate/Company: WEST FRAZIER (SOUTH), INC.

Facility Name: WEST FRASER (SOUTH), INC. - HUTTIG MILL

Process: LUMBER DRYING KILN

Pollutant: Volatile Organic Compounds
 (VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified:

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 3.5000 LB/MBF Million Board Feet

Emission Limit 2: 91.9000 LB/H

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



http://cfpub.epa.gov/rblc/cfm/Poltdetl.cfm?facnum=26737&Procnum=106329&poltnum=145946
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FINAL

RBLC ID: AL-0232

Corporate/Company: WEYERHAEUSER COMPANY

Facility Name: MILLPORT WOOD PRODUCTS FACILITY

Process: 110 MBF, HIGH TEMPERATURE, STEAM-HEATED LUMBER DRY KILN NO.3

Pollutant: Volatile Organic Compounds
 (VOC)

CAS Number: VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/ODAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Other Factors Influence Decision: Unknown

Emission Limit 1: 4.5200 LB/MBF VOC REPORTED AS TERPENES

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: 1. PERMIT ALSO CONTAINS ON SMS LIMIT FOR PM OF 0.066 LB/MBF. 2. AN INITIAL VOC COMPLIANCE TEST IS REQUIRED.



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FINAL

RBLC ID: AL-0215
Corporate/Company: WEYERHAEUSER COMPANY
Facility Name: PINE HILL WOOD PRODUCTS FACILITY
Process: 186 MBF HIGH TEMPERATURE, STEAM=HEATED LUMBER DRY KILN NO. 4 (WP-162)

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/CAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: UNKNOWN

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Other Factors Influence Decision: Unknown

Emission Limit 1: 4.5200 LB/MBF VOC EXPRESSED AS TERPENE

Emission Limit 2: 282.5000 T/YR VOC EXPRESSED AS TERPENE

Standardized:

COST DATA: **Verified by Agency?** No

Year Used in Cost Estimates: 2005

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes: 1) INITIAL VOC COMPLIANCE TEST REQUIRED, (2) NO. 4 KILN PRODUCTION LIMITED TO 125,000 MBF DURING ANY CONSECUTIVE 12-MONTH PERIOD, (3) PM SYNTHETIC MINOR EMISSION LIMITS OF 0.066 LB/MBF AND 4.13 TPY.



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FINAL

RBLC ID: OK-0113
Corporate/Company: WEYERHAEUSER
Facility Name: WRIGHT CITY COMPLEX
Process: LUMBER KILNS

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N
P2/Add-on Description:

Test Method: Unspecified

EPA/ADR Methods	All Other Methods
---------------------------------	-----------------------------------

Estimated % Efficiency:
Compliance Verified: UNKNOWN
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision: Unknown
Emission Limit 1: 4.8000 LB/MBF
Emission Limit 2:
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes: MULTIPLE VENTS/OPENINGS



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FINAL

RBLC ID: MS-0054
Corporate/Company: WEYERHAEUSER COMPANY
Facility Name: WEYERHAEUSER COMPANY
Process: KILN, DRY LUMBER, AA-007

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: THROUGHPUT LIMIT, NO ADD ON CONTROLS FEASIBLE.

Test Method: Unspecified [EPA/OAR Methods](#) [All Other Methods](#)

Estimated % Efficiency:
Compliance Verified: Y
EMISSION LIMITS:
Basis: BACT-PSD
Other Applicable Requirements:
Other Factors Influence Decision:
Emission Limit 1: 4.2000 LB/MBF lbs as carbon/mbf
Emission Limit 2: 73.5000 T/YR
Standardized:

COST DATA: **Verified by Agency?** No
Year Used in Cost Estimates:
Cost Effectiveness:
Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: MS-0054

Corporate/Company: WEYERHAEUSER COMPANY

Facility Name: WEYERHAEUSER COMPANY

Process: KILN, DRY LUMBER, AA-007

Pollutant: Particulate matter, filterable < 10 μ (FPM10) **CAS Number:** PM
Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P
P2/Add-on Description: GOOD COMBUSTION CONTROL. NO CONTROLS FEASIBLE.

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: Y

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 0.6100 LB/MBF

Emission Limit 2: 10.9000 T/YR

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:



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FINAL

RBLC ID: SC-0052
Corporate/Company: WILLAMETTE INDUSTRIES, INC.
Facility Name: WILLAMETTE - CHESTER DIVISION
Process: LUMBER DRY KILN

Pollutant: Volatile Organic Compounds (VOC) **CAS Number:** VOC

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: N

P2/Add-on Description:

Test Method: Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

Estimated % Efficiency:

Compliance Verified: Y

EMISSION LIMITS:

Basis: BACT-PSD

Other Applicable Requirements:

Other Factors Influence Decision:

Emission Limit 1: 3.8000 LB/MBF

Emission Limit 2:

Standardized:

COST DATA: Verified by Agency? No

Year Used in Cost Estimates:

Cost Effectiveness:

Incremental Cost Effectiveness:

Pollutant Notes:

Attachment H

**Baseline and Projected Actual Emissions Tables
and
Emissions Calculations**

NORTH FLORIDA LUMBER, INC.
FACILITY I.D. 077007
MODIFICATION OF KILN NO. 2
APRIL 30, 2009

24-MONTH BASELINE ACTUAL EMISSIONS: 1/1/2005 TO 12/31/2006

	UNITS	ACTUAL ANNUAL CY 2006	ACTUAL ANNUAL CY 2005	24-MONTH ANNUAL AVERAGE CY 2005 - 2006
CO	tpy	156.048	177.555	166.802
NOx	tpy	57.218	65.104	61.161
PM	tpy	93.163	105.964	99.564
PM ₁₀	tpy	83.314	94.792	89.053
SO ₂	tpy	6.762	7.694	7.228
VOC #	tpy	261.460	267.496	264.478
Methanol	tpy	8.433	8.590	8.512
Formaldehyde	tpy	5.395	5.495	5.445
Fuel use @	tpy	57,795.69	65,760.94	61,778.3
Bd-ft. equivalent	bd-ft	104,758,363	106,704,623	105,731,493

PSD pollutant is Total VOC

@ Fuel 9.0 MMBTU/ton

NORTH FLORIDA LUMBER, INC.
FACILITY I.D. 077007
MODIFICATION OF KILN NO. 2
MAY 6, 2009

PROJECTED ACTUAL EMISSIONS

	UNITS	EU 001	EU 002	EU 014	EU 015	ANNUAL
CO	tpy	114.845	84.621	0	0	199.466
NOx	tpy	42.110	31.028	0	0	73.138
PM	tpy	66.993	49.362	3.000	0	119.355
PM ₁₀	tpy	61.250	45.131	0.120	0	106.501
SO ₂	tpy	4.977	3.667	0	0	8.644
VOC	tpy	7.465	5.500	0	422.840	435.805
Methanol	tpy	0	0	0	14.168	14.168
Formaldehyde	tpy	0	0	0	9.064	9.064
Fuel use @	tpy	42,535.0	31,341.0	0	0	73,876.0
Bd-ft. equivalent	bd-ft	0	0	0	176,000,000	176,000,000

@ Fuel 9.0 MMBTU/ton

NORTH FLORIDA LUMBER, INC.
PSD BASELINE ACTUAL EMISSION CALCULATIONS
FACILITY I.D. # 0770007
APRIL 30, 2009

24-Month Baseline Period: January 1, 2005 – December 31, 2006
PSD-Significant Pollutant: VOC

1. 2005-2006 Boiler Fuel Consumption

2005 Boiler Fuel Consumption

EU 001: Boiler #1: 20,310.23 tpy + Boiler #3: 26,286.32 tpy = 46,596.55 tpy

EU 002 (Boiler #2): 19,164.39 tpy

Facility-wide: 65,760.94 tpy burned in 2005

2006 Boiler Fuel Consumption

EU 001: Boiler #1: 21,262.40 tpy + Boiler #3: 17,814.97 tpy = 39,077.37 tpy

EU 002 (Boiler #2): 18,718.32 tpy

Facility-wide: 57,795.69 tpy burned in 2006

24-month average fuel use:

$$(2005 + 2006) / 2: (65,760.94 + 57,795.69) / 2 = \underline{61,778.32 \text{ tpy}}$$

$$\text{Hog fuel BTU value: } 4500 \text{ BTU / lb; } \frac{2000 \text{ lb} \times 4500 \text{ BTU}}{\text{ton} \quad \text{lb}} = 9.0 \times 10^6 \text{ BTU / ton}$$

2. Emission Factors - From AP-42 Tables

AP-42, Tables 1.6-1, 2 & 3

0.60 lb CO / MMBTU;	9 x 0.60 = 5.4 lb CO / ton fuel	Table 1.6-2
0.22 lb NO _x / MMBTU;	9 x 0.22 = 1.98 lb NO _x / ton fuel	Table 1.6-2
0.026 lb SO ₂ / MMBTU;	9 x 0.026 = 0.234 lb SO ₂ / ton fuel	Table 1.6-2
0.32 lb PM ₁₀ / MMBTU;	9 x 0.32 = 2.88 lb PM ₁₀ / ton fuel	Table 1.6-1 controlled
0.35 lb PM / MMBTU;	9 x 0.35 = 3.15 lb PM / ton fuel	Table 1.6-1 controlled
0.038 lb VOC / MMBTU;	9 x 0.039 = 0.351 lb VOC / ton fuel	Table 1.6-3

3. 2005/2006 Average Boiler Emissions

All 3 boiler SCC Codes: 102-009-05 wood waste-fired boiler, <25,000 lb steam / hour

A. EU 001 (Boilers #1 & 3)

$$\frac{5.4 \text{ lb CO} \times 61,778.32 \text{ tons}}{\text{ton} \quad 2000 \text{ lb}} = 166.801 \text{ tpy CO}$$

$$\frac{1.98 \text{ lb NO}_x \times 61,778.32 \text{ tons}}{\text{ton} \quad 2000 \text{ lb}} = 61.161 \text{ tpy NO}_x$$

$$\frac{3.15 \text{ lb PM} \times 61,778.32 \text{ tons}}{\text{ton} \quad 2000 \text{ lb}} = 97.301 \text{ tpy PM}$$

$$\frac{2.88 \text{ lb PM}_{10} \times 61,778.32 \text{ tons ton}}{\text{ton } 2000 \text{ lb}} = 88.961 \text{ tpy PM}_{10}$$

$$\frac{0.351 \text{ lb VOC} \times 61,778.32 \text{ tons ton}}{\text{ton } 2000 \text{ lb}} = 10.842 \text{ tpy VOC}$$

$$\frac{0.234 \text{ lb SO}_2 \times 61,778.32 \text{ tons ton}}{\text{ton } 2000 \text{ lb}} = 7.228 \text{ tpy SO}_2$$

4. EU 014 - Sawmill Cyclone Emissions (PM / PM₁₀)

2006

2225.28 sawmill operating hours during 2006

Sawmill cyclone PM₁₀ emission factor: 0.08 lb PM₁₀ / hour sawmill equipment operated
Cyclone SCC Code 307-008-08

2.0 lb PM (TSP) / hour sawmill operation (AP-42 factor, DEP Emiss. Estimation Code 3)

$$\frac{2.0 \text{ lb PM} \times 2225.28 \text{ hr ton}}{\text{ton } 2000 \text{ lb}} = 2.225 \text{ tpy PM}$$

0.08 lb PM₁₀ / hour sawmill operation (AP-42 factor, DEP Emiss. Estimation Code 3)

$$\frac{0.08 \text{ lb PM}_{10} \times 2225.28 \text{ hr ton}}{\text{ton } 2000 \text{ lb}} = 0.089 \text{ tpy PM}_{10}$$

2005:

2389.9 sawmill –cyclone operating hours during 2005

$$\frac{2.0 \text{ lb PM} \times 2389.9 \text{ hr ton}}{\text{ton } 2000 \text{ lb}} = 2.390 \text{ tpy PM}$$

$$\frac{0.08 \text{ lb PM}_{10} \times 2389.9 \text{ hr ton}}{\text{ton } 2000 \text{ lb}} = 0.096 \text{ tpy PM}_{10}$$

EU 014: 2005/2006 Average PM Emissions = (2.225 + 2.390) / 2 = 2.308 tpy PM

EU 014: 2005/2006 Average PM₁₀ Emissions = (0.089 + 0.096) / 2 = 0.093 tpy PM₁₀

5. EU 015 - 2005/2006 Average Lumber & Pole Drying Kiln VOC/HAP Emissions

Pole drying: cubic feet: 1 ft³ = 12 bd-ft.

New FDEP-recommended emission factors:

4.644 lb VOCP / 1000 bd-ft

0.103 lb HCHO / 1000 bd-ft. 0.161 lb CH₃OH / 1000 bd-ft.

4.803 lb VOC_{Total} / 1000 bd-ft. (VOCP + HCHO + 0.36 x CH₃OH) (EPA-published emission factor)

2005 Lumber & Pole Drying

Lumber Kiln #1	52,363,747	bd-ft
Lumber Kiln #2	48,938,464	bd-ft
Pole Kiln #3	5,021,460	bd-ft equivalent (418,455 ft ³ x 12)
Pole Kiln #4	<u>380,952</u>	bd-ft equivalent (31,746 ft ³ x 12)
2005 Total	106,704,623	bd-ft equivalent

2006 Lumber & Pole Drying

Lumber Kilns #1& 2	100,069,619	bd-ft
Pole Kilns #3&4	<u>4,688,744</u>	bd-ft equivalent (390,728.69 ft ³ x 12)
2006 Total	104,758,363	bd-ft equivalent

2005 / 2006 Average: (106,704,623 + 104,758,363) / 2 = 105,731,493 bd-ft. equivalent

2005/2006 - 24-Month Average VOC/HAP Emissions

$$\frac{105,731,493 \text{ bd-ft} \times 4.803 \text{ lb VOC}_{\text{Total}}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} \text{ ton} = 253.914 \text{ tpy VOC}_{\text{Total}}$$

$$\frac{105,731,493 \text{ bd-ft} \times 0.161 \text{ lb CH}_3\text{OH}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} \text{ ton} = 8.511 \text{ tpy CH}_3\text{OH}$$

$$\frac{105,731,493 \text{ bd-ft} \times 0.103 \text{ lb HCHO}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} \text{ ton} = 5.445 \text{ tpy HCHO}$$

NORTH FLORIDA LUMBER, INC.
PROJECTED ACTUAL EMISSIONS (PAE)
FACILITY I.D. # 0770007
MAY 6, 2009

Boiler Fuel Consumption

EU 001: Boiler #1 rated 29.6 MMBTU/hr Boiler #3 rated 28.7 MMBTU/hr
 EU 001 total: 58.3 MMBTU/hr
 EU 002: Boiler #2 rated 42.9 MMBTU/hr

Hog fuel BTU value: 4500 BTU / lb; $\frac{2000 \text{ lb} \times 4500 \text{ BTU}}{\text{ton} \quad \text{lb}} = 9.0 \times 10^6 \text{ BTU} / \text{ton}$

All 3 boiler SCC Codes: 102-009-05 wood waste-fired boiler, <25,000 lb steam / hour

0.75 boiler utilization factor: EU 001 Fuel Use: 42,535 tpy EU002 Fuel Use: 31,341 tpy
Facility-wide fuel use = 42,535 + 31,341 = 73,876 tpy hog fuel

2. EU 001 Projected Actual Emissions (Boilers # 1 & # 3)

AP-42, Tables 1.6-1, 2 & 3

0.60 lb CO / MMBTU;	9 x 0.60 = 5.4 lb CO / ton fuel	Table 1.6-2
0.22 lb NO _x / MMBTU;	9 x 0.22 = 1.98 lb NO _x / ton fuel	Table 1.6-2
0.026 lb SO ₂ / MMBTU;	9 x 0.026 = 0.234 lb SO ₂ / ton fuel	Table 1.6-2
0.32 lb PM ₁₀ / MMBTU;	9 x 0.32 = 2.88 lb PM ₁₀ / ton fuel	Table 1.6-1 controlled
0.35 lb PM / MMBTU;	9 x 0.35 = 3.15 lb PM / ton fuel	Table 1.6-1 controlled
0.038 lb VOC / MMBTU;	9 x 0.039 = 0.351 lb VOC / ton fuel	Table 1.6-3

$$\frac{5.4 \text{ lb CO} \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 114.845 \text{ tpy CO}$$

$$\frac{1.98 \text{ lb NO}_x \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 42.110 \text{ tpy NO}_x$$

$$\frac{3.15 \text{ lb PM} \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 66.993 \text{ tpy PM}$$

$$\frac{2.88 \text{ lb PM}_{10} \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 61.250 \text{ tpy PM}_{10}$$

$$\frac{0.351 \text{ lb VOC} \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 7.465 \text{ tpy VOC}$$

$$\frac{0.234 \text{ lb SO}_2 \times 42,535 \text{ tons}}{\text{ton} \quad \text{yr} \quad 2000 \text{ lb}} = 4.977 \text{ tpy SO}_2$$

3. **EU 002 Projected Actual Emissions (Boiler # 2)**

$$\frac{5.4 \text{ lb CO} \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 84.621 \text{ tpy CO}$$

$$\frac{1.98 \text{ lb NOx} \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 31.028 \text{ tpy NOx}$$

$$\frac{3.15 \text{ lb PM} \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 49.362 \text{ tpy PM}$$

$$\frac{2.88 \text{ lb PM}_{10} \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 45.131 \text{ tpy PM}_{10}$$

$$\frac{0.351 \text{ lb VOC} \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 5.500 \text{ tpy VOC}$$

$$\frac{0.234 \text{ lb SO}_2 \times 31,341 \text{ tons}}{\text{ton yr} \quad 2000 \text{ lb}} = 3.667 \text{ tpy SO}_2$$

4. **EU 014 - Sawmill Cyclone Emissions (PM / PM₁₀)**

3000 operating hours/yr

Sawmill cyclone PM₁₀ emission factor: 0.08 lb PM₁₀ / hour sawmill equipment operated

Cyclone SCC Code 307-008-08

2.0 lb PM / hour sawmill operation (AP-42 factor)

0.08 lb PM₁₀ / hour sawmill operation (AP-42 factor)

$$\frac{2.0 \text{ lb PM} \times 3000 \text{ hr}}{\text{ton} \quad 2000 \text{ lb}} = 3.000 \text{ tpy PM}$$

$$\frac{0.08 \text{ lb PM}_{10} \times 3000 \text{ hr}}{\text{ton} \quad 2000 \text{ lb}} = 0.120 \text{ tpy PM}_{10}$$

5. **EU 015 Lumber & Pole Drying Kiln VOC & HAP Emissions**

Pole drying: 1 ft³ = 12 bd-ft.

FDEP-recommended emission factors:

4.644 lb VOCP / 1000 bd-ft

0.103 lb HCHO / 1000 bd-ft. 0.161 lb CH₃OH / 1000 bd-ft.

4.805 lb VOC_{Total} / 1000 bd-ft. (VOCP + HCHO + 0.36 x CH₃OH) (EPA-published emission factors)

Lumber Kilns #1&2 158,000,000 bd-ft

Pole Kilns #3 & 4 +18,000,000 bd-ft equivalent (1.5 x 10³ ft³ x 12 bd-ft/ft³)

Total 176,000,000 bd-ft equivalent

$$\frac{176,000,000 \text{ bd-ft} \times 4.805 \text{ lb VOC}_{\text{Total}} \text{ ton}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} = 422.84 \text{ tpy VOC}_{\text{Total}}$$

$$\frac{176,000,000 \text{ bd-ft} \times 0.161 \text{ lb CH}_3\text{OH} \text{ ton}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} = 14.168 \text{ tpy CH}_3\text{OH}$$

$$\frac{176,000,000 \text{ bd-ft} \times 0.103 \text{ lb HCHO} \text{ ton}}{1000 \text{ bd-ft} \quad 2000 \text{ lb}} = 9.064 \text{ tpy HCHO}$$

Attachment I

**Rule Applicability Analysis
and
Identification of Applicable Requirements**

Attachment I

Rule Applicability Analysis and Identification of Applicable Requirements

Facility is a Major Source of air pollutants	FAC 62-213
Facility is allowed to operated continuously, i.e. 8760 hours per year	FAC 62-4.160(2) and 62-210.200(PTE)
DEP to be notified at least 15 days in advance of kiln emissions testing	FAC 62-297.310(7)(a)4
20% general opacity limit, unregulated emissions units	FAC 62-296.320(4)(b)(1)
Lumber drying kiln process rates to be recorded	FAC 62-4.160(2) and 62-212.400(12)(b)
Unregulated emissions units	FAC 62-213.430(6)(b)(3, d)
Insignificant activities	FAC 62-210.300(3)(a, b)
Control of fugitive process particulate emissions	FAC 62-296.320(4)
Annual emission fee, based on carbon monoxide emissions	FAC 62-213.205(1)
Annual statement of compliance	FAC 62-213.440(3)
Excess emissions to be reported to DEP	FAC 62-210.700(1)

Attachment J

List of Insignificant Activities

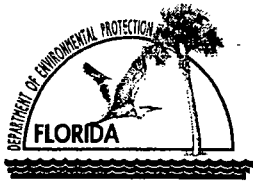
Attachment J

List of Insignificant Activities

- 1. Electric space heating for shop buildings (FAC 62-210.300(3)(a)(9))**
- 2. Package air conditioning and heating systems for offices (FAC 62-210.300(3)(a)(9))**
- 3. Aboveground storage tank and dispenser pump for diesel fuel (FAC 62-210.300(3)(a)(19))**
- 4. Production vehicle maintenance shop (FAC 62-210.300(3)(a)(16))**
- 5. Office supplies and copying equipment (FAC 62-210.300(3)(b)(1))**

Attachment K

Compliance Report



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

<input checked="" type="checkbox"/> Annual Requirement	<input type="checkbox"/> Transfer of Permit	<input type="checkbox"/> Permanent Facility Shutdown
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REPORTING PERIOD*	REPORT DEADLINE**
January 1 through December 31, 2008	April 27, 2009

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: North Florida Lumber, Inc.

Site Name: Bristol Sawmill Facility ID No. 0770007 County: Liberty

COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.


For each incident of deviation, as described in paragraph **B.** above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.



(Signature of Title V Source Responsible Official)

5-18-09
(Date)

Name: Kenny Sparks

Title: General Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

(Signature of Acid Rain Source Designated Representative)

(Date)

Name: _____

Title: _____

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency(EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

North Florida Lumber, Inc.
Facility I.D. 0770007
2008 Statement of Compliance
April 27, 2009

On October 15, 2008 Boiler No. 2 (EU 002) EPA Method 5 particulate stack test successfully complied with the 0.2 lb PM/MMBTU heat input met emissions limit at FAC 62-296.410(2)(b), Permit Condition B.8. The results of the test was 0.191 lb PM/MMBTU. The contract stack tester informed permittee of the results.