

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

NOTICE OF FINAL AIR PERMIT

Sent by Electronic Mail – Received Receipt Requested

Mr. Kenny Sparks, General Manager
North Florida Lumber, Inc.
P.O. Box 610
Bristol, FL 32321

Project No. 0770007-014-AC
Air Permit No. PSD-FL-407
North Florida Lumber, Inc.
Bristol Sawmill
Kiln 2 Expansion
Liberty County, Florida

Dear Mr. Sparks:

Enclosed is the final air construction permit, which authorizes the expansion of lumber drying Kiln 2 from 85 to 227 feet and its modification from a batch-process kiln to a triple length continuous (TLC) kiln. The maximum production capacity of Kiln 2 will increase from 59,000,000 board-feet per year to 92,000,000 board-feet per year. The proposed work will be conducted at the existing Bristol Sawmill, which is located in Liberty County near the intersection of Highway 12 South and Highway 67 in Bristol, Florida. As noted in the attached Final Determination, no changes were made to the draft permit. This final permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk/scd

NOTICE OF FINAL AIR PERMIT


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 9/15/09 to the persons listed below.

- Mr. Kenny Sparks, North Florida Lumber, Inc. (ksparks@rexnfl.com)
- Mr. Ed Harris, Ed Harris P.E. Services (edharrispe@suddenlink.net)
- Mr. Allan Hartlein, GMR & Associates, Inc. (ahartlein@gmrinc.net)
- Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Ana Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Victoria Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

9/15/09
(Date)

FINAL DETERMINATION

PERMITTEE

North Florida Lumber, Inc.
P.O. Box 610
Bristol, FL 32321

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0770007-014-AC
PSD-FL-407, Air Construction Permit
Bristol Saw Mill, Kiln 2 Expansion Project

This permit authorizes the expansion of lumber drying Kiln 2 and an increase in production.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on August 4, 2009. The applicant published the Public Notice in The Calhoun – Liberty Journal on August 12, 2009. The Department received the proof of publication on August 17, 2009.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Northwest District Office or the applicant. The following summarizes comments received from the EPA Region 4 Office on August 31, 2009 and the Department's response.

Comment: The preliminary determination should have contained an analysis as to whether or not PM₁₀ is a reasonable surrogate for PM_{2.5}.

Response: On September 16, 1997, EPA revised the national ambient air quality standards (AAQS) for particulate matter, which includes a new national AAQS for PM_{2.5}. As EPA mentioned in its guidance dated October 23, 1997, there are significant technical difficulties with respect to PM_{2.5} monitoring, emissions estimation and modeling. Florida did implement an ambient monitoring program for PM_{2.5}. The guidance recommended the use of PM₁₀ as a surrogate for PM_{2.5} in meeting New Source Review (NSR) requirements under the Clean Air Act, including the permit programs for Prevention of Significant Deterioration of Air Quality (PSD). Meeting these measures in the interim will serve as a surrogate approach for reducing PM_{2.5} emissions and protecting air quality. Florida is in the process of revising its State Implementation Plan to address the new PM_{2.5} AAQS, PSD significant emissions rates and ambient air quality impact thresholds for modeling analyses as required by EPA for approved states by 2011. Until state regulations support PSD preconstruction review for PM_{2.5} emissions, limiting PM₁₀ emissions and precursors of PM_{2.5} (e.g., SAM, SO₂ and NO_x) will be used as a surrogate as suggested by EPA's guidance memoranda.

For this project, there are no expected increases in actual emissions of SO₂ or NO_x, which are precursors of PM_{2.5}. In addition, the relatively small estimated increase in PM₁₀ emissions (4.5 tons per year) is from the handling and processing of additional logs, which is capable of being accommodated by the existing equipment and could have been deducted from the estimated emissions increase. The Department does not expect the project to cause adverse impacts related to PM_{2.5} emissions.

CONCLUSION

The final action of the Department is to issue the permit with no changes.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

North Florida Lumber, Inc.
P.O. Box 610
Bristol, FL 32321

Authorized Representative:
Mr. Kenny Sparks, General Manager

Air Permit No. 0770007-014-AC
Permit Expires: March 1, 2011

Bristol Saw Mill
Facility ID No. 0770007
Kiln 2 Modification

PROJECT AND LOCATION

This permit authorizes the expansion of lumber drying Kiln 2 from 85 to 227 feet and its modification from a batch-process kiln to a triple length continuous (TLC) kiln. The maximum production capacity of Kiln 2 will increase from 59,000,000 board-feet per year to 92,000,000 board-feet per year. The proposed work will be conducted at the existing Bristol Saw Mill, which is a lumber mill with Standard Industrial Classification No. 2421. The existing facility is located in Liberty County near the intersection of Highway 12 South and Highway 67 in Bristol, Florida. The UTM coordinates are Zone 16, 689.54 km East, and 3358.88 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The project is subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

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- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Joseph Kahn, Director
Division of Air Resource Management

9/15/09

(Date)

Florida Department of
Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management
Through: Trina Vielhauer, Bureau of Air Regulation
Jeff Koerner, New Source Review Section
From: Susan DeVore, New Source Review Section
Date: September 14, 2009
Subject: Final Air Permit No. 0770007-014-AC
North Florida Lumber, Inc.
Bristol Saw Mill

The final permit for this project is attached for your approval and signature, which authorizes the expansion of lumber drying Kiln 2 from 85 to 227 feet and its modification from a batch-process kiln to a triple length continuous (TLC) kiln. The maximum production capacity of Kiln 2 will increase from 59,000,000 board-feet per year to 92,000,000 board-feet per year. The work will be performed at the existing facility located in Liberty County near the intersection of Highway 12 South and Highway 67 in Bristol, Florida. The project results in a major source air construction permit and is subject to PSD preconstruction review.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk/scd

SECTION 2. ADMINISTRATIVE REQUIREMENTS

EXISTING FACILITY DESCRIPTION

North Florida Lumber, Inc. manufactures softwood lumber from southern yellow pine. The existing facility consists of: a log debarker; the saw mill; a planer mill; four steam-heated lumber-drying kilns (EU-015); three waste wood-fired boilers (EU-001 and EU-002); and waste wood handling and storage operations (EU-014). Pine logs are delivered to the facility via logging trucks. The logs are stored in the log storage yard until they are ready to be processed. The logs are debarked and conveyed into the sawmill building where they are cut into 8 to 16 feet lengths of lumber with the following dimensions: 5/4" x 6", 1" x 4", 2" x 4" and 2" x 10". A wet mist is applied to the saw blades for cooling and to minimize dust emissions. The lumber is automatically sorted by size and collected in corresponding piles that are dried in Kilns 1 and 2. Dried lumber is sent to the planer mill building for final dimensioning. Bark chips, sawdust, wood chips, and planer shavings are transported by conveyors and pneumatically. A series of cyclones controls particulate matter emissions from handling bark chips, sawdust, wood chips, and planer shavings. Except for some bark conveyors, conveyors are covered. Dried lumber is stored inside a building. The facility also receives debarked and peeled poles from an adjacent property owner, Apalachee Pole Company, which are dried in Kilns 3 and 4. The kiln-dried poles are transported back to Apalachee Pole Company for further processing. All kilns are heated with steam coils. The steam is produced by three boilers firing waste wood.

PROJECT DESCRIPTION

The proposed project will expand the length of existing lumber drying Kiln 2 from 85 to 227 feet and modify it from a batch-process kiln to a triple length continuous (TLC) kiln with a pre-conditioning chamber, drying chamber and post-conditioning chamber. For a TLC kiln, two streams of green lumber will enter at opposite ends of the kiln and travel in countercurrent directions, which allow incoming green lumber to be preheated by the outgoing dry lumber. Heat is provided by a bank of steam coils located between the lumber trams and two banks of steam coils hung from the roof. The green wood slowly advances on trams through the kiln from pre-conditioning to drying to post-conditioning and emerges 36 hours later at the other end as dry lumber. In addition to moisture, the kiln drives off volatile organic compounds (VOC), methanol and formaldehyde from the sap in the green lumber. The maximum production capacity of Kiln 2 will increase from 59,000,000 board-feet per year to 92,000,000 board-feet per year.

The project affects only the existing steam-heated lumber drying kilns (EU-015). Only Kiln 2 will be physically modified. No other changes are proposed for the waste wood-fired boilers (EU-001 and EU-002) or the waste wood handling and storage operations (EU-014). Based on an emission factor of 5.36 lb VOC/1000 board-feet per year of lumber dried, the Kiln 2 expansion project results in a potential increase in VOC emissions of approximately 117 tons/year and is subject to PSD preconstruction review.

REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The project includes emissions units subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) in Subpart DDDD (Plywood and Composite Wood Products).

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate shall be submitted to the Department's Northwest District Office at: 160 Governmental Center, Suite 308, Pensacola, Florida 32502-5794 (Phone: 850-595-8300).
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at: 160 Governmental Center, Suite 308, Pensacola, Florida 32502-5794 (Phone: 850-595-8300).
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Implementation Plan for Kiln 2 Best Operating Practices).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
 - (a) Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (c) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

8. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Lumber Drying Kilns (EU-015)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
015	Four Steam-Heated Drying Kilns, Kilns 1 – 4 (Only Kiln 2 is being modified.)

{Permitting Note: In accordance with Rule 62-212.400(PSD), F.A.C., the above emission unit is subject to Best Available Control Technology (BACT) determination for VOC emissions.}

OPERATING PRACTICE

1. **Modification:** This permit authorizes the modification of Kiln 2 from a batch-process kiln to a triple-length continuous (TLC) kiln. The length of Kiln 2 will be expanded from 85 feet to 227 feet long to include pre-conditioning, drying and post-conditioning chambers. Both ends of the kiln will be open to allow dual lumber trams to travel in countercurrent directions. Miscellaneous equipment will be added and modified including foundations, electrical work, controllers, fans, baffles, shrouds, ductwork, motor control center, new lumber carts, etc. [Application and Design]

PERFORMANCE REQUIREMENTS

2. **Permitted Capacities:** The maximum drying rate for each kiln shall not exceed the following:
 - a. Kiln 1: 66,000,000 board-feet per 12-month rolling period;
 - b. Kiln 2: 92,000,000 board-feet per 12-month rolling period;
 - c. Kiln 3: 9,000,000 board-feet per 12-month rolling period (equivalent to 750,000 cubic feet per 12-month rolling period); and
 - d. Kin 4: 9,000,000 board-feet per 12-month rolling period (equivalent to 750,000 cubic feet per 12-month rolling period).[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
3. **Restricted Operation:** The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
4. **Waste Wood Heating Value:** During the months of January and July of each year, the permittee shall obtain a representative sample of waste wood fired in the boilers. The results shall be available within 45 days of taking the sample. Each representative sample shall be analyzed for the moisture content (% by weight) and heating value (Btu/lb, as-fired). Until four analyses have been determined, the actual heating value of the waste wood (as-fired) shall be the average of the available site-specific analyses. Once four analyses have been conducted, the actual heating value shall be determined from the most recent four analyses. In addition, once four analyses have been completed, the sampling frequency shall be reduced to once per year with a sample collected in July of each year. The actual average heating value (as-fired) determined from the analyses shall be used in all calculations for the heat input rates and waste wood charging rates for the boilers. The permittee shall use the following methods or other equivalent methods for sampling and analysis of waste wood: preparation of composite fuel samples (ASTM E1757); determining heat content (ASTM E711); and determining moisture content (ASTM E871). [Rule 62-4.070(30), F.A.C.]

BEST OPERATING PRACTICES

5. **Best Operating Practices for Kiln 2:** The permittee shall operate Kiln 2 in accordance with the following

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Lumber Drying Kilns (EU-015)

best operating practices.

- a. Minimize over-drying the lumber;
- b. Maintain consistent moisture content for the processed lumber charge; and
- c. Dry at the minimum temperature for the given lumber charge.

The permittee shall develop and operate in accordance with a written plan to implement the above best operating practices. See Appendix D for the initial implementation plan. The Title V air operation permit shall include the above best operating practices, but need not include the implementation plan. The permittee may change the implementation plan by submitting a request in accordance with Rule 62-213.410(2), F.A.C. at least 7 days prior to implementing the change.

{Permitting Note: For the Kiln 2 modification, the Department determined the BACT for VOC emissions to be the above best operating practices for Kiln 2.} [Rule 62-212.400(BACT), F.A.C.]

RECORDS AND REPORTS

6. Processing Records: Within at least 10 days following each calendar month, the permittee shall record the following information in a written log:
 - a. The amount of wood dried in each kiln (board-feet) for the previous calendar month; and
 - b. The amount of wood dried in each kiln (board-feet) for the previous 12 calendar months of operation.

The records shall be maintained in a written (or electronic) log available for inspection by the Compliance Authority. [Rule 62-4.070(3), F.A.C.]

7. Annual Operating Reports: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year to summarize operation for the previous calendar year.
{Permitting Note: The permittee should use the best available data for reporting emissions from the kilns. Based on currently available data, the VOC emission factor for the kilns is 5.36 lb VOC/1000 board-feet. This is based on National Council for Air and Stream Improvement (NCASI) Bulletin 845 for similar steam-heated kilns measured with EPA Method 26A, corrected from carbon to propane, and corrected for a response factor of 35% for methanol and a response factor of 0% for formaldehyde.} [Rule 62-210.370(3), F.A.C.]

NESHAP PROVISIONS

8. NESHAP Subpart DDDD: The facility is subject to NESHAP Subpart DDDD in 40 CFR 63. Pursuant to §63.2232(b), "The affected source includes lumber kilns at PCWP (Plywood and Composite Wood Products) and manufacturing facilities and at any other kind of facility." However, §63.2252 states that, "For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b)." Therefore, the lumber kilns are subject to NESHAP Subpart DDDD in 40 CFR 63 and the permittee shall comply with the initial notification requirements in §63.9(b).

SECTION 4. APPENDICES

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Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Implementation Plan for Kiln 2 Best Operating Practices

SECTION 4. APPENDIX A
CITATION FORMATS AND GLOSSARY OF COMMON TERMS

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CO: carbon monoxide

COMS: continuous opacity monitoring system

SECTION 4. APPENDIX A

CITATION FORMATS AND GLOSSARY OF COMMON TERMS

DEP: Department of Environmental Protection	NESHAP: National Emissions Standards for Hazardous Air Pollutants
Department: Department of Environmental Protection	NO_x: nitrogen oxides
dscfm: dry standard cubic feet per minute	NSPS: New Source Performance Standards
EPA: Environmental Protection Agency	O&M: operation and maintenance
ESP: electrostatic precipitator (control system for reducing particulate matter)	O₂: oxygen
EU: emissions unit	Pb: lead
F.A.C.: Florida Administrative Code	PM: particulate matter
F.D.: forced draft	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
F.S.: Florida Statutes	PSD: prevention of significant deterioration
FGR: flue gas recirculation	psi: pounds per square inch
Fl: fluoride	PTE: potential to emit
ft²: square feet	RACT: reasonably available control technology
ft³: cubic feet	RATA: relative accuracy test audit
gpm: gallons per minute	SAM: sulfuric acid mist
gr: grains	scf: standard cubic feet
HAP: hazardous air pollutant	scfm: standard cubic feet per minute
Hg: mercury	SIC: standard industrial classification code
hp: horsepower	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
I.D.: induced draft	SO₂: sulfur dioxide
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	UTM: Universal Transverse Mercator coordinate system
MACT: maximum achievable technology	VE: visible emissions
MMBtu: million British thermal units	VOC: volatile organic compounds
MSDS: material safety data sheets	
MW: megawatt	

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 624.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S.. Such evidence

SECTION 4. APPENDIX B
GENERAL CONDITIONS

shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (applicable);
 - b. Determination of Prevention of Significant Deterioration (applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) *The analytical techniques or methods used; and*
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C
COMMON CONDITIONS

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

{Permitting Note: Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any NSPS or NESHAP provision.}

RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDIX D

IMPLEMENTATION PLAN FOR KILN 2 BEST OPERATING PRACTICES

1. The operator shall minimize over-drying lumber with the following methods.
 - a. Set the charge target moisture content relative to the industry lumber grade requirement and/or customer required moisture content at the maximum value possible that will not result in an unacceptable redry rate.
 - b. Maintain records of the actual charge average moisture content and compute a monthly average. Calculate the monthly over-dry percent and adjust operations to minimize the amount of over-dry.
 - c. Maintain kiln components (baffles, fans, vents, steam heating coils, and kiln controls) to provide reasonably uniform temperatures and air flow throughout the kiln.
 - d. Periodically, reverse the air flow direction in the kiln to improve uniform drying and reduce over-drying.
 - e. Maintain records of the kiln conditions for each charge dried, including dry bulb temperature, wet bulb temperature, relative humidity and drying time.
2. The operator shall maintain consistent moisture content for the processed lumber charge with the following methods.
 - a. Maintaining proper stacking and spacer stick placement to provide adequate air flow throughout the charge.
 - b. Properly maintaining critical kiln components such as baffles, fans, vents, steam heating coils and kiln controls to provide reasonably uniform temperatures and air flow throughout the kiln.
 - c. Periodically, reversing the air flow direction in the kiln to improve uniform drying and reduce over-drying.
 - d. Maintaining records of the piece-to-piece moisture content variability for each charge including the mean and standard deviation of the data. Tracking mean values and standard deviations on a monthly and 12-month rolling basis.
3. The operator shall dry lumber at the minimum temperature by monitoring and recording thermocouple readings at various locations inside the kiln to identify and prevent "hot spots" that are above the maximum target drying temperature of 250° F.
4. The owner or operator may change this implementation plan by submitting a request in accordance with Rule 62 213.410(2), F.A.C. at least 7 days prior to implementing the change. This air construction permit does not need to be revised to change the implementation plan. [Rule 62-4.070(3), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, September 15, 2009 1:37 PM
To: 'ksparks@rexnl.com'
Cc: 'edharrispe@suddenlink.net'; 'ahartlein@gmrinc.net'; Bradburn, Rick; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; 'loquendo.ana@epa.gov'; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR); Koerner, Jeff
Subject: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407)
Attachments: 0770007-014-AC_Signatures.pdf

Dear Sir/ Madam:

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Click on the following link to access the documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0770007.014.AC.F_pdf.zip

Owner/Company Name: NORTH FLORIDA LUMBER
Facility Name: NORTH FLORIDA LUMBER
Project Number: 0770007-014-AC/ PSD-FL-407
Permit Status: FINAL
Permit Activity: CONSTRUCTION/ Kiln No. 2 Modification
Facility County: LIBERTY
Processor: Susan DeVore

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

Livingston, Sylvia

From: Kenny Sparks [ksparks@rexnfl.com]
Sent: Tuesday, September 15, 2009 2:29 PM
To: Livingston, Sylvia
Subject: RE: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407)

I am able to access the documents.

Kenny Sparks

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, September 15, 2009 1:37 PM
To: ksparks@rexnfl.com
Cc: edharrispe@suddenlink.net; ahartlein@gmrinc.net; Bradburn, Rick; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR); Koerner, Jeff
Subject: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407)

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Livingston, Sylvia

From: Abrams.Heather@epamail.epa.gov
Sent: Tuesday, September 15, 2009 1:46 PM
To: Livingston, Sylvia
Subject: Re: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407)

Received and opened.

Heather Abrams
Air Permits Section
U.S. EPA - Region 4
61 Forsyth St. SW
Atlanta, Georgia 30303

Phone: 404-562-9185
Fax: 404-562-9019

From: "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>
To: <ksparks@rexnfl.com>
Cc: <edharrispe@suddenlink.net>, <ahartlein@gmrinc.net>, "Bradburn, Rick" <Rick.Bradburn@dep.state.fl.us>, Kathleen Forney/R4/USEPA/US@EPA, Heather Abrams/R4/USEPA/US@EPA, Ana Oquendo/R4/USEPA/US@EPA, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "DeVore, Susan" <Susan.DeVore@dep.state.fl.us>, "Walker, Elizabeth \ (AIR\)" <Elizabeth.Walker@dep.state.fl.us>, "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>
Date: 09/15/2009 01:37 PM
Subject: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407)

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Livingston, Sylvania

From: Livingston, Sylvania
Sent: Tuesday, September 15, 2009 4:54 PM
To: 'ksparks@rexnfl.com'
Cc: 'edharrispe@suddenlink.net'; 'ahartlein@gmrinc.net'; Bradburn, Rick; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407) - File Resent with Corrected Signature Pages
Attachments: 0770007-014-AC_Signatures.pdf

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Kenny Sparks [ksparks@rexnfl.com]
Sent: Tuesday, September 15, 2009 5:04 PM
To: Livingston, Sylvia
Subject: RE: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407) - File Resent with Corrected Signature Pages

I can view the documents.

Kenny Sparks

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, September 15, 2009 4:54 PM
To: ksparks@rexnfl.com
Cc: edharrispe@suddenlink.net; ahartlein@gmrinc.net; Bradburn, Rick; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407) - File Resent with Corrected Signature Pages

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Livingston, Sylvania

From: Ed Harris [edharrispe@suddenlink.net]
Sent: Tuesday, September 22, 2009 2:11 PM
To: Livingston, Sylvania
Subject: Re: North Florida Lumber, Inc. - Bristol Saw Mill ; 0770007-014-AC (PSD-FL-407) - File Resent with Corrected Signature Pages

On 9/15/09 3:54 PM, "Livingston, Sylvania" <Sylvia.Livingston@dep.state.fl.us> wrote:

Dear Sir/ Madam:

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Owner/Company Name: NORTH FLORIDA LUMBER

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Permit Status: FINAL

Permit Activity: CONSTRUCTION/ Kiln No. 2 Modification

Facility County: LIBERTY

Processor: Susan DeVore

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Sylvia Livingston
Bureau of Air Regulation
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850/921-9506
sylvia.livingston@dep.state.fl.us

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The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey
<http://survey.dep.state.fl.us/?refemail=Sylvia.Livingston@dep.state.fl.us> . Thank you in advance for completing the survey.