

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
CENTRAL DISTRICT  
3319 MAGUIRE BOULEVARD, SUITE 232  
ORLANDO, FLORIDA 32803-3767

ROUTING AND TRANSMITTAL FORM

TO: (NAME, OFFICE, LOCATION)

**Bruce Mitchell, ENV ADM**

**ARM BAR TL MAGNO MS 5505**

*BB*  
*Boulton, File Jester*

**RECEIVED**

OCT 08 1997

BUREAU OF  
AIR REGULATION

FROM: Theresa Bouldin  
Air Resources Management  
Permitting  
Central District  
Florida Department of  
Environmental Protection

PHONE: SunCom 325-3334  
(407) 893-3334

DATE: October 7, 1997

## STATEMENT OF BASIS

Royal Oak Enterprises  
Ocala Charcoal Manufacturing Facility  
**Facility ID No.:** 0830010  
Marion County

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 0830010-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of a charcoal manufacturing operation which includes the following emission units:

- E.U. 001 - Herreshoff Retort Carbonizer Furnace used to convert wood to wood char and equipped with an afterburner to control particulate emissions.
- E.U. 006 - Char Hopper and Mill equipped with a Mikro-Pulsaire 1F-4/69-H-739 baghouse to control particulate emissions.
- E.U. 005 - 3 Hoppers, 4 Storage Silos, and a Hammer Mill; the hoppers and mill are equipped with a Microphase Model 80-F3 baghouse to control particulate emissions.
- E.U. 007 - Briquetting Tanks/Elevator/Screen and 2 Bagging Machines; the tanks/elevator/screen and two bagging machines are equipped with a National Air Systems Model RJ-TB-384-206-10 baghouse to control particulate emissions.
- E.U. 008 - One Bagging Machine; equipped with a Mikro-Pulsaire 1F-4/70-H-2761 baghouse to control particulate emissions.
- E.U. 004 - Briquetting Press Room and Dryer equipped with aluminum mesh filters to control particulate emissions.

The applicable emission limitations are as follows:

- a) E.U. 001 - incinerator VE limit per Rule 62-296.401(1)(a), F.A.C.
- b) E.U. 006, 005, 007, 004, 008 - general VE limit per Rule 62-296.320(4)(b)1., F.A.C.
- c) Facility-wide - general VOC standard per Rule 62-296.320(1)(a), F.A.C., objectionable odor prohibited per Rule 62-296.320(2), F.A.C., and precautions to prevent unconfined particulate emissions Rule 62-296.320(4)(c)2., F.A.C.

Also included in this permit are miscellaneous exempt emission units and/or activities.

Based on the initial Title V permit application received May 28, 1997, this facility is not a major source of hazardous air pollutants (HAPs).



# Department of Environmental Protection

Lawton Chiles  
Governor

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Virginia B. Wetherell  
Secretary

CERTIFIED MAIL

P 173 655 863

Dan Swearingen,  
Vice President  
Royal Oak Enterprises  
1921 NW 17th Place  
Ocala, Florida 34475

Re: DRAFT Title V Permit No: 0830010-003-AV  
Ocala Charcoal Manufacturing Facility

Dear Mr. Swearingen:

One copy of the DRAFT Title V Air Operation Permit for the Ocala Charcoal Manufacturing Facility, located at 1921 NW 19th Place, Ocala, Marion County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Alan Zahm P.E., at the above letterhead address. If you have any other questions, please contact John Turner at 407/893-3334.

Sincerely,

L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

LTK/jt  
Enclosures

**RECEIVED**

**OCT 08 1997**

**BUREAU OF  
AIR REGULATION**

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

In the Matter of an  
Application for Permit by:

Royal Oak Enterprises  
1921 NW 17th Place  
Ocala, Florida 34475  
Attention: Dan Swearingen  
Vice President

DRAFT Permit No.: 0830010-003-AV  
Ocala Charcoal Manufacturing Facility  
Marion County

**INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Royal Oak Enterprises, applied on May 28, 1997, to the permitting authority for a Title V air operation permit for the Ocala Charcoal Manufacturing Facility located at 1921 NW 17th Place, Ocala, Marion County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803, Telephone: 407/894-7555, Fax: 407/897-5963 within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, Telephone: 850/488-9730, Fax: 850/487-4938. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
  - (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
  - (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
  - (d) A statement of the material facts disputed by the petitioner, if any;
  - (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
  - (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action;
- and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;

- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

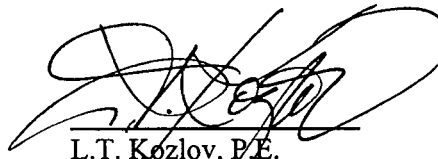
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M. Street SW, Washington, D.C. 20460.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 10/7/97 to the person(s) listed:

Dan Swearingen, Vice President  
Royal Oak Enterprises  
1921 NW 17th Place  
Ocala, Florida 34475

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed, or as otherwise noted:

Joseph A. Kowalski, P.E.  
K2 Engineering, Inc.  
7407 U.S. Hwy. 301 S., Suite 100  
Riverview, Florida 33569-4385

Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

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

Ann Jones      Oct 7, 1997  
Clerk                          Date

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

Florida Department of Environmental Protection  
Central District

Title V DRAFT Permit No.: 0830010-003-AV  
Ocala Charcoal Manufacturing Facility  
Marion County

The Florida Department of Environmental Protection, Central District (permitting authority) gives notice of its intent to issue a Title V air operation permit to Royal Oak Enterprises located at 1921 NW 17th Place, Ocala, Marion County. The facility has a charcoal manufacturing operation which includes a retort carbonizer, char house and char mill, three hoppers, a hammer mill, four storage silos, briquetting tanks/elevator screen, three bagging machines, and a briquette press room and dryer. The applicant's name and address are: Royal Oak Enterprises, 1921 NW 17th Place, Ocala, Florida 34475, to the attention of Dan Swearingen, Vice President.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, Telephone: 850/894-7555, Fax: 850/897-5963. Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any; ...



(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M. Street SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Florida Department of Environmental Protection  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803  
Telephone: 407/894-7555  
Fax: 407/897-5963

The complete project file includes the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Alan Zahm P.E., at the above address, or call 407/893-3334, for additional information.

Royal Oak Enterprises  
Ocala Charcoal Manufacturing Facility  
**Facility ID No.:** 0830010  
Marion County

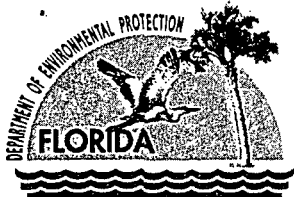
Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 0830010-003-AV

Permitting Authority:  
Florida Department of Environmental Protection  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803  
Telephone: 407/893-3334  
Fax: 407/897-5963

Initial Title V Air Operation Permit  
DRAFT Permit No.: 0830010-003-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2
Subsection A. Facility Description.	
Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
Subsection C. Relevant Documents.	
II. Facility-wide Conditions .....	3
III. Emissions Unit(s) and Conditions	
Subsection A. 001 - Retort Carbonizer.....	5
006 - Char House and Char Mill.....	5
005 - 3 Hoppers, 4 Storage Silos, and a Hammer Mill.....	5
007 - Briquetting Tanks/Elevator/Screen & 2 Bagging Machines.....	5
008 - One Bagging Machine.....	5
004 - Briquette Press Room & Dryer.....	5
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers	
Appendix E-1, List of Exempt Emission Units and/or Activities	
Appendix H-1, Permit History/ID Number Changes	
Appendix TV-1, Title V Conditions	



# Department of Environmental Protection

Lawton Chiles  
Governor

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Virginia B. Wetherell  
Secretary

**Permittee:**  
Royal Oak Enterprises  
1921 NW 17th Place  
Ocala, Florida 34475

**DRAFT Permit No.:** 0830010-003-AV  
**Facility ID No.:** 0830010  
**SIC Nos.:** 24  
**Project:** Initial Title V Air  
Operation Permit

Atten: Dan Swearingen,  
Vice President

This permit is for the operation of the Ocala Charcoal Manufacturing Facility. This facility is located at 1921 NW 17th Place, Ocala, Marion County; UTM Coordinates: Zone 17, 387.5 km East and 3231.1 km North; Latitude: 29° 12' 30" North and Longitude: 82° 09' 15" West.

**STATEMENT OF BASIS:** This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix E-1, List of Exempt Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 8/11/97)

**Effective Date:**  
**Renewal Application Due Date: November 30, 2001**  
**Expiration Date: May 30, 2002**

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

---

L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

LTK/jt

## Section I. Facility Information.

### Subsection A. Facility Description.

This facility consists of a charcoal manufacturing operation which includes the following emission units:

- a) Herreshoff Retort Carbonizer Furnace used to convert wood to wood char and equipped with an afterburner to control particulate emissions.
- b) Char Hopper and Mill equipped with a Mikro-Pulsaire 1F-4/69-H-739 baghouse to control particulate emissions.
- c) 3 Hoppers, 4 Storage Silos, and a Hammer Mill; the hoppers and mill are equipped with a Microphase Model 80-F3 baghouse to control particulate emissions.
- d) Briquetting Tanks/Elevator/Screen and 2 Bagging Machines; the tanks/elevator/screen and two bagging machines are equipped with a National Air Systems Model RJ-TB-384-206-10 baghouse to control particulate emissions.
- e) One Bagging Machine; equipped with a Mikro-Pulsaire 1F-4/70-H-2761 baghouse to control particulate emissions.
- f) Briquetting Press Room and Dryer equipped with aluminum mesh filters to control particulate emissions.

Also included in this permit are miscellaneous exempt emission units and/or activities .

Based on the initial Title V permit application received May 28, 1997, this facility is not a major source of hazardous air pollutants (HAPs).

### Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

#### E.U. ID No./Brief Description

001	Retort Carbonizer
006	Char House and Mill
005	3 Hoppers, 4 Storage Tanks, and a Hammer Mill
007	Briquetting Tanks/Elevator/Screen and 2 Bagging Machines
008	One Bagging Machine
004	Briquette Press and Dryer

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s)..on all correspondence, test report submittals, applications, etc.

### Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received May 28, 1997.

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 8/11/97), is a part of this permit. APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.

2. **Not Federally Enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:  
a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and  
b. certification forms and/or RMPs according to the promulgated rule schedule.  
[40 CFR 68]

5. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

6. **Not Federally Enforceable.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to 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. To comply, procedures to minimize pollutant emissions shall include the following:

- a) tightly cover or close all VOC containers when they are not in use,
- b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
- c) maintain all piping, valves, fittings, etc. in good operating condition,
- d) prevent excessive air turbulence across exposed VOC's,
- e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

7. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include the following on an as-needed basis:

- a) Application of water to control emissions.
- b) Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate emissions.
- c) Wood waste is wetted down with water sprays to prevent gusty winds from making the fine wood particles airborne.
- d) Charcoal fines on conveyors and in storage areas are wetted down with water sprays to prevent gusty winds from making the particles airborne.
- e) A regular housekeeping program is established to clean areas where fine wood and/or charcoal particles accumulate. All this material is collected and recycled.

[Rule 62-296.320(4)(c)2., F.A.C. and operating permit 0830010-001-AO]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the air compliance section of this office:

Florida Department of Environmental Protection  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803  
Telephone: 407/893-3334  
Fax: 407/897-5963

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Operating Permits Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9095

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions unit(s).**

**E.U. ID No./ Brief Description**

001 - Herreshoff Retort Carbonizer Furnace used to convert wood to wood char and equipped with an afterburner to control particulate emissions.

006 - Char Hopper and Mill equipped with a Mikro-Pulsaire 1F-4/69-H-739 baghouse to control particulate emissions.

005 - 3 Hoppers, 4 Storage Silos, and a Hammer Mill; the hoppers and mill are equipped with a Microphase Model 80-F3 baghouse to control particulate emissions.

007 - Briquetting Tanks/Elevator/Screen and 2 Bagging Machines; the tanks/elevator/screen and two bagging machines are equipped with a National Air Systems Model RJ-TB-384-206-10 baghouse to control particulate emissions.

008 - One Bagging Machine; equipped with a Mikro-Pulsaire 1F-4/70-H-2761 baghouse to control particulate emissions.

004 - Briquetting Press Room and Dryer equipped with aluminum mesh filters to control particulate emissions.

**The following conditions apply to the emissions unit(s) listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A1. Capacity.** The maximum facility production rate is 8400 tons of charcoal per consecutive twelve months.

[Rule 62-210.200, (PTE), F.A.C. and Title V application received May 28, 1997]

**A2. Hours of Operation.** Each unit is allowed to operate 8760 hours per year.

[Rule 62-210.200, (PTE), F.A.C. and Title V application received May 28, 1997]

**A3. Emissions Unit Operating Rate Limitation After Testing.** See specific condition no. A13.

[Rule 62-297.310(2), F.A.C.]

**Emission Limitations and Standards**

**A4.** Regarding emission unit 001, visible emissions shall not exceed 20% opacity except for one two-minute period per hour during which opacity shall not exceed 40%.

[Rule 62-296.406(1), F.A.C.]

**A5.** See facility-wide condition no. 3 on page 3 for the visible emission limitation for the other emission units.

**Excess Emissions**

**A6.** Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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.]



A7. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

A8. In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department 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.]

### **Test Methods and Procedures**

A9. Each emission unit, except emission unit 001, shall demonstrate compliance with its visible emission limit (see facility-wide condition no. 3) in accordance with DEP Method 9 prior to permit expiration date. The test period shall be a minimum of 30 minutes.

[Rules 62-297.401(9)(c), 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

A10. Emission unit 001 must be compliance tested for visible emissions in accordance with DEP Method 9 annually, on or within 60 days prior to March 5. The test shall be conducted for 60 minutes.

[Rules 62-297.401(9)(c); 62-297.310(7)(a)4.a.; and 62-297.310(4)(a)2., F.A.C.]

A11. DEP Method 9. The provisions of EPA Method 9 (40CFR60, Appendix A) are adopted by reference with the following exceptions:

a) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

b) EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**A12.** At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.

[Rule 62-297.310(7)(a)9, F.A.C.]

**A13.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2)& (2) (b), F.A.C.]

### **Monitoring of Operations**

#### **A14. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

### **Recordkeeping and Reporting Requirements**

**A15.** In order to demonstrate compliance with condition no. A1, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

#### **Monthly**

- a) month
- b) consecutive 12 month total of production rate

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

**A16.** Supporting documentation. The log and documents shall be kept at the facility for at least 5 years and made available to the Department. Daily logs shall be completed within 7 business days and the monthly logs shall be completed by the end of the following month.

[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

**A17.** A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

**A18.** Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

[Rules 62-297.310(8), F.A.C.]

**A19.** At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four air permit applications, DEP Form No. 62-210.900(1). [Rule 62-4.090(1), F.A.C.]

## Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

### Abbreviations and Acronyms:

**DRAFT**

°F: Degrees Fahrenheit  
BACT: Best Available Control Technology  
CFR: Code of Federal Regulations  
DEP: State of Florida, Department of Environmental Protection  
DARM: Division of Air Resource Management  
EPA: United States Environmental Protection Agency  
F.A.C.: Florida Administrative Code  
F.S.: Florida Statute  
ISO: International Standards Organization  
LAT: Latitude  
LONG: Longitude  
MMBtu: million British thermal units  
MW: Megawatt  
ORIS: Office of Regulatory Information Systems  
SOA: Specific Operating Agreement  
UTM: Universal Transverse Mercator

### Citations:

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.*

#### Code of Federal Regulations:

*Example: [40 CFR 60.334]*

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

#### Florida Administrative Code (F.A.C.) Rules:

*Example: [Rule 62-213, F.A.C.]*

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Identification Numbers:**

**DRAFT**  
Facility Identification ID Number:

*Example:* Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example:* 1050221-002-AV, or  
1050221-001-AC

*Where:*

AC = Air Construction Permit  
AV = Air Operation Permit (Title V Source)  
105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by permit tracking database  
001 or 002 = 3-digit sequential project number assigned by permit tracking database

*Example:* PSD-FL-185  
PA95-01  
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit  
PA = Power Plant Siting Act Permit  
AC = old Air Construction Permit numbering

**Appendix E-1, List of Exempt Emissions Units and/or Activities.**

Royal Oak Enterprises  
Ocala Charcoal Manufacturing Facility

**Draft Permit No.:** 0830010-003-AV  
**Facility ID No.:** 0830010

---

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C., provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 213.430(6)(b), F.A.C.

The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6).

Brief Description of Emissions Units and/or Activities

- |  |  |
|--|--|
| 1. Plant maintenance and upkeep activities                     | 23. Steam vents & safety relief valves             |
| 2. Front-end loaders   | 24. Steam leaks                                    |
| 3. Dumping of wood waste                                       | 25. Fire suppression systems                       |
| 4. Transportation of wood                                      | 26. Demineralized water tanks & filtration systems |
| 5. Air compressors and pneumatically operated equipment        | 27. Wood working operation with water sprays       |
| 6. Batteries and battery charging station                      |  |
| 7. Sweeping activity   |  |
| 8. Cook starch boiler steam                                    |  |
| 9. diesel fueled trucks  |  |
| 10. Tractor and trailer traffic                                |  |
| 11. Wood grinding  |  |
| 12. Rain birds   |  |
| 13. Propane fueling station & regulators                       |  |
| 14. Mineral spirits and diesel fuel storage tanks              |  |
| 15. Raw materials storage vessels and handling equipment       |  |
| 16. Hydraulic press  |  |
| 17. Lab drying oven  |  |
| 18. Lab fume hood vents & bench-scale lab equipment            |  |
| 19. Quality control/assurance, inspection, sampling activities |  |
| 20. Hydraulic testing equipment                                |  |
| 21. Waste heat boiler  |  |
| 22. Boiler water treatment operations                          |  |

**Appendix H-1, Permit History/ID Number Changes**

Royal Oak Enterprises  
Ocala Charcoal Manufacturing Facility

**DRAFT Permit No.:** 0830010-003-AV  
**Facility ID No.:** 0830010

**Permit History (for tracking purposes):**

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> <sup>1,2</sup>	<u>Revised Date(s)</u>
-001	Retort Carbonizer	AO42-519	7/10/72	7/10/73		
		AO42-2197	2/5/75	1/30/80		
		AO42-33721	10/20/80	10/16/85		
		AO42-112918	4/11/86	4/10/91		4/30/86, 2/11/87, 8/18/87
		AO42-194275	6/20/91	5/25/96		
		0830010-001-AO	6/10/96	5/30/2001		
-006,007	Char House and Mill & Briquetting Tanks, Bagging	AO42-255930	10/27/95	9/30/99		5/16/95
-005,004	Hoppers, Silos, Hammer Mill, Briquette Press Room & Dryer	AC42-189774	4/8/91	4/25/93		12/1/92
		AO42-224671	5/19/93	4/30/98		

**(if applicable) ID Number Changes (for tracking purposes):**

From: Facility ID No.: N/A

To: Facility ID No.: N/A

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
  - 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
- {Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}