Title V Air Operation Permit Renewal
Permit No. 0290004-017-AV

APPLICANT

The applicant for this project is Suwannee Lumber Company LLC. The applicant's responsible official and mailing address are: Mr. Jason Banks, Director of Safety, Health, Environmental, Suwannee Lumber Company LLC, Suwannee Lumber, 40 SW 10th Street, Cross City, Florida 32628.

FACILITY DESCRIPTION

The applicant operates the existing Suwannee Lumber, which is located in Dixie County at 40 SW 10th Street, Cross City, Florida. The facility processes softwood logs (Southern Yellow Pine) into dried and dimensioned lumber. The existing facility consists of three main processes: a sawmill, three direct fired lumber dry kilns and a planer mill. The maximum heat input to each kiln is less than 30 MMBtu per hour. The fuel fired by the kilns is sawdust using propane for start-up. One kiln may also fire wood waste.

The facility process starts with stripping the bark from received whole logs in the debarker area. The removed bark gets conveyed to the Bark Storage area for off-site shipment of product. The debarked logs transfer to the Sawmill, where they are cut into rough dimensional lumber using chipping heads and band saws. The chips and sawdust collected are conveyed to the Green Chip Storage area for sale as product. The handling and transfer of green sawdust/chip/bark for use and sale off-site is not the subject of a specific air regulatory requirement. For this reason, this activity is included in the Insignificant Activities List of this Permit.

After the Sawmill, the lumber is routed to the stacker where the lumber is sorted and temporarily stored before transfer to a drying kiln (EUs 002, 003, and 004). The green lumber is stacked on carts inside of the drying kilns. The drying of the lumber is accomplished by wood-fueled burners in each kiln. The heated air inside each kiln is circulated by fans over the green lumber stacked inside a drying kiln. Gases from the drying kilns (products of the combustion from the kiln burner, HAPs, and moisture) are released through multiple roof vents that open and close at random intervals during a drying cycle. The vents are utilized to control the temperature and moisture content of the air in the kiln. Fugitive emissions escape through kiln doors and other exit points.
The dried lumber exits the kilns and get moved to the Planer Mill, where the lumber is finished by trimming and planing. Shavings from the planer are captured and pneumatically conveyed to a cyclone, where the shaving are then either transferred to the storage silo for use as fuel for the kiln burners or conveyed to a shaving storage silo for sale as product. The finished lumber conveys to a grader where the lumber is separated based on quality. The finished lumber is stacked, packaged, stored and shipped for sale as product.

Facility Potential To Emit (PTE) VOC emissions exceed 250 TPY. Facility PTE methanol (a Hazardous Air Pollutant) emissions exceeds 10 TPY. For these reasons, the facility is a PSD major source and a major source of Hazardous Air Pollutants (HAPs). This facility includes miscellaneous unregulated/insignificant emissions units and/or activities that include one control device that collects particulate emissions from an unregulated sawdust storage silo.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
002	No. 1 Direct Fired Lumber Dry Kiln
003	No. 2 Direct Fired Lumber Dry Kiln
004	No. 3 Direct Fired Lumber Dry Kiln

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on March 1, 2018, this facility **is** a major source of hazardous air pollutants (HAP). The existing facility **is** a prevention of significant deterioration (PSD)

major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart A, NESHAP General Provisions	002, 003, 004
40 CFR 63, Subpart DDDD, NESHAP: Plywood and Composite Wood Products	002, 003, 004
State Rule Citations	
Rule 62-4, F.A.C., Permits	002, 003, 004
Rule 62-204.800, F.A.C., Federal Regulations Adopted by Reference	002, 003, 004
Rule 62-210.200, F.A.C., PTE	002, 003, 004
Rule 62-210.300, F.A.C., Air General Permits	004
Rule 62-210.370, F.A.C., Emissions Computation and Reporting	004
Rule 62-210.700, F.A.C., Excess Emissions	002, 003, 004
Rule 62-213.410, F.A.C., Changes without Permit Revision	004
Rule 62-296.410, F.A.C., Carbonaceous Fuel Burning Equipment	002, 003, 004
Rule 62-297.310, F.A.C., Common Testing Requirements	002, 003, 004

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit Administrative Correction issued **[August 7, 2013]**
Application for a Title V Air Operation Permit Renewal received **[March 1, 2018]**

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 2421 – Sawmills & Planing Mills, General.

North American Industry Classification System (NAICS): 321113 – Sawmills and Planing Mills, General.

HAP: The facility **is** identified as a major source of hazardous air pollutants (HAP).

Title V: The facility **is** a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility **is** a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

PROJECT REVIEW

The changes that were made as part of this renewal included reformatting, replacement of TV-6 with new Appendix TV, the streamlining of EU sections by moving common conditions to the new appendices, and the combining of EU 002 and EU 003 into one section because they have common permit conditions. Two other changes have been made. First, the Florida Rule 62-296.410(2)(a), F.A.C. visible emissions (VE) opacity limits

were changed and are reflected in the current draft/proposed Title V facility permit. Second, the Florida DEP VE test method was vacated. The VE test method is now EPA Method 9.

CONCLUSION

This project renews Title V air operation permit No. 0290004-015-AV, which was effective on October 14, 2013. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.