Georgia Pacific Wood Products LLC
Palatka Chip N Saw
Facility ID No.: 1070030
Putnam County

Title V Air Operation Permit Renewal

Final Permit No.: 1070030-009-AV

Permitting and Compliance Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: (904) 807-3300
Fax: (904) 448-4363

Title V Air Operation Permit Renewal

Final Permit No.: 1070030-009-AV

Table of Contents

Section **Page Number**

Placard Page 1

I. Facility Information .....…. 2 - 3
A. Facility Description.
B. Summary of Emissions Unit ID No(s). and Brief Description(s).
C. Relevant Documents.

II. Facility-wide Conditions .....…. 4 - 6

III. Emissions Unit(s) and Conditions
A. Emissions Unit(s) 001 Two Direct-Fired Lumber Kilns……..7-10

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:
Georgia Pacific Wood Products, LLC.
234 Comfort Road
Palatka, Florida 32177

Final Permit No.: 1070030-009-AV
Facility ID No.: 1070030
SIC No(s).: 24, 2421
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This facility is located east of U.S. Highway 17, at 234 Comfort Road, Palatka, Putnam County. UTM Coordinates: Zone 17, 436.4; N-3284.3; and, Latitude: 29° 41' 20" North and Longitude: 81° 39' 29"West.

This Title V Air Operation Permit Renewal 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 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:

Attachment	Description
Appendix U-1	List of Unregulated Emissions Units and/or Activities
Appendix I-1	List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6	TITLE V CONDITIONS version dated 06/23/06

Effective Date: April 1, 2008
Renewal Application Due Date: August 19, 2012
Expiration Date: April 1, 2013

Christopher L. Kirts, P.E.
District Air Program Administrator

MCL: mcl

Section I. Facility Information

Subsection A. Facility Description.

This facility consists of two direct-fired lumber kilns and three cyclones for removing wood waste from the wood working operations. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Direct-Fired Lumber Kilns. These two units each consist of a carbonaceous (wood waste) burner with a maximum design heat input of 26 MMBtu per hour. USNR manufactures the East direct-fired kiln burner and the West direct-fired kiln burner is by Energy Systems. Irvington Moore manufactures the kilns. Each kiln is used to dry green lumber. The emissions from each dry kiln are released through 12 vents. There is an abort stack to bypass the kiln to vent the heat between kiln charges.

The maximum throughput rate for each kiln is 135 thousand board feet (mbf) per batch. The average time for each batch may range from 18 to 22 hours or longer depending on the wood conditions and the size of lumber being dried. The maximum throughput rate for both kilns combined is approximately 119,000 mbf per year.

Fuel Silo Cyclone. Sawdust from the chip screening process is conveyed to the fuel silo cyclone.

Planer Mill Cyclone. Rough cut lumber is processed through the planer mill. The shavings from the planer are pneumatically conveyed to the planer mill cyclone. Shavings from the planer trim hog can also be pneumatically conveyed to the planer mill cyclone.

Chip Bin Cyclone. Wood chips from the north and south chipper cyclones are mechanically conveyed through a shaker conveyor and screens. These chips are pneumatically conveyed to the chip bin cyclone.

Based on the Title V Air Operation Permit Revision Application received November 15, 2007,

- The facility is a Title V source.
- The facility is 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.	Description
001	Two Direct-Fired Kilns

Unregulated Emissions Units and/or Activities:

Refer to Appendix U-1, List of Unregulated Emissions Units and/or Activities.

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, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1: Permit History
Statement of Basis

These documents are on file with the permitting authority:
Application for Title V Air Operation Permit Renewal received November 15, 2007.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall 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 Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Open Burning Prohibition. Open burning is prohibited, except when determined by the Department to be the only feasible method of operation and authorized by this permit or an emergency exists which requires immediate action to protect human health and safety.
[Rule 62-296.320(3)(a)&(b), F.A.C.]

5. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

6. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

7. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant 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.]

8. 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.

The following requirement is "not federally enforceable":

a) The permittee shall keep containers of paint solvents and thinners closed and stored in weather-tight buildings.

[Rule 62-296.320(1)(a), F.A.C.; and, Final Title V Permit No. 1070030-001-AV]

9. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

The following requirement is "not federally enforceable":

a) Routine sweeping throughout the facility and keeping work areas free of debris build up.

[Rule 62-296.320(4)(c)2, F.A.C.; and , Title V permit application received June 14, 1996]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision}

10. 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.]

11. 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.]

12. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
[Rule 62-210.700(5), F.A.C.]

13. When appropriate, any recording, 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.]

14. When appropriate, any recording, 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.]

15. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

16. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's North East District Office.

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256
Telephone: 904/807-3300, Fax: 904/448-4363

17. 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
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

18. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-001	Two Direct-Fired Lumber Kilns

The kilns use the heat from the carbonaceous (wood waste) burners to dry green lumber. The maximum design heat input of each burner is 26 MMBtu per hour. The primary fuel for the kilns is green sawdust. The sawdust is fed to each kiln through an auger feed system. On-spec used oil may be fired in the kiln.

The unit is an affected source of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. However, both kilns are not required to comply with any compliance/operating requirement, and the work practice standards, except for the initial notification as required in 40 CFR 63.9(b).

The unit is subject to the following regulations:

- Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment

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

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Permitted Capacity. The maximum heat input rate of each burner is 26 MMBtu per hour.
[Rules 62-4.160(2) and 62-210.200, (PTE), F.A.C.; and Permit No. 1070030-002-AC]

A.2. Maximum Throughput Rate. The maximum throughput rate for each kiln is 135 thousand board feet (mbf) per batch. The maximum throughput rate for both kilns combined is approximately 119,000 mbf per year.
[Rules 62-4.160(2) and 62-210.200, (PTE), and Permit No.1070030-006-AC]

A.3. Methods of Operation (Fuels). Green sawdust shall be the primary fuel fired in the kilns. On-Specification Used Oil that meets the requirements of **Specific Condition A.6 and A.7** may be fired in the kiln at anytime. The on-spec fuel usage shall not exceed approximately 10 gallons per week and the amount fired shall be recorded.
[Permit No.1070030-002-AC]

A.4. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200, (PTE), F.A.C.]

EMISSION LIMITATIONS AND OPERATING STANDARDS

{Permitting Note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed Ringelmann Number 1 (20 percent opacity) except that a density of Ringelmann Number 2 (40 percent opacity) is permissible for not more than two minutes in any one hour.
[Rule 62-296.410(2)(a), F.A.C.]

A.6. On-Specification Used Oil. The on-specification used oil fired, prior to blending, shall comply with the specifications stated below and the provisions of 40 CFR 279 and 761:

On-Spec Used Oil Specifications	
Pollutant	**Allowable Level**
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100°F minimum
PCBs	See Specific Condition No. A.7.

A.7. On-specification used oil may be fired as follows:

- At any time provided the maximum concentration of PCBs shall be less than 2 ppm, whether generated on or off-site. The analysis and recordkeeping requirements apply to each amount prior to blending.
- Only during normal operation temperature and not during startup or shutdown if the maximum concentration of PCBs is ≥ 2 but < 50 ppm.

Approved EPA, DEP or ASTM test methods shall be used or a certified on-specification used oil analysis of each delivery shall be retained for inspection or submittal on request by the Department. [Permit No.1070030-002-AC]

TEST METHODS AND PROCEDURES

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.8. General Compliance Test Requirements: The owner or operator shall comply with the all the applicable general compliance test requirements as described in Rule 62-297, F.A.C.
[Rule 62-297.100 and 62-296.410(3)(c), F.A.C.]

A.9. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.
[Rules 62-296.410(3)(a), F.A.C.]

A.10. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. 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.

2. 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:

a. 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.
b. 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 appropriate 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.

[Rules 62-297.310, F.A.C.]

A.11. VE Compliance Test Frequency: The owner or operator shall conduct test to demonstrate compliance with the VE limit at least once during each federal fiscal year (October 1-September 30).
[Rule 62-297.310(7) (a) 4, F.A.C.]

A.12. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. If it is impracticable 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rules 62-297.310(2), F.A.C.]

A.13. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7) (b), F.A.C.]

NOTIFICATION, REPORTING AND RECORDKEEPING

A.14. Compliance Test Notification. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7) (a) 9, F.A.C.]

A.15. Malfunction Notification. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the NED Air Program immediately 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.]

A.16. Plant Operation – Problems: If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its 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 Department rules.
[Rule 62-4.130, F.A.C.]

A.17. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8), F.A.C.]

A.18. Recordkeeping. The owner or operator shall keep the following record onsite for at least 3 years.

a. The test report.
b. The on-specification used oil usage in gallons per week.
c. The fuel analysis for each batch of on-specification used oil.
d. The monthly throughput rate in thousand board feet (mbf), and the throughput rate for 12 consecutive months.

[Rule 62-4.070, F.A.C. and Permit No.1070030-002-AC]