



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Mathews
Interim Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Sabine Merkle
Klausner Holding USA Inc.
1297 Professional Drive, Suite 202
Myrtle Beach, South Carolina 29577

Re: Initial Title V Air Operation Permit
Proposed Permit No. 1210468-002-AV
Suwannee Mill

Dear Ms. Merkle:

One copy of the proposed permit determination for the initial Title V air operation permit for the Suwannee Mill located in Suwannee County at 17152 46th Trace, Live Oak, Florida, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review.

Interested persons may view the proposed permit by visiting the following website:

<https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact David Lyle Read, P.E., at 850/717-9075.

Executed in Tallahassee, Florida.

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr

Copies sent by electronic mail to the following:

Sabine Merkle, Klausner (Sabine.Merkle@klausner-group.com)
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NOTICE OF PROPOSED PERMIT

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.

PROPOSED PERMIT DETERMINATION

Permit No. 1210468-002-YYY -AV

I. Public Notice.

An Intent to Issue Air Permit issued to Klausner Holding USA Inc. for the Suwannee Mill located in Suwannee County at 17152 46th Trace, Live Oak, Florida, was clerked on January 20, 2017. The Public Notice of Intent to Issue Air Permit was published in Suwannee Democrat on February 8, 2017. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on February 10, 2017.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are **highlighted** in yellow with additions in **double underline** text and deletions in **strikethrough** text.

Email from Michael Ballenger dated February 21, 2017.

Comment 1. Please correct the emission units (EU) description table in Section I.B (page 2 of 25) to reflect that for EU 009 (Sorter Line and Trimmers) one dry sorter line, one planer line and one trimmer line in the sorter are not yet constructed. In addition, please move the green lumber sorting line to EU 011 and indicate that it has not yet been constructed. Finally, for EU 008 (Two Planer Mill Lines with Two Dry Shaving Silos, please indicate that one of the silos have yet to be constructed.

Response 1. The Department agrees with the comment and the emission unit description table is changed as follows:

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001 and 002	Two Biomass Boilers (not yet constructed)
003 - 006	Four Natural Gas Boilers (two boilers not yet constructed)
007	Four Blocks of Drying Kilns (two blocks not yet constructed)
008	Two Planer Mill Lines with Two Dry Shaving Silos (one line <u>and one silo</u> not yet constructed)
009	Sorter Line and Trimmers (green lumber <u>one dry</u> sorting line, <u>one planer line</u> and <u>one trimming line in the sorter line</u> not yet constructed)
010	Biomass Boiler Fly Ash Silo (not yet constructed)
011	Log Storage, Processing, and Sawmills (one sawmill line <u>and one green lumber sorting line</u> not yet constructed)
012	Five Emergency Generators (four generators not yet constructed)
<i>Unregulated Emissions Units and Activities</i>	
013	Miscellaneous Storage Tanks

Comment 2. In Section III.B (page 9 of 25), Specific Condition B.4 "Permitted Capacity", please change "maximum allowable heat input rate" to "design heat input rate" to accurately reflect the language in the original air construction permit (No. 1210468-001-AC, PSD-FL-417).

Response 2. This change will be made to reflect the language of the original air construction permit as follows:

B.4. Permitted Capacity. The **maximum allowable design** heat input rate is as follows:

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<u>Unit No.</u>	<u>MMBtu/hr</u>	<u>Fuel Type</u>
003	46	Natural Gas Only
004	46	Natural Gas Only
005	46	Natural Gas Only (not yet constructed)
006	46	Natural Gas Only (not yet constructed)

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit No. 1210468-001-AC (PSD-FL-417)]

Comment 3. Please replace the old version of the Boiler Startup, Shutdown, and Maintenance Procedures with the newer version.

Response 3. The Appendix Boiler, Startup, Shutdown and Maintenance Procedures was replaced with the newer version.

Comment 4. Please remove the incorrect references in Section III.H (page 25 of 25), Specific Condition H.1 pertaining to NSPS Subpart Kb. Also, please add a permitting note that once the tanks are designed and constructed they will be removed from Section II.H and placed in Appendix I dealing with insignificant activities.

Response 4. These tanks are not subject to NSPS Subpart Kb and consequently the references will be removed as shown below. Also, the permitting note shown below will be added to the section.

Equipment

H.1. Storage tanks:

- The permittee is authorized to operate and maintain 16,000 gallon or less Diesel Storage Tank with a fixed roof to minimize VOC emissions ~~as per 40 CFR 60.110b(a)(2).~~
- The permittee is authorized to operate and maintain two 10,000 gallon or less Diesel Storage Tanks, each with a fixed roof to minimize VOC emissions ~~as per 40 CFR 60.110b(a)(2).~~
- The permittee is authorized to operate and maintain three 265 gallon or less Diesel Storage Tanks with a fixed roof to minimize VOC emissions ~~as per 40 CFR 60.110b(a)(2).~~
- The permittee is authorized to operate and maintain 10,000 gallon or less of reductant storage ~~in accordance with 40 CFR 60.130.~~ The storage of reductant that is used for NOx control in the SNCR system, shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68.
- The permittee is authorized to operate and maintain a 26,400 gallon or less mold/stain protection storage tank to preserve the finished lumber.

[Permit No. 1210468-001-AC]

(Permitting Note: Once design and construction of the tanks are finalized, the tanks shall be moved from Section III.H and placed in Appendix I for insignificant activities.)

Comment 5. Please update the Best Management Practices in Appendix BMP, Best Management Practices to reflect recent changes.

Response 3. Appendix BMP, Best Management Practices was updated to reflect the changes.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit.

The permitting authority will issue the proposed permit No. 01210468-002-AV, with the changes noted above.