

**Gilman Building Products  
Lake Butler Mill  
Facility ID No.: 1250005-007-AV  
Union County**

**Title V Air Operation Permit Renewal**

**DRAFT Permit Project No.: 1250005-007-AV**

Permitting Authority & Compliance Authority:

Department of Environmental Protection

Northeast District Air Program

7825 Baymeadows Way, Suite B-200

Jacksonville, Florida 32256-7590

Telephone: 904/807-3300

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**Title V Air Operation Permit Renewal**

**DRAFT Permit No.: 1250005-007-AV**

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# Florida Department of Environmental Protection

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DRAFT Permit No.: 1250005-007-AV  
Facility ID No.: 1250005  
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 existing facility is located South of SR 100, SE of Lake Butler, Union County, Florida; UTM Coordinates: Zone 17, 373.5 km East and 3319.7 km North; Latitude: 30° 00' 13" North and Longitude: 82° 18' 42" 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:**

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

Effective Date: [ARMS Day 55]  
Renewal Application Due Date:[Month day, year]  
Expiration Date: [Month day, year]

**DRAFT**

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

CLK: lm

## **Section I. Facility Information.**

### **Subsection A. Facility Description.**

This facility consists of several pieces of equipment used to process wood into chips and lumber. Equipment includes: a log debarker, saw, chipper, sorter, planer, cyclones, drying kilns, and a hammermill.

Southern pine logs are debarked, sawed and then dried in the kilns. The dried lumber is then planed, trimmed, and graded prior to shipment.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received December 13, 2007 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**

003	No. 2 Direct-Fired Kiln with roof vents and waste wood fired burner (has an abort stack for heat release when it is not needed in the kiln) that exhaust directly into the kiln.
005	No. 3 Direct-Fired Kiln with roof vents and waste wood fired burner (has an abort stack for heat release when it is not needed in the kiln) that exhaust directly into the kiln.
006	No. 1 Direct-Fired Kiln with roof vents and waste wood fired burner (has an abort stack for heat release when it is not needed in the kiln) that exhaust directly into the kiln.

### **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/ID Number Changes

Statement of Basis

*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 continued:.**

These documents are on file with the permitting authority:

Application for a Title V Air Operation Permit Renewal received December 13, 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. 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]

5. 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.]

**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.

**“Nothing was deemed necessary and ordered at this time.”**

[Rule 62-296.320(1)(a), F.A.C.; and, renewal Title V permit application received December 13, 2007.]

**7. 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):

1. Paved areas
2. Operational measures to reduce dust
3. Limiting vehicles access
4. As needed usage of dust suppressants

[Rule 62-296.320(4)(c)2., F.A.C.; FINAL by applicant in the initial Title V permit application additional information received 07-14-97]

**8. 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.]

**9. 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)}

**10. The permittee shall submit all compliance related notifications and reports required of this permit to the Northeast District Office:**

Florida Department of Environmental Protection  
Northeast District Office, Air Section  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590  
Telephone: 904/448-4300  
Fax: 904/448-4363

**11.** 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

**12.** 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 unit(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
003	No. 2 Direct-Fired Kiln
005	No. 3 Direct-Fired Kiln
006	No. 1 Direct-Fired Kiln

Three (3) Direct-Fired Lumber drying Kilns, each having its waste wood fired burner that provides steam to the kiln and has an abort stack for heat release when necessary, are fueled by dried wood waste exhaust through its roof vents.

These emissions unit(s) are regulated under: Rule 62-296.410(2)(a), F.A.C.

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

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

**A.1.** The [process/operation rate] shall not exceed 25 MMBTU/HR.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**A.2. Methods of Operation** -Waste wood shall be the only fuel fired in these emission units.  
[Rule 62-213.410, F.A.C.]

**A.3. Hours of Operation.** The hours of operation for this emissions unit shall not exceed 8760 hours/year.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

##### **Emission Limitations and 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.}

{Permitting Note: Unless otherwise specified, the averaging time(s) for Specific Condition(s) A.4. is based on the specified averaging time of the applicable test method.}

**A.4.** Visible Emissions shall not exceed 20% opacity except for 40% for 2 mins/hr from each vent.  
[Rule 62-296.410(2)(a), F.A.C.]

### **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.5. Visible Emissions.** The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.  
[Rule 62-296. 410(3)(a), F.A.C.]

**A.6. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required. (a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

9. 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.

**A.6. continued:**

(b) 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 may 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), F.A.C.; and, SIP approved]

**A.7. 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 maximum 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.

(b) All Other Sources. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

[Rules 62-297.310(2) and 62-297.310(2)(b), F.A.C.]

**A.8. Applicable Test Procedures.**

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

**A.8. continued:**

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

[Rule 62-297.310(4)(a)2., F.A.C.]

**A.9. 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.]

**A.10. 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.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

**A.10. continued:**

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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