

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 1210468-011-AV

APPLICANT

The applicant for this project is Binderholz Live Oak, LLC. The applicant's responsible official and mailing address are: Daniel Dorfer, Plant Manager, Binderholz Live Oak, LLC, Suwannee Mill, 17152 46th Trace, Live Oak, Florida, 32060.

FACILITY DESCRIPTION

The applicant operates the existing Suwannee Mill, which is located in Suwannee County at 17152 46th Trace, Live Oak, Florida.

Facility operations include log handling, debarking, sawing, sorting, heat production, lumber drying, planning, and shipping. The mill processes tree length saw logs received from local sources into multidimensional lumber. The logs are received via trucks or rail, and the lumber produced, as well as saleable by-products, are shipped off-site via trucks or railcars.

The facility consists of two natural gas fired boilers; two blocks of drying kilns with Block 1 consisting of 16 kilns and Block 2 consisting of 12 kilns; one planer line; one dried lumber sorter line including one electric hogger; one two debarkers; one two log bucking/root reducing units; one green log sorter line; one sawmill line; three green lumber sorting lines; and one diesel-fired emergency generator. This lumber production facility is capable of producing up to 326.7 million board feet per year (MMBF/yr).

This facility also includes miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
003	Boiler No. 1
007	Drying Kilns
008	Planer Mill Line with a Dry Shavings Silo
009	Sorter Line and Timmer
011	Log Storage, Processing and a Sawmill
012	Emergency Generator
<u>014</u>	Boiler No. 2

APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on October 1, 2024, 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).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	003, 012, and 014
40 CFR 60, Subpart Dc	003 and 014
40 CFR 60, Subpart IIII	012
40 CFR 63, Subpart A	003, 007, 012, and 014

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40 CFR 63, Subpart DDDD	007
40 CFR 63, Subpart ZZZZ	012
40 CFR 63, Subpart DDDDD	003 and 014
<i>State Rule Citations</i>	
62-4 Permits	003, 007, 011, 012, and 014
62-204 Air Pollution Control – General Provisions	
62-210 Stationary Sources of Air Pollution – General Requirements	
62-212 Stationary Sources – Preconstruction Review	
62-213 Operation Permits for Major Sources (Title V) of Air Pollution	
62-296 Stationary Sources – Emission Standards	
62-297 Stationary Sources – Emissions Monitoring	

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit to incorporate Permit No. 1210468-009-AC. The replacement of the heat exchanger associated with Boiler Nos. 1 and 2 authorized by permit No. 1210468-009-AC has not been constructed at the time of application and is not being incorporated into the Title V air operation permit with this project.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received **October 1, 2024**

Additional Information Request dated **November 14, 2024**

Additional Information Response received **January 6, 2025**

Additional Information Response/revisions to application information received **January 21, 2025**

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 2421 – Lumber & Wood Products, Except Furniture

North American Industry Classification System (NAICS): 321113 – Sawmills

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.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike-through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document.

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1. Subsection A is revised to reflect only the applicable requirements for EU 003 Boiler No. 1.

Description: ~~Two One~~ natural gas boilers ~~are is~~ used to generate the hot water that is used in the lumber kiln drying process. ~~The two Boiler No. 1~~ boilers share ~~a common stack with Boiler No. 2 (EU 014).~~

Fuels: The boilers ~~are is~~ fueled solely by natural gas.

Capacity: The design heat input capacity of ~~each the~~ natural gas fired boiler is 46 MMBtu/hour.

Controls: Efficient combustion of natural gas and Good Combustion Practices (GCP) ~~will be is~~ used to minimize the emissions of ~~particulate matter (PM), nitrogen oxides (NO_x), carbon monoxide (CO),~~ VOC, opacity and HAP. Low NO_x burners and flue gas recirculation (FGR) further minimize NO_x emissions.

Stack Parameters: Flue gas from ~~the natural gas boilers~~ Boiler No. 1 and Boiler No. 2 discharge to the atmosphere through a single stack with a design height of 100 feet and a design diameter of 3.61 feet. The flue gas exit temperature is approximately 401°F with a design volumetric flow rate of 30,200 acfm.

EU 003 Initial startup date: April 1, 2012. March 26, 2021 is the most recent startup date after prolonged shutdown since April 2019.

~~EU 004 is a Clayton Industries E-1104 boiler. Initial startup date at the current location: March 1, 2022.~~

CEMS/COMS: None.

{Permitting Note: This unit is subject to NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to steam generating units with a maximum heat input capacity of 100 MMBtu/hr. or less, but greater than or equal to 10 MMBtu/hr.; 40 CFR 60, Subpart A, NSPS General Provisions; 40 CFR 63, Subpart A, NESHAP General Provisions, 40 CFR 63, Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Rules 62-204.800(8)(b)4, 62-204.800(11)(b)86, 62-212.400 (BACT), and 62-296.406, F.A.C.}

NSPS Applicability

A.1. NSPS Subpart Dc. The natural gas boilers ~~must shall~~ meet all applicable requirements of NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units. Subpart Dc is contained in Appendix 40 CFR 60 Subpart Dc, NSPS Small Industrial-Commercial-Institutional Steam Generating Units of this permit. For the natural gas boilers ~~s~~ at the Suwannee mill, records ~~must shall~~ be kept and maintained of the amount of natural gas combusted during each calendar month. [Rule 62-204.800(8)(b)4, F.A.C.; 40 CFR 60, NSPS Subpart Dc; Permit No. 1210468-001-AC (PSD-FL-417)]

NESHAP Applicability

A.2. NESHAP Subpart DDDDD. The natural gas boilers ~~s are is~~ subject to NESHAP Subpart DDDDD in 40 CFR 63 for Industrial, Commercial, and Institutional Boilers and Process Heaters for major sources of HAP. Subpart DDDDD is contained in Appendix 40 CFR 63 Subpart DDDDD, NESHAP Industrial, Commercial, and Institutional Boilers and Process Heaters of this permit. The requirements from Subpart DDDDD for ~~these this~~ Gas 1 units ~~s~~ is to conduct a tune-up of ~~each the~~ boiler annually as specified in **Specific Condition A.17.** (40 CFR 63.7540 and Table 3). [Rule 62-204.800(11)(b), F.A.C.; NESHAP 40 CFR 63, Subpart DDDDD; Permit No. 1210468-001-AC (PSD-FL-417)]

A.3. Work Practice Standards. Records shall be kept on site documenting the annual tune-up required for ~~each the~~ natural gas fired boiler as a work practice standard by NESHAP 40 CFR 63, Subpart DDDDD. The tune-up of ~~each the~~ boiler shall be conducted as specified in **Specific Condition A.17.** (40 CFR 63.7540). [Rule 62-204.800(11)(b), F.A.C.; Rule 62-212.400(BACT), F.A.C.; and NESHAP Subpart DDDDD, 40 CFR 63; Permit No. 1210468-001-AC (PSD-FL-468)]

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Essential Potential to Emit (PTE) Parameters

A.4. Permitted Capacity. The design heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr</u>	<u>Fuel Type</u>
003	46	Natural Gas Only
004	46	Natural Gas Only

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

A.8. Hours of Operation. The hours of operation of each the natural gas boiler are is not restricted (8,760 hours per year).

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

Control Technology

A.9. Air Pollution Control Equipment. To comply with the emission standards of this permit, the permittee shall operate and maintain the following air pollution control equipment on the natural gas boilers.

- Low NO_x Burners:** The permittee shall operate and maintain low NO_x burners on the boilers to achieve the NO_x standards specified in **Specific Condition A.10.**
- Flue Gas Recirculation (FGR):** The permittee shall operate and maintain a FGR system on the boilers to reduce NO_x emissions in the flue gas exhaust and achieve the NO_x emissions standards specified in **Specific Condition A.10.**

{Permitting Note: Emissions of Sulfur Dioxide (SO₂) will be minimized by the firing natural gas. Natural gas and GCP will be used to control emissions of Particulate Matter (PM), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and visible emissions (VE) to the limits specified in Specific Condition A.10.}

[Rules 62-212.400(BACT), and 62-210.200(PTE), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417), and Permit No. 1210468-006-AC]

A.17. Conduct an Annual Tune-up of the Boilers. The permittee must shall conduct an annual tune-up of the boilers to demonstrate continuous compliance as specified in paragraphs a. through f. of this Specific Condition. The permittee must shall conduct the tune-up while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up.

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

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- f. Maintain on-site and submit, if requested by the Administrator Department, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) f.1.- 3 of this section Specific Condition.
1. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
 2. A description of any corrective actions taken as a part of the tune-up; and
 3. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[Rule 62-204.800(11)(b), F.A.C. and 40 CFR 63.7540(a)(10)(i) – (vi)]

- A.19. Switched Fuels or Made a Physical Change to the Boilers.** If you have the permittee has switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, you must the permittee shall provide notice of the date upon which you the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must shall identify:

- a. The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490 Definitions, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.
- b. The currently applicable subcategory under Subpart DDDDD.
- c. The date upon which the fuel switch or physical change occurred.

[Rule 62-204.800(11)(b), F.A.C. and 40 CFR 63.7545(h)]

2. To reflect the change to Permit No. 1210468-001-AC (PSD-FL-417), Section 3, Subsection B and Permit No. 1210468-007-AC, Specific Condition 3, authorized by Permit No. 1210468-009-AC, Specific Condition A.6. is changed as follows:

- A.6. Authorized Fuels.** The boilers are is authorized to only combust natural gas. Natural gas flow meters shall be installed, operated, and maintained on each the boiler to measure and record the volume of gas burned per hour. Records of the gas combusted shall be maintained on site and available for inspection by the Compliance Authority.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417), Permit No. 1210468-007-AC, Permit No. 1210468-009-AC]

3. To reflect the change to Permit No. 1210468-006-AC, Section 3, Subsection A, authorized by Permit No. 1210468-009-AC, Specific Condition A.7., Specific Condition A.10., Specific Condition A.20., Specific Condition A.23. (renumbered to A.25.), and Specific Condition A.28. (renumbered to A.30.) are changed as follows:

- A.7. Boiler Hot Water Output.** The maximum hot water output for each the natural gas fired boiler is 120,727 gallons per hour (4-hour average).

[Rules 62-210.200(PTE), and 62-212.400(PSD), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417), Permit No. 1210468-006-AC, Permit No. 1210468-009-AC]

Emission Limitations and Standards

- A.10. Emission Limits.** Emissions from the pair of natural gas boilers sharing a common stack at the Suwannee Mill shall not exceed the standards given in the table below. Unless otherwise stated, averaging time is the time of the test method. The heat input rate for emission limit calculations shall be the combined rate for each boiler (Boiler No. 1 and Boiler No. 2) sharing a common stack as measured by the natural gas flow to each boiler during stack testing.

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Pollutant	Emission Limit (lb/MMBtu)	Test Frequency ^a	Basis
NO _x	0.036 lb/MMBtu	(I)	BACT
SO ₂	2 gr of S/100 scf	FM ^b	Reasonable Assurance
	<u>Sulfur dioxide (SO₂) emissions from Boiler No. 1 shall be reduced by the firing of natural gas</u>	<u>---</u>	<u>Rule 62-296.406(3)(BACT), F.A.C</u>
CO	0.039 lb/MMBtu	(I, A)	BACT
PM/PM ₁₀ /PM _{2.5} ^c	2 gr of S/100 scf	FM ^b	BACT
<u>PM</u>	<u>PM emissions from Boiler No. 1 shall be reduced by the firing of natural gas</u>	<u>---</u>	<u>Rule 62-296.406(2)(BACT), F.A.C</u>
VOC	0.003 lb/MMBtu	(I)	BACT
Opacity ^d	10% opacity (6-minute blocks) except for up to 20% opacity for one, 6-minute block per hour ^d	(I, A)	Reasonable Assurance
	<u>20% opacity except for one 6-minute period per one-hour period during which opacity shall not exceed 27%</u>	<u>(A)</u>	<u>62-296.406, F.A.C</u>
Conduct a tune-up of the boiler annually as specified in Specific Condition A.17. (40 CFR 63.7540 and Table 3 of Subpart DDDDD). Units in the Gas 1 subcategory shall conduct this tune-up as a work practice for all regulated emissions under 40 CFR 63 Subpart DDDDD.			N/A
<p>a. Initial (I) and (A) annual stack tests.</p> <p>b. “FM” means fuel monitoring to demonstrate that the sulfur content of the natural gas is 2 grains per hundred standard cubic foot (gr/100 scf) or less. Vendor certification can be used in lieu of FM.</p> <p>c. The fuel sulfur specification and the visible emissions standard represent BACT for PM/PM₁₀/PM_{2.5}. The estimated filterable PM emissions rate is 0.002 lb/MMBtu.</p> <p>d. The opacity limits apply during normal operation of <u>each the</u> boiler. During startups and shutdowns opacity shall not exceed 20% opacity (6-minute blocks) except for one 6-minute block per hour of 27%.</p>			

[Rule 62-212.400(BACT), F.A.C.; 62-296.406, 62-204.800(8)(b)4, and 62-204.800(11)(b)86, F.A.C.; NSPS Subpart Dc, 40 CFR 60; NESHAP Subpart DDDDD, 40 CFR 63; Permit No. 1210468-001-AC (PSD-FL-417), and Permit No. 1210468-006-AC; Permit No. 1210468-009-AC]

Recordkeeping and Reporting Requirements

A.20. Stack Test Reports. In addition to the information required in Rule 62-297.310(10), F.A.C., each stack test report shall also include the following information: hot water flow rate (gal/hour), inlet and outlet water temperature, water pressure, heat input rate (MMBtu/hour), natural gas firing rate in cubic feet per hour, and emission rates (lb/MMBtu).

[Permit Nos. 1210468-001-AC, and 1210468-006-AC 1210468-009-AC]

A.25. Work Practice Standards. Records shall be kept on site documenting the annual tune-up required for each the natural gas fired boiler as a work practice standard by NESHAP 40 CFR 63, Subpart DDDDD. The tune-up of each the boiler shall be conducted as specified in (40 CFR 63.7540(10)) **Specific Condition A.17.**

Maintain on-site and submit to the Compliance Authority within 60 days of completing the tune-up, a report containing the following:

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- a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;
- b. A description of any corrective actions taken as part of the tune-up; and
- c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[Rules 62-204.800(8)(b)4, 62-204.800(11)(b)86, 62-212.400(BACT), F.A.C.; NSPS Subpart Dc, 40 CFR 60; and NESHAP Subpart DDDDD, 40 CFR 63; Permit No. 1210468-001-AC (PSD-FL-417), and Permit No. 1210468-006-AC Permit No. 1210468-009-AC]

- A.31. Fuel Flow Meters.** A fuel flow meter shall be installed on each the natural gas fired boiler to record the volume of natural gas used in each the boiler on an hourly, monthly and 12-month rolling total basis.

[Permit Nos. 1210468-001-AC (PSD-FL-417) and 1210468-006-AC 1210468-009-AC]

4. The facility requests Specific Condition A.24. be revised to reflect only the 40 CFR 63 Subpart DDDDD annual compliance report requirements. Specific Condition A.24. (renumbered to A.26.) is revised as follows:

- A.26. 40 CFR 63 Subpart DDDDD Annual Compliance Report.** ~~These boilers are subject only to a requirement to conduct subsequent annual tune-ups according to 40 CFR 63.7540(a)(10) **Specific Condition A.17.** and not subject to emission limits or Table 4 operating limits, you~~ The permittee ~~may~~ shall submit ~~only~~ an annual compliance report, ~~as applicable,~~ as specified in ~~a. and b. of this Specific Condition,~~ instead of a semi-annual compliance report.

- a. ~~Each subsequent semi-annual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.~~ Annual compliance reports ~~must~~ shall cover the applicable 1-year periods from January 1 to December 31.

- b. ~~Each subsequent semi-annual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.~~ Annual-year compliance reports ~~must~~ shall be postmarked or submitted no later than January 31.

[40 CFR 63.7550(b)(3), (4), Table 9 of Subpart DDDDD; Rule 62-204.800(11)(b)]

5. The facility requests Specific Condition A.25.(4) be removed as the boiler is not a limited use boiler per NESHAP Subpart DDDDD and therefore not required to report the total operating time during the reporting period in accordance to 40 CFR 63.7550(c)(1). 40 CFR 63.7550(c)(1) also requires the submitted compliance report to include the information in paragraph 40 CFR 63.7550(c)(5)(xvii), which was not previously included in the Specific Condition. Specific Condition A.25. (renumbered to A.27.) is revised as follows:

- A.27. 40 CFR 63 Subpart DDDDD - Compliance Reports.** The compliance report ~~must~~ shall contain the following information:

- (1) Company and Facility name and address.
- (2) Process unit information, emissions limitations, and operating parameter limitations.
- (3) Date of report and beginning and ending dates of the reporting period.
- ~~(4) The total operating time during the reporting period.~~
- (5) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to (40 CFR 63.7540(a)(10)) **Specific Condition A.17.** Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.

- (6) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report

[40 CFR 63.7550(c)(1), (c)(5)(i)-(iii), (xiv) and (xvii); and Rule 62-204.800(11)(b), F.A.C.]

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6. The facility requests EPA Method 10 to measure CO emissions from EU003 and EU 014 instead of EPA Method 10B stated in Specific Condition A.13.

The Department approved the alternate EPA Method 10 in lieu of EPA Method 10B in alternate sampling procedure, Project 24-M-AP, on August 30, 2024. Based on this approval, Specific Condition A.13. is revised as follows. Project 24-M-AP is also added to the Appendices. It is noted that EU 014 (Boiler No. 2) is not subject to a CO limitation based on the modifications authorized by Permit No. 1210468-009-AC.

Test Methods and Procedures

- A.13. Test Methods.** When required, tests shall be performed in accordance with the following reference methods:

EPA Method	Description of Method and Comments
1 - 4	Determination of Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content {Notes: Methods shall be performed as necessary to support other methods.}
7E	Measurement of NO _x Emissions (Instrumental)
9	Visual Determination of the Opacity
10B 10	Measurement of CO Emissions (Instrumental) Determination of Carbon Monoxide Emissions from Stationary Sources (Instrumental Analyzer Procedure) {Note: The method shall be based on a continuous sampling train.}
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) {Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the THC emissions measured by Method 25A.}
19	Calculation Method for NO _x , PM, and SO ₂ Emission Rates
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Measurement of Gaseous Organic Concentrations (Flame Ionization)

The test methods are specified in Appendix A-1, A-2, A-3, A-4, A-6, and A-7 of 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Compliance Authority.

[Rule 62-204.800, F.A.C. and 40 CFR 60, Appendix A, **Project No. 24-M-AP**]

7. The facility requests that all revisions made via Permit No. 1210468-009-AC to permit conditions related to EU003 and EU 014 hot water output/recordkeeping be incorporated into the facility's Title V permit. Specifically Specific Conditions A.7., A.20., A.28. The facility also requests that Specific Condition A.27. be removed as this condition requires monitoring and recording devices to be maintained for hot water flow rate, inlet/outlet water temperature, and water pressure on EU 003 and EU 014. The facility believes that the recordkeeping of these parameters are no longer required. The facility also requests that Appendix Boiler, Hot Water Output (HWO) be removed citing that it is no longer applicable with the modification/removal of the aforementioned conditions.

Permit No. 1210468-009-AC revised the specified permit conditions of Section 3, Subsection A of Permit No. 1210468-006-AC. This Subsection pertained to Emission Unit 004. Specific Conditions A.7., A.20., A.27. (renumbered to A.30.), A.28. (renumbered to A.31.) and Appendix Boiler, Hot Water Output (HWO) remain applicable to EU 003. Specific Condition A.27. (renumbered to A.29.) is not removed as requested. The revisions to Specific Conditions A.7., A.20., and A.28 (renumbered to A.31.) reflecting the changes authorized by Permit No. 1210468-009-AC are described in Item No. 3 above. There is no change made to the language in Specific Condition A.27. (renumbered to A.30.), however the PSD Permit number is added to Permit No. 1210468-001-AC in the Specific Condition citation:

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Other Monitoring Requirements

A.30. Hot Water Parameters. In accordance with the manufacturer's recommendations, the permittee shall calibrate, operate, and maintain continuous monitoring and recording devices for the following parameters: hot water flow rate, inlet water temperature (°F), outlet water temperature, and water pressure (psig). Records shall be maintained on site and made available upon request. Appendix Boiler Hot Water Output contains this information.

[Rule 62-212.400(5), F.A.C., and Permit No. 1210468-001-AC (PSD-FL-417)]

8. To reflect the Actual Emissions Reporting required by Permit No. 1210468-009-AC, Specific Condition A.29. is added to Subsection A for EU 003- Boiler No. 1 as follows:

A.29. Actual Emissions Reporting. Permit No. 1210468-009-AC is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for volatile organic compounds (VOC), particulate matter (PM), PM with a mean diameter of less than 10 microns (PM₁₀), and PM with a mean diameter of less than 2.5 microns PM_{2.5}. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
- b. The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - (1) The name, address and telephone number of the owner or operator of the major stationary source;
 - (2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - (4) Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual VOC, PM, PM₁₀, and PM_{2.5} emissions for Emission Units 003, 014, 007, 008, 009, 011:
 - (1) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of VOC, PM, PM₁₀, and PM_{2.5} as used in the application to establish baseline emissions.
 - (2) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 1210468-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

[Permitting Note: Baseline actual emissions of VOC were determined to be 253.7 tons, of PM were determined to be 15.6 tons, of PM10 were determined to be 7.3 tons and of PM2.5 were determined to be 4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 2.42 tons, of PM10 were determined to be 1.29 tons and of PM2.5 were determined to be 0.97 tons.]

STATEMENT OF BASIS

9. To reflect the change to Permit No. 1210468-006-AC, Section 3, Subsection A, authorized by Permit No. 1210468-009-AC, Subsection F is added to the draft Title V permit for EU 014.

The specific conditions in this section apply to the following emissions unit:

<u>EU No.</u>	<u>Brief Description</u>
<u>014</u>	<u>Boiler No. 2</u>

Description: One natural gas boiler is used to generate the hot water that is used in the lumber kiln drying process. Boiler No. 2 shares a common stack with Boiler No. 1.

Fuels: The boiler is fueled solely by natural gas.

Capacity: The design heat input capacity of the natural gas fired boiler is 46 MMBtu/hour.

Controls: Efficient combustion of natural gas and Good Combustion Practices (GCP) is used to minimize the emissions of PM, NO_x, CO, VOC, opacity and HAP. Low NO_x burners and flue gas recirculation (FGR) further minimize NO_x emissions.

Stack Parameters: Flue gas from Boiler No. 1 and Boiler No. 2 discharge to the atmosphere through a single stack with a design height of 100 feet and a design diameter of 3.61 feet. The flue gas exit temperature is approximately 401 °F with a design volumetric flow rate of 30,200 acfm.

EU 004 is a Clayton Industries E-1104 boiler. Initial startup date at the current location: March 1, 2022.

CEMS/COMS: None.

{Permitting Note: This unit is subject to NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to steam generating units with a maximum heat input capacity of 100 MMBtu/hr. or less, but greater than or equal to 10 MMBtu/hr.; 40 CFR 60, Subpart A, NSPS General Provisions; 40 CFR 63, Subpart A, NESHAP General Provisions, 40 CFR 63, Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Rules 62-204.800(8)(b)4, 62-204.800(11)(b)86, and 62-296.406, F.A.C.}

NSPS Applicability

F.1. NSPS Subpart Dc. The natural gas boiler shall meet all applicable requirements of NSPS Subpart Dc in 40 CFR 60 for Small Industrial-Commercial-Institutional Steam Generating Units. Subpart Dc is contained in Appendix 40 CFR 60 Subpart Dc, NSPS Small Industrial-Commercial-Institutional Steam Generating Units of this permit. For the natural gas boiler at the Suwannee mill, records shall be kept and maintained of the amount of natural gas combusted during each calendar month.
[Rule 62-204.800(8)(b)4, F.A.C.; 40 CFR 60, NSPS Subpart Dc; Permit No. 1210468-009-AC]

NESHAP Applicability

F.2. NESHAP Subpart DDDDD. The natural gas boiler is subject to NESHAP Subpart DDDDD in 40 CFR 63 for Industrial, Commercial, and Institutional Boilers and Process Heaters for major sources of HAP. Subpart DDDDD is contained in Appendix 40 CFR 63 Subpart DDDDD, NESHAP Industrial, Commercial, and Institutional Boilers and Process Heaters of this permit. The requirements from Subpart DDDDD for this Gas 1 unit is to conduct a tune-up of the boiler annually as specified in **Specific Condition F.15**. (40 CFR 63.7540 and Table 3).
[Rule 62-204.800(11)(b), F.A.C.; NESHAP 40 CFR 63, Subpart DDDDD; Permit No. 1210468-009-AC]

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F.3. Work Practice Standards. Records shall be kept on site documenting the annual tune-up required for the natural gas fired boiler as a work practice standard by NESHAP 40 CFR 63, Subpart DDDDD. The tune-up of each boiler shall be conducted as specified in **Specific Condition F.15**. (40 CFR 63.7540). [Rule 62-204.800(11)(b), F.A.C.; NESHAP 40 CFR 63 Subpart DDDDD; Permit No. 1210468-009-AC]

Essential Potential to Emit (PTE) Parameters

F.4. Permitted Capacity. The design heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr</u>	<u>Fuel Type</u>
<u>014</u>	<u>46</u>	<u>Natural Gas Only</u>

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit No. 120468-006-AC, Permit No. 1210468-009-AC]

F.5. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-Wide Testing Requirements. [Rule 62-297.310(3), F.A.C.]

F.6. Authorized Fuels. The boiler is authorized to combust natural gas only. [Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; Permit No. 1210468-006-AC, Permit No. 1210468-009-AC]

F.7. Hours of Operation. The hours of operation of the natural gas boiler is not restricted (8,760 hours per year). [Rule 62-210.200(PTE), F.A.C.; and, Permit No. 1210468-006-AC]

Control Technology

F.8. Air Pollution Control Equipment. The permittee shall operate and maintain the low NOx burners and Flue Gas Recirculation (FGR) to reduce NOx emissions from the natural gas boiler. [Rule 62-210.200(PTE), F.A.C.; Permit No. 1210468-009-AC]

Emission Limitations and Standards

F.9. Emission Limits. Emissions from the natural gas boiler shall not exceed the standards given in the table below. Unless otherwise stated, averaging time is the time of the test method. The heat input rate for emission limit calculations shall be the combined rate for each boiler (Boiler No. 1 and Boiler No. 2) sharing a common stack as measured by the natural gas flow to each boiler during stack testing.

<u>Pollutant</u>	<u>Emission Limit (lb/MMBtu)</u>	<u>Test Frequency ^a</u>	<u>Basis</u>
<u>SO₂</u>	<u>Sulfur dioxide (SO₂) emissions from Boiler No. 2 shall be reduced by the firing of natural gas</u>	<u>---</u>	<u>Rule 62-296.406(3)(BACT), F.A.C</u>
<u>PM</u>	<u>PM emissions from Boiler No. 2 shall be reduced by the firing of natural gas</u>	<u>---</u>	<u>Rule 62-296.406(2)(BACT), F.A.C</u>
<u>Opacity ^b</u>	<u>20% opacity except for one 6-minute period per one-hour period during which opacity shall not exceed 27%</u>	<u>(A)</u>	<u>62-296.406, F.A.C.</u>
<u>Conduct a tune-up of the boiler annually as specified in Specific Condition F.15. (40 CFR 63.7540 and Table 3 of Subpart DDDDD). Units in the Gas 1 subcategory shall conduct this tune-up as a work practice for all regulated emissions under 40 CFR 63 Subpart DDDDD.</u>			<u>N/A</u>
<u>a. (A) annual stack tests.</u>			
<u>b. "The opacity limits apply during normal operation of the boiler. During startups and shutdowns opacity shall not exceed 20% opacity (6-minute blocks) except for one 6-minute block per hour of 27%."</u>			

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[Rules 62-296.406, 62-204.800(8)(b)4, and 62-204.800(11)(b)86, F.A.C.; NSPS Subpart Dc, 40 CFR 60; NESHAP Subpart DDDDD, 40 CFR 63; Permit No. 1210468-009-AC]

Test Methods and Procedures

F.10. Test Methods. When required, tests shall be performed in accordance with the following reference methods:

<u>EPA Method</u>	<u>Description of Method and Comments</u>
<u>9</u>	<u>Visual Determination of the Opacity</u>

The test methods are specified in Appendix A-4 of 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Compliance Authority.

[Rule 62-204.800, F.A.C. and 40 CFR 60, Appendix A]

F.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

(Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldeportal.com/go/home> and sign in (or register if you're a new user) from the link in the upper right corner of the page. On the Welcome page select the Submit option, then select Registration/Notification, and then click on Air Compliance Test Notifications. Once in the process, just carefully read the instructions on each screen (and under the Help tabs) to complete the notification.)

F.12. Annual Compliance Tests Required. During each calendar year (January 1st to December 31st), this emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions specified in **Specific Condition F.9**. An annual VE test shall not be required for any emissions unit that meets the requirements of Rule 62-297.310(8)(a)5., F.A.C. Tests shall be conducted between 90% and 100% of the maximum heat input rate.

[Rules 62-297.310(8)(a)3. and (b), F.A.C.; 40 CFR 60.8]

F.13. Compliance Test Duration. The required minimum period of observation for the VE test shall be 60 minutes for emissions units that are subject to a multiple-valued opacity standard (**Specific Condition F.9**). [Rule 62-297.310(5)(b), F.A.C.]

F.14. Test Requirements. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. [Rule 62-297.310(7)(a)9., F.A.C.]

F.15. Conduct an Annual Tune-up of the Boiler. The permittee shall conduct an annual tune-up of the boiler to demonstrate continuous compliance as specified in **paragraphs a. through f. of this Specific Condition**. The permittee shall conduct the tune-up while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up.

a. **Burner Inspection.** As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment.

b. **Flame Pattern Inspection.** Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

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- c. *Air-to-fuel Ratio Inspection.* Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- d. *Optimize Total Emissions of CO.* Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- e. *CO Concentrations.* Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- f. *Records.* Maintain on-site and submit, if requested by the Department, a report containing the information in **paragraphs f.1. – f.3. of this Specific Condition.**
 - 1. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
 - 2. A description of any corrective actions taken as a part of the tune-up; and
 - 3. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[Rule 62-204.800(11)(b), F.A.C. and 40 CFR 63.7540(a)(10)(i) – (vi)]

Notification

- F.16.** Burning Other Fuels. If the permittee operates a boiler designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to Subpart DDDDD, and the permittee intend to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of part 63, part 60, 61, or 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575 Definitions, the permittee shall submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575 Definitions. The notification shall include the information specified in **a. through e. of this Specific Condition.**
- a. Company name and address.
 - b. Identification of the affected unit.
 - c. Reason you are unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
 - d. Type of alternative fuel that you intend to use.
 - e. Dates when the alternative fuel use is expected to begin and end.

[Rule 62-204.800(11)(b), F.A.C. and 40 CFR 63.7545(f)]

- F.17.** Switched Fuels or Made a Physical Change to the Boiler. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee shall provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification shall identify:
- a. The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490 Definitions, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.
 - b. The currently applicable subcategory under Subpart DDDDD.
 - c. The date upon which the fuel switch or physical change occurred.

[Rule 62-204.800(11)(b), F.A.C. and 40 CFR 63.7545(h)]

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Recordkeeping and Reporting Requirements

F.18. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

F.19. Natural Gas Combustion Records- NSPS Subpart Dc.

a. The permittee shall record and maintain records of the amount of natural gas combusted during each operating day

b. As an alternative to maintaining records of the amount of natural gas combusted during each operating day, the permittee may elect to record and maintain records of the amount of natural gas combusted during each calendar month.

[Rule 62-204.800(8)(b)4, F.A.C.; 40 CFR 60.48c(g)(1) and (2)]

F.20. NSPS Subpart Dc Recordkeeping. The permittee shall comply with the following recordkeeping provisions as an alternative to the requirements in **Specific Condition F.19.a.**:

a. If all steam generating units in the facility (including steam generating units not subject to 40 CFR 60, Subpart Dc) combust natural gas and distillate oil meeting the most current requirements of 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to the facility property during each calendar month.

b. All records required under this **specific condition** shall be maintained by the permittee for a period of 5 years following the date of such records.

[Rule 62-204.800(8)(b)4 & 62-213.440(1)(b)2.b., F.A.C.; and 40 CFR 60.48c(g)(3) & (i)]

*[Permitting Note: Use of the recordkeeping options in 40 CFR 60.48c(g)(3) (see **paragraph b.** and Appendix NSPS, Subpart Dc) is predicated on all steam generating units burning fuel that is compliant with SO₂ standards in NSPS Subpart Dc. The recordkeeping options in 40 CFR 60.48c(g)(3) may also be used if every steam generating unit in the facility is only burning natural gas.]*

F.21. Work Practice Standards. Records shall be kept on site documenting the annual tune-up required for the natural gas fired boiler as a work practice standard by NESHAP 40 CFR 63, Subpart DDDDD. The tune-up of the boiler shall be conducted as specified in (40 CFR 63.7540(a)(10)) **Specific Condition F.15.**

Maintain on-site and submit to the Compliance Authority within 60 days of completing the tune-up, a report containing the following:

a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;

b. A description of any corrective actions taken as part of the tune-up; and

c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[Rules 62-204.800(8)(b) and (11)(b), F.A.C.; NSPS Subpart Dc, 40 CFR 60; and NESHAP Subpart DDDDD, 40 CFR 63; Permit No. 1210468-009-AC]

F.22. 40 CFR 63 Subpart DDDDD Annual Compliance Report. The permittee shall submit an annual compliance report as specified in **this Specific Condition**. Annual compliance reports shall cover the applicable 1-year periods from January 1 to December 31. Annual-year compliance reports must be postmarked or submitted no later than January 31.

[40 CFR 63.7550(b)(3), (4), Table 9 of Subpart DDDDD; Rule 62-204.800(11)(b)]

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- F.23.** 40 CFR 63 Subpart DDDDD - Compliance Reports. The permittee is required to submit an annual compliance report with the following information:
- Company and Facility name and address.
 - Process unit information, emissions limitations, and operating parameter limitations.
 - Date of report and beginning and ending dates of the reporting period.
 - Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to (40 CFR 63.7540(a)(10)) **Specific Condition F.15.** Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.
 - Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- [40 CFR 63.7550(c)(1), (c)(5)(i)-(iii), (xiv) and (xvii); and Rule 62-204.800(11)(b), F.A.C.]
- F.24.** 40 CFR 63 Subpart DDDDD- Report Submission. The permittee shall submit all reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the EPA at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.
- [40 CFR 63.7550(h)(3) and Rule 62-204.800(11)(b), F.A.C.]

10. To reflect the Actual Emissions Reporting required by Permit No. 1210468-009-AC, Specific Condition F.25. is added to Subsection F for EU 014- Boiler No. 2 as follows:

- F.25.** Actual Emissions Reporting. Permit No. 1210468-009-AC is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for volatile organic compounds (VOC), particulate matter (PM), PM with a mean diameter of less than 10 microns (PM₁₀), and PM with a mean diameter of less than 2.5 microns PM_{2.5}. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - The name, address and telephone number of the owner or operator of the major stationary source;
 - The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - Any other information that the owner or operator wishes to include in the report.
 - The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

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d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual VOC, PM, PM₁₀, and PM_{2.5} emissions for Emission Units 003, 014, 007, 008, 009, 011:

1. Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of VOC, PM, PM₁₀, and PM_{2.5} as used in the application to establish baseline emissions.
2. As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 1210468-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

[Permitting Note: Baseline actual emissions of VOC were determined to be 253.7 tons, of PM were determined to be 15.6 tons, of PM₁₀ were determined to be 7.3 tons and of PM_{2.5} were determined to be 4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 2.42 tons, of PM₁₀ were determined to be 1.29 tons and of PM_{2.5} were determined to be 0.97 tons.]

11. To reflect the change to Permit No. 1210468-001-AC (PSD-FL-417), Section 3, Subsection C, authorized by Permit No. 1210468-009-AC, EU 007 emission unit description is revised, and a new Specific Condition B.3., is added as follows with the remaining specific conditions in Subsection B of the draft permit renumbered:

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
007	Two Indirectly-Heated Drying Kiln Blocks

[Permitting Note: Block 1 contains 12 kilns while Block 2 contains 16 kilns.]

This emission unit consists of two indirectly-heated drying kiln blocks that dry the rough-sawn lumber to reduce the moisture content under carefully controlled temperature and relative humidity conditions. There are multiple kilns within each block. Kiln Block 1 has 12 kilns and Block 2 has 16 kilns. The lumber is transferred via mobile equipment from the sawmill building into one of the 28 drying kilns, arranged in separate blocks. During kiln drying, condensate from the green rough sawn lumber is collected in basins and stored in tanks. At the end of the drying process, the kilns are equalized; and condensate is reabsorbed into the dried lumber from the condensate basins.

[Permitting Note: This emission unit is subject to 40 CFR 63, Subpart A, NESHAP General Provisions, 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants Plywood and Composite Wood Products; Rule 62-212.400, F.A.C. and BACT Determination.]

- B.3. Drying Kilns: The lumber kilns shall use hot water to heat the green rough sawn lumber and reduce the moisture content. Typical design parameters for the drying kilns include two exhaust vents to the atmosphere with a total of 56 vents from the 28 drying kilns. The total kiln volume is 250 cubic meters (m³) or 8,830 cubic feet (ft³). Total production capacity is 326.7 MMBF/yr. [Rule 62-210.200(PTE), F.A.C. and Permit No. 1210468-009-AC]

12. The facility noted that in Specific Condition B.5., the expected nominal emission rates of PM, PM₁₀, and PM_{2.5} are stated as 22 lb PM/MBF, 12.8 lb PM₁₀/MBF, and 4.2 lb PM_{2.5}/MBF. However, based on lumber industry standards, these units should be in terms of pounds PM/PM₁₀/PM_{2.5} per million board feet. Therefore, adjusted, the nominal emissions are 0.022 lb PM/MBF, 0.0128 lb PM₁₀/MBF, and 0.042 lb PM_{2.5}/MBF. Based on the comment and Section 4.4 of the technical evaluation for Permit No. 1210468-001-AC (PSD-FL-417) where it is stated that the emission factor of 0.022 lb/1000 bf of total PM (an emission factor originally derived from the NCASI Technical Bulletin No. 845 for steam heated kilns) is considered to be BACT, the permitting note in Specific Condition B.5. (renumbered to Specific Condition B.6) is revised as follows:

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- B.6. PM Emissions.** PM emissions shall be controlled by the kiln enclosure and work practice standards such as low velocity exhaust gas released to the atmosphere from the kiln vents. As a work practice standard, visible emissions from the kiln vents shall not exceed 10% opacity excluding water vapor.
- {Permitting Note: The work practice standards are established as BACT for PM/PM₁₀/PM_{2.5} emissions from drying kilns and are expected to result in the following nominal emissions: 22 0.022 lb PM/MBF, 42.8 0.0128 lb PM₁₀/MBF, and 4.2 0.042 lb PM_{2.5}/MBF for an annual production rate of 326.7 MMBF/yr.}*
- [Rules 62-210.200 (PTE), 62-212.400 (BACT), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]
13. To reflect the Actual Emissions Reporting required by Permit No. 1210468-009-AC, Specific Condition B.13. is added to Subsection B for EU 007- Drying Kilns as follows:

B.13. Actual Emissions Reporting. Permit No. 1210468-009-AC is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for volatile organic compounds (VOC), particulate matter (PM), PM with a mean diameter of less than 10 microns (PM₁₀), and PM with a mean diameter of less than 2.5 microns PM_{2.5}. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

b. The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

- (1) The name, address and telephone number of the owner or operator of the major stationary source;
- (2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
- (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
- (4) Any other information that the owner or operator wishes to include in the report.

c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual VOC, PM, PM₁₀, and PM_{2.5} emissions for Emission Units 003, 014, 007, 008, 009, 011:

- (1) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of VOC, PM, PM₁₀, and PM_{2.5} as used in the application to establish baseline emissions.
- (2) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 1210468-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

{Permitting Note: Baseline actual emissions of VOC were determined to be 253.7 tons, of PM were determined to be 15.6 tons, of PM₁₀ were determined to be 7.3 tons and of PM_{2.5} were determined to be 4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 2.42 tons, of PM₁₀ were determined to be 1.29 tons and of PM_{2.5} were determined to be 0.97 tons.}

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14. To reflect the change to Permit No. 1210468-001-AC (PSD-FL-417), Section 3, Subsection D, authorized by Permit No. 1210468-009-AC, EU 008 and EU 009 emission unit descriptions, Specific Condition C.3. are revised as follows, Specific Condition C.5. is renumbered to Specific Condition C.9. and revised as follows:

Subsection C. The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
008	A Planer Mill Line with a Dry Shaving Silo: The planer line has a vacuum ventilation system that collects and conveys dry wood shavings and sawdust to the dry shavings silo. The dry shavings silo is approximately 56,000 ft³ and has a baghouse.
009	A Sorter Line Trimmer: The sorter line trimmer conveys trimmed blocks and ends by gravity feed to either the hogger in the byproduct screening building or for transport and sale offsite. Dry sawdust from the sorter line trimmer is sent by vacuum duct to the dry shavings silo.

The dried lumber is transported from the drying kilns to the planer mill building, where individual boards are planed and trimmed on the planer line.

The planer line is fitted with trimmers downstream of the planers in the sorter line building. The sorter line building is equipped with an open chain conveyor system to move the final lumber board onto the dried lumber sorter line (which is separate from the green lumber sorter line). The final lumber board is packaged and then transported to a designated storage area.

The planer (EU 008) and the dried lumber sorter line (EU 009) are both located inside a partially enclosed building and are equipped with a pneumatic extraction system to collect dry wood shavings and sawdust.

The planer line has a vacuum ventilation system that collects and conveys dry wood shavings and sawdust to the dry shavings storage silo. The dry shavings storage silo has a storage capacity of approximately 56,000 ft³ and a baghouse. From the storage silo, shavings and sawdust are gravity fed into trucks for shipment off-site.

The sorter line has trimmers for trimming the board length. The trimmer has an open belt conveyor system is used to transfer trimmed blocks and ends from the trimmers by gravity feed to either a hogger (powered by an electric motor) located in in the byproduct screening building or for transport and sale offsite. The ground pieces from the hogger are conveyed to a covered storage area adjacent to the byproduct screening building. Dry sawdust from the sorter line trimmer is sent by vacuum duct to the dry shavings silo.

Stack Parameters: Exhaust gas exits at approximately 72 °F with a volumetric flow rate of 62,625 dscfm through a single dry shavings silo baghouse stack that is approximately 2.62 feet in diameter and 106 feet above ground level.

[Permitting Note: These emission units are regulated under Rule 62-212.400, F.A.C. and BACT Determination.]

Control Technology

- C.3. ~~Air Pollution Control Equipment-Silo Baghouse.~~ To comply with the emission standards of this permit, The permittee shall operate and maintain a baghouse on the dry shaving silo for the planer mill extraction system and sorter line trimmer. Baghouse control units shall be designed to achieve a dust outlet loading of 0.004 grains/dscf.
[Rules 62-212.400(BACT), and 62-4.070(3). F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)
1210468-009-AC (PSD-FL-417A)]

Recordkeeping and Reporting Requirements

- C.9. ~~PM₁₀/PM_{2.5} Specification Baghouse Records.~~ The baghouse control unit shall be designed to achieve a dust outlet loading of 0.004 grains/dscf. Compliance with the design standard in Specific Condition C.3. shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
[Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070. F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417) 1210468-009-AC (PSD-FL-417A)]

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[Rule 62-212.400(5), F.A.C., and Permit No. 1210468-001-AC (PSD-FL-417)]

15. To reflect the Actual Emissions Reporting required by Permit No. 1210468-009-AC, Specific Condition C.10. is added to Subsection C for EU 008 and EU 009- Planer Mill, Sorter and Trimmer as follows:

C.10. Actual Emissions Reporting. Permit No. 1210468-009-AC is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for volatile organic compounds (VOC), particulate matter (PM), PM with a mean diameter of less than 10 microns (PM₁₀), and PM with a mean diameter of less than 2.5 microns PM_{2.5}. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

- The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
- The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - The name, address and telephone number of the owner or operator of the major stationary source;
 - The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - Any other information that the owner or operator wishes to include in the report.
- The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual VOC, PM, PM₁₀, and PM_{2.5} emissions for Emission Units 003, 014, 007, 008, 009, 011:
 - Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of VOC, PM, PM₁₀, and PM_{2.5} as used in the application to establish baseline emissions.
 - As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 1210468-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

[Permitting Note: Baseline actual emissions of VOC were determined to be 253.7 tons, of PM were determined to be 15.6 tons, of PM10 were determined to be 7.3 tons and of PM2.5 were determined to be 4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 2.42 tons, of PM10 were determined to be 1.29 tons and of PM2.5 were determined to be 0.97 tons.]

16. To reflect the change to Permit No. 1210468-001-AC (PSD-FL-417), Section 3, Subsection F, authorized by Permit No. 1210468-009-AC, Specific Condition D.3. (renumbered to D.5) and Specific Condition D.4. (renumbered to Specific Condition D.11.) and the emission unit description are revised, and the emission description is also revised based on Application No. 1210468-011-AV for EU 011 - Log Storage, Processing, and Sawmill as follows:

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Subsection D. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
011	Log Storage, Processing, and Sawmill: This emissions unit comprises the preprocessing of green saw logs into rough cut lumber. Logs are stored, debarked, rough trimmed, sorted and cut into rough sawn dimensional lumber. Wet green byproducts including bark, trimmed roots and ends, chips, and saw dust are stored for transport and sale offsite.

This emissions unit comprises the preprocessing of green saw logs into rough cut lumber. Tree-length green saw logs (Southern yellow pine) are either brought directly to the in-feed of the debarking process or stockpiled after being unloaded from truck or rail cars in the storage area until required for the lumber mill production operation. From stockpiles, logs are fed into the debarking unit. Green logs have moisture content of 50% or greater. The facility may use colored paints, inks, and lacquers to indicate the grade or product designation of the logs.

The facility operates two complete log receipt and debarking lines. Each line is comprised of a saw log root flare-reducing unit, two in-feed tables, and a debarker. A log loader transfers wood from the log storage area to the root flare-reducing unit before the logs are sent to one of the two in-feed tables on the debarking line. The two debarking units operate in parallel and remove the tree bark from the processed logs. The bark is gravity-fed onto a conveyor underneath. Separated bark is transferred to a storage area located outside the log processing building to be sold as a byproduct.

Debarked logs are assessed for quality by cutting and root reducing, as necessary. The cutting and root reducing activities occur inside the log processing building. The debarked logs are conveyed out of the log processing building to be sorted by quality and size into concrete boxes. Sorted, Once segregated into boxes, the debarked logs are then transferred by motored vehicles to intermediate storage stacks prior to being fed into the sawmill.

An intersection of the log loader consists of several buffer decks where the debarked logs from each merchandiser are transferred from the storage area into the sawmill building, where a conveyor system transfers the wood through the saw line. Once the logs are cut into rough-sawn lumber in the sawmill, it is sorted according to quality and length and then trimmed to market specifications.

The sawn lumber trim ends are gravity feed to a conveyance system, which transfers the trim ends to a hogger (powered by an electric motor) located inside the byproduct screening building. The chipped wood from the hogger is transferred into the byproduct screening building to be combined with the chips (wet) from the saw mill.

Chips and sawdust generated from the saw lines feed via gravity onto a separate enclosed conveyance system from the processed wood (lumber). A vibrating belt (screening system) separates the chips and sawdust generated in the sawmill building. Before storage, the Diacon Spray System applies a fungicide on the lumber for mold and stain protection.

An exhaust ventilation extraction system collects sawdust generated from the trimmers of the green lumber sorting line. An extraction system pneumatically conveys the sawdust (wet) to the byproduct screening building. A baghouse is utilized on the pneumatic conveyance system as a particle separation device to remove the sawdust (wet) from the conveyance stream. The baghouse also minimizes emissions of particulate matter from sawdust conveyance.

The wet wood chips are transferred from the byproduct screening building via a conveyor directly into an outdoor storage area. The wet sawdust is transferred to a separate covered storage area adjacent to the byproduct screening building. Wet green byproducts including bark, trimmed roots and ends, chips, and sawdust are stored for transport and sale offsite.

Stack Parameters: Exhaust gas exits at approximately 72 °F with a volumetric flow rate of 30,606 dscfm through a single baghouse stack that is approximately 3.28 feet in diameter and 46 feet above ground level.

[Permitting Note: This emission unit is regulated under Rule 62-212.400, F.A.C., PSD and BACT Determination.]

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Control Technology

- D.5.** ~~Air Pollution Control Equipment-Sawing, Sorting and Trimming Baghouse.~~ The permittee shall operate and maintain a baghouse to control ~~the PM~~ emissions of saw dust from the ~~three four~~ green lumber sorting and trimming lines. Wet sawdust from the green lumber sorting lines ~~are shall be~~ collected by a vacuum system and conveyed through the baghouse to storage to be shipped off site for sale. The baghouse control unit shall be designed to achieve a dust outlet loading of 0.005 grains/dscf. Compliance with the design standard shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
[Rules 62-4.070, 62-210.200 (PTE) and 62-212.400(BACT), F.A.C.; 1210468-001-AC (PSD-FL-417) 1210468-009-AC (PSD-FL-417A)]

Recordkeeping and Reporting Requirements

- D.11.** ~~PM/PM₁₀/PM_{2.5} Specification Baghouse Records.~~ The baghouse control units shall be designed to achieve a dust outlet loading of 0.005 grains/dscf. Compliance with the design standard in Specific Condition D.5 shall be demonstrated by maintaining records of the equipment vendor performance specification sheets.
[Rules 62-210.200 (PTE), 62-212.400(BACT), and 62-4.070, F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417) 1210468-009-AC (PSD-FL-417A)]

17. To reflect the change authorized by Permit No. 1210468-009-AC, new Specific Conditions D.1., D.2. and D.12. have been added to Subsection D for EU 011- Log Storage, Processing, and Sawmill:

Equipment

- D.1.** Log Merchandisers: The permittee operates two log merchandisers in parallel at the mill. Each log merchandiser consists of a log infeed deck, log root flare reducer, green log debarker, cross cutting, with a single common intersection shared by both log merchandisers:
- a. Log Infeed Deck. One of the two log merchandisers log infeed deck consists of two different infeed decks, one for long logs which ranges between 18-50 feet and one for short logs or timber, ranging from 10-16 feet. For both log merchandisers, logs are taken from the storage area as a bundle and placed on the infeed deck of the log processor, where they are scattered and aligned for feeding into the process line. If the logs are too long, they are cut into acceptable length.
 - b. Log Root Flare Reducer. Each log merchandisers consists of one saw log root flare reducing unit that removes roots from the logs before being fed into the debarking unit. The separated roots and saw dust are conveyed by gravity feed to storage for shipment off site for sale.
 - c. Green Log Debarker. Each log merchandisers consists of one debarking unit that separates green saw logs from the bark with dual rotating knives. The separated bark is conveyed by gravity feed to storage for shipment off site for sale.
 - d. Cross Cutting. Each log merchandisers consists of a cross cutting section where the debarked logs are scanned and evaluated in lengths and diameter to predict the effective segmentation of the log for the cross-cutting section, where they are cut into a specific length.
 - e. Common Intersection. A common intersection consisting of several buffer decks where debarked logs from the two log merchandisers are combined and sent to the green log sorting line.
- [Permit No. 1210468-009-AC]

Essential Potential to Emit (PTE) Parameters

- D.2.** Permitted Capacity: This emission unit shall not exceed a maximum throughput of 1,137,000 tons/year of lumber. [Rules 62-4.070, 62-210.200(PTE) & 62-212.400(12), F.A.C.; and Permit No. 1210468-009-AC]
- D.12.** Materials and Usage Records: Ten days following each calendar month, the permittee shall monitor and record the following on a monthly basis, rolled monthly, for 12 consecutive months:
- a. Records:

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(1) The weight, in tons, of the logs processed through the Debarker Nos. 1 and 2 to demonstrate compliance with **Specific Condition D.2.**

(2) The gallons of color, ink, and lacquer usage.

b. **Record Retention.** Records shall be maintained in a written (or electronic) log, available for inspection by the Compliance Authority, for a period of 5-years.

[Rules 62-4.070 & 62-62-212.400(12), F.A.C.; and Permit No. 1210468-009-AC]

18. To reflect the Actual Emissions Reporting required by Permit No. 1210468-009-AC, Specific Condition D.13. is added to Subsection D for EU 011- Log Storage, Processing, and Sawmill as follows:

D.13. Actual Emissions Reporting. Permit No. 1210468-009-AC is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for volatile organic compounds (VOC), particulate matter (PM), PM with a mean diameter of less than 10 microns (PM₁₀), and PM with a mean diameter of less than 2.5 microns PM_{2.5}. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

b. The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

(1) The name, address and telephone number of the owner or operator of the major stationary source;

(2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

(3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

(4) Any other information that the owner or operator wishes to include in the report.

c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual VOC, PM, PM₁₀, and PM_{2.5} emissions for Emission Units 003, 014, 007, 008, 009, 011:

(1) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of VOC, PM, PM₁₀, and PM_{2.5} as used in the application to establish baseline emissions.

(2) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 1210468-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

[Permitting Note: Baseline actual emissions of VOC were determined to be 253.7 tons, of PM were determined to be 15.6 tons, of PM₁₀ were determined to be 7.3 tons and of PM_{2.5} were determined to be 4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 2.42 tons, of PM₁₀ were determined to be 1.29 tons and of PM_{2.5} were determined to be 0.97 tons.]

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19. On August 30, 2024, EPA issued a final rule: **National Emission Standards for Hazardous Air Pollutants (NESHAP): Reciprocating Internal Combustion Engines (RICE) and New Source Performance Standards (NSPS): Internal Combustion Engines; Electronic Reporting**. This action finalized EPA amendments to the RICE NESHAP, the NSPS for Stationary Compression Ignition Internal Combustion Engines, and the NSPS for Stationary Spark Ignition Internal Combustion Engines, to add electronic reporting provisions. EPA also finalized a small number of clarifications and corrections to provide clarification and correct inadvertent and other minor errors in the Code of Federal Regulations, particularly related to tables.

- a. The appendices are updated to reflect these amendments.
- b. The Specific Conditions of Subsection E for Emission Unit 012 – Emergency Generator are revised to reflect the amendments as follows:

E.1. NSPS Subpart A. This emissions unit shall comply with all the applicable standards contained in 40 CFR 60 Subpart A – New Source Performance Standards - General Provision. Appendix NSPS Subpart A is included in the Appendices. Table 8 of 40 CFR 60 Subpart III shows which parts of the General Provisions in 40 CFR 60.1 through 60.19 are applicable. The general confidential business information (CBD) provisions apply as described in 40 CFR Part 2. [Rule 62-204.800, F.A.C.; 40 CFR 60 Subpart A, 40 CFR 60.4218]

E.5. Restricted Hours of Operation. The permittee shall ~~comply with the following limitations for this~~ operate the emergency engine stationary ICE according to the requirements in paragraphs a. through c. of this Specific Condition. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60 Subpart III, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs a. through c. of this Specific Condition is prohibited. If permittee does not operate the engine according to the requirements in paragraphs a. through c. of this Specific Condition, the engine will not be considered an emergency engine under 40 CFR 60, Subpart III and ~~must~~ shall meet all requirements for non-emergency engines.

a. *Emergency Situations.* There is no time limit on the use of emergency stationary ICE in emergency situations. [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4211(f)(1)]

b. *Maintenance and Testing.* This emergency stationary ICE ~~is authorized to operate~~ may be operated for the purpose in paragraph b.1. below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph c. below counts as part of the 100 hours per calendar year allowed by this paragraph.

1. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. ~~Maintenance checks and readiness testing of such units is limited to 100 hours per year.~~ The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4211(f)(2)(i)]

c. *Non-emergency Situations.* This emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing ~~and emergency demand response~~ provided in paragraph b., above. Except as provided in paragraph c.1. below, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to ~~supply power to~~ an electric grid or otherwise supply power as part of a financial arrangement with another entity.

1. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

- i. The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

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- ii. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- iii. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- iv. The power is provided only to the facility itself or to support the local transmission and distribution system.
- v. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4211(f)(3)]

20. Specific Condition E.10. of Permit No. 1210468-008-AV is separated into two specific conditions, Nos. E.9. and E.11. in this draft permit:

E.9. The permittee shall comply with the emission standards in **Specific Conditions E.6. through Error!** Reference source not found.in over the entire life of the engine.
[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4206]

Compliance Requirements

E.11. Operation and Maintenance. The permittee shall comply with all of the requirements specified in this specific condition except as permitted under **Specific Condition E.13. below.**

- a. Operate and maintain this engine and control device according to the manufacturer's emission-related written instructions;
- b. In addition, permittee may only Change only those emission-related settings that are permitted by the manufacturer; and
- c. Meet the requirements of 40 CFR 1068, as applicable. The RICE shall be maintained and operated to meet the emissions limits in over the entire life of the engine.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4206 & 4211(a)]

21. A new Specific Condition E.12. is added to the draft permit to reflect the applicable requirements in 40 CFR 60.4211(c):

E.12. Emergency Engine. The permittee shall comply by purchasing an engine certified to the emission standards in **Specific Conditions E.6. through E.8 above** for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's emission-related specifications, except as permitted in **Specific Condition E.13. below.** [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4211(c)]

Test Methods and Procedures

E.14. Testing Requirements. In the event performance tests are required pursuant to **Specific Condition E.13.**, the following requirements shall be met:

- a. Testing Procedures. The performance test shall be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F. Alternatively, stationary CIICE that are complying with Tier 2 or Tier 3 emission standards as described in 40 CFR part 1039, appendix I, or with Tier 2 emission standards as described in 40 CFR part 1042, appendix I, may follow the testing procedures specified in 40 CFR 60.4213, as appropriate.
- b. NTE Standards. Exhaust emissions from the engine stationary CIICE subject to Tier 2 or Tier 3 emission standards as described in 40 CFR part 1039, appendix I, or Tier 2 emission standards as described in 40 CFR part 1042, appendix I, shall not exceed the not-to-exceed (NTE) numerical

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requirements, rounded to the same number of decimal places as the applicable standard (STD) in **Specific Conditions E.6. to E.8.**, determined from the following equation:

NTE Requirement For Each Pollutant = $(1.25) \times (\text{STD})$ (Eq. 1)

Where:

STD = The standard specified for that pollutant in 40 CFR 1039 or 1042, as applicable.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4212(a) & (c)]

E.19. Beginning on February 26, 2025 Report – Performance Testing. Beginning on February 26, 2025, within 60 days after the date of completing each performance test required by 40 CFR 60 Subpart IIII, the permittee shall submit the results following the procedures specified in paragraphs of this Specific Condition.

- a. Data collected using test methods that are supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test. Submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), according to **Specific Condition E.20.** The data shall be submitted in a file format generated using the EPA's ERT. Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.
- b. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test. The results of the performance test shall be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI according to **Specific Condition E.20.**

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4214(f)]

E.20. Notifications and Report Submittals to EPA. If required to submit notifications or reports following the procedure specified in this paragraph, the notifications or reports shall be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice to the permittee. Do not use CEDRI to submit information the permittee claims as CBI. Although we do not expect persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report or notification, the permittee shall submit a complete file in the format specified in 40 CFR Subpart IIII, including information claimed to be CBI, to the EPA following the procedures in paragraphs a. and b. below of this Specific Condition. Clearly mark the part or all of the information that are claimed to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR Part 2. All CBI claims shall be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. The permittee shall submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described earlier in this paragraph.

- a. The preferred method to receive CBI is for it to be transmitted electronically using email attachments, File Transfer Protocol, or other online file sharing services. Electronic submissions shall be transmitted directly to the OAQPS CBI Office at the email address oaqpscbi@epa.gov, and as described in 40 CFR 60.4245(g), should include clear CBI markings. ERT files should be flagged to the attention of the Group Leader, Measurement Policy Group; all other files should be flagged to the attention of the Stationary Compression Ignition Internal Combustion Engine Sector Lead. If assistance is needed with submitting large electronic files that exceed the file size limit for email attachments, and if the permittee does not have their own file sharing service, please email oaqpscbi@epa.gov to request a file transfer link.

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- b. If the permittee cannot transmit the file electronically, CBI information may be sent through the postal service to the following address: OAQPS Document Control Officer (C404-02), OAQPS, U.S. Environmental Protection Agency, 109 T.W. Alexander Drive, P.O. Box 12055, Research Triangle Park, North Carolina 27711. ERT files should be sent to the attention of the Group Leader, Measurement Policy Group, and all other files should be sent to the attention of the Stationary Compression Ignition Internal Combustion Engine Sector Lead. The mailed CBI material should be double wrapped and clearly marked. Any CBI markings should not show through the outer envelope. [Rule 62-204.800(8)(b)82, F.A.C.; 40 CFR 60.4214(g)]

E.21. CEDRI Report Submittal – Claim of EPA System Outage Assertion. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, a claim of EPA system outage for failure to timely comply with that reporting requirement may be asserted. To assert a claim of EPA system outage, the permittee shall meet the requirements outlined in **paragraphs a. through g. of this Specific Condition.**

- a. The permittee shall have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems.
- b. The outage shall have occurred within the period of time beginning five business days prior to the date that the submission is due.
- c. The outage may be planned or unplanned.
- d. The permittee shall submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.
- e. The permittee shall provide to the Administrator a written description identifying:
 - (1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;
 - (2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;
 - (3) A description of measures taken or to be taken to minimize the delay in reporting; and
 - (4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported.
- f. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.
- g. In any circumstance, the report shall be submitted electronically as soon as possible after the outage is resolved.

[Rule 62-204.800(8)(b)82, F.A.C.; 40 CFR 60.4214(h)]

E.22. CEDRI Report Submittal – Claim of Force Majeure. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, a claim of force majeure for failure to timely comply with that reporting requirement may be asserted. To assert a claim of force majeure, the permittee shall meet the requirements outlined in **paragraphs a. through e. of this Specific Condition.**

- a. The permittee may submit a claim if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due. For the purposes of 40 CFR 60.4214(i), a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (*e.g.*, hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (*e.g.*, large scale power outage).
- b. The permittee shall submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.
- c. The permittee shall provide to the Administrator:
 - (1) A written description of the force majeure event;

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- (2) A rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event;
 - (3) A description of measures taken or to be taken to minimize the delay in reporting; and
 - (4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported.
 - d. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator.
 - e. In any circumstance, the reporting shall occur as soon as possible after the force majeure event occurs.
- [Rule 62-204.800(8)(b)82, F.A.C.; 40 CFR 60.4214(i)]

E.23. Records Submitted Electronically. Any records required to be maintained by 40 CFR 60 Subpart IIII that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.
[Rule 62-204.800(8)(b)82, F.A.C.; 40 CFR 60.4214(j)]

22. Appendix 40 CFR 63 Subpart DDDDD, NESHAP Industrial, Commercial, and Institutional Boilers and Process Heaters is updated to reflect the latest version of the subpart.

23. The applicable 40 CFR 60, Subpart Dc recordkeeping requirements of 40 CFR 60.48c(g)(1),(2), and (3) are added Subsection A for Boiler No. 1 (EU 003).

A.23. Natural Gas Combustion Records- NSPS Subpart Dc.

- a. The permittee shall record and maintain records of the amount of natural gas combusted during each operating day.
 - b. As an alternative to maintaining records of the amount of natural gas combusted during each operating day, the permittee may elect to record and maintain records of the amount of natural gas combusted during each calendar month.
- [Rule 62-204.800(8)(b), F.A.C.; and 40 CFR 60.48c(g)(1) and (2)]

A.24. NSPS Subpart Dc Recordkeeping. The permittee shall comply with the following recordkeeping provisions as an alternative to the requirements in **Specific Condition A.23 a.**

- a. If all steam generating units in the facility (including steam generating units not subject to 40 CFR 60, Subpart Dc) combust natural gas and distillate oil meeting the most current requirements of 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to the facility property during each calendar month.
- b. All records required under this **specific condition** shall be maintained by the permittee for a period of 5 years following the date of such records.

[Rule 62-204.800(8)(b) & 62-213.440(1)(b)2.b., F.A.C.; and 40 CFR 60.48c(g)(3) & (i)]

*{Permitting Note: Use of the recordkeeping options in 40 CFR 60.48c(g)(3) (see **paragraph b.** and Appendix NSPS, Subpart Dc) is predicated on all steam generating units burning fuel that is compliant with SO₂ standards in NSPS Subpart Dc. The recordkeeping options in 40 CFR 60.48c(g)(3) may also be used if every steam generating unit in the facility is only burning natural gas.}*

24. Appendix I of the current Title V Permit includes a listed "Onsite vehicle diesel refueling station and 10,000-gallon storage tank" and also "One 10,000-gallon diesel storage fixed roof tank". The facility confirmed in the RAI response dated January 3, 2025 that the two listed items are describing the same storage tank and requested that the item be listed in Appendix I of the renewed permit as "On-site vehicle diesel refueling station and one, 10,000-gallon diesel storage fixed roof tank".

Based on this request, Appendix I is revised as requested.

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25. Appendix 40 CFR 75 Section 5, Measurement of Boiler Heat Input Rate is removed from the renewed permit as the introduction states that Appendix F of 40 CFR 75 is a procedure the facility may utilize instead of the ASME procedure given in Appendix ASME to calculate the heat input rate to the biomass boiler. As stated in Condition 2, Section 2. Administrative Requirements of Permit No. 1210468-009-AC, Biomass Boilers (EU 001 and EU 002) authorized to be installed in Permit No. 1210468-001-AC (PSD-FL-417), issued 5/9/2012, were not constructed. Appendix ASME, ASME Form for Abbreviated Efficiency Test was removed from the Title V Permit in Permit No. 1210468-008-AV as a result of the revision in Permit No. 1210468-007-AC which removed the requirement that a thermal efficiency test conducted every 12-month period prior to renewal of any operation permit for EU 003 and EU 004.

CONCLUSION

This project revises Title V air operation Permit No. 121468-005-AV, which was effective on April 4, 2022. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.