# Binderholz Live Oak, LLC Suwannee Mill

Facility ID No. 1210468 Suwannee County

# Title V Air Operation Permit Revision

# Permit No. 1210468-011-AV

(Revision of Title V Air Operation Permit No. 1210468-005-AV)



# **Permitting Authority:**

State of Florida Department of Environmental Protection Northeast District Office

8800 Baymeadows Way West, Suite 100 Jacksonville, Florida 32256 Telephone: (904) 256-1700 Email: DEP\_NED@floridadep.gov

# **Compliance Authority:**

Compliance Assurance
Department of Environmental Protection
Northeast District Office

8800 Baymeadows Way West, Suite 100 Jacksonville, Florida 32256 Telephone: (904) 256-1700 Email: DEP\_NED@floridadep.gov

# Title V Air Operation Permit Revision

Permit No. 1210468-011-AV

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Appendix 24-M-AP, Alternate Test Method 10 Approval for Boiler No. 1.

#### Referenced Attachments.

Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).

Table H, Permit History.



# FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis Governor

Alexis A. Lambert Secretary

Northeast District 8800 Baymeadows Way West, Suite 100 Jacksonville, Florida 32256

**PERMITTEE:** 

Binderholz Live Oak, LLC 17152 46<sup>th</sup> Trace Live Oak, Florida 32060 Permit No. 1210468-011-AV Suwannee Mill Facility ID No. 1210468 Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility 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. The existing Suwannee Mill is located in Suwannee County at 17152 46th Trace, Live Oak. The UTM coordinates of the facility are Zone 17, 297.600 kilometers (km) East and 3,360.700 km North.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

1210468-011-AV Effective Date: May 6, 2025

1210468-008-AV Effective Date: November 30, 2022 1210468-005-AV Effective Date: April 4, 2022 Renewal Application Due Date: August 22, 2026 Expiration Date: April 4, 2027

Katie Sula Miller

Permit Program Administrator

KSM/lm/rfs

# Subsection A. Facility Description.

The Suwannee Mill is capable of producing up to 326.7 million board feet per year (MMBF/yr) of lumber. The facility includes the following operations: 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.

# Subsection B. Summary of Emissions Units.

EU No.	Brief Description	
Regulated I	Regulated Emissions Units	
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	
014	Boiler No. 2	

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

# Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received 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).
Federal Rule Citations	
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
40 CFR 63, Subpart DDDD	007
40 CFR 63, Subpart ZZZZ	012
40 CFR 63, Subpart DDDDD	003 and 014
State Rule Citations	
62-4 Permits	003, 007, 011, 012, and 014
62-204 Air Pollution Control – General Provisions	

# SECTION I. FACILITY INFORMATION.

State Rule Citations	
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	003, 007, 011, 012, and 014
62-296 Stationary Sources – Emission Standards	
62-297 Stationary Sources – Emissions Monitoring	

#### The following conditions apply facility-wide to all emission units and activities:

**FW1.** Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

#### **Emissions and Controls**

- **FW2.** Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
- **FW3.** General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

- **FW4.** General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]
- **FW5.** <u>Unconfined Particulate Matter</u>. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
  - a. Paving and maintenance of all process and storage areas.;
  - b. Paving and maintenance of the majority of material transfer routes;
  - c. Application of water or chemicals to control fugitive emissions from road traffic as necessary;
  - d. Removal of particulate matter from roads and other paved areas to prevent re-entrainment;
  - e. Exercise good housekeeping practices at all times; and;
  - f. Use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter;
  - g. The sawmill, sorter line, and planer mill are located inside buildings,
  - h. the high moisture content of the bark, wood chips, and sawdust stored minimizes fugitive particulate matter resulting from byproduct handling and storage.

In determining what constitutes reasonable precautions for a facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice and the degree of reduction of emissions expected from a technique or practice. See also Appendix Best Management Practices

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit renewal application received September 17, 2021.]

#### **Reports and Fees**

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: https://floridadep.gov/air/permitting-compliance/content/title-v-fees. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <a href="https://floridadep.gov/air/permitting-compliance/content/annual-operating-report">https://floridadep.gov/air/permitting-compliance/content/annual-operating-report</a>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each vear.}

**FW7.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. (See also Appendix RR, Conditions RR1 and RR7.) The annual statement of compliance can be submitted to the U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) on EPA's Central Data Exchange (CDX) at <a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

- **FW8.** Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:
  - a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: <a href="https://cdx.epa.gov">https://cdx.epa.gov</a>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <a href="http://www2.epa.gov/rmp">http://www2.epa.gov/rmp</a>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

**FW9.** Semi-Annual Reports. The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports at least every six months to the compliance office. Each semi-annual report shall cover the 6-month periods of January 1 – June 30 and July 1 – December 31. The reports shall be submitted by the 60<sup>th</sup> day following the end of each calendar half (i.e., March 1<sup>st</sup> and August 29<sup>th</sup> of every year). All instances of deviations from permit requirements (including conditions in the referenced Appendices) must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. If there are no deviations during the reporting period, the report shall so indicate. Any semi-annual reporting requirements contained in applicable federal NSPS or NESHAP requirements may be submitted as part of this report. The submittal dates specified above shall replace the submittal dates specified in the federal rules. All additional reports submitted as part of this report should be clearly identified according to the specific federal requirement. All reports shall include a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. (See also Conditions RR2. – RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.) [Rule 62-213.440(1)(b)3.a., F.A.C.; and, 40 CFR 60.19(d), & 40 CFR 63.10(a)(5)]

{Permitting Note: EPA has clarified that, pursuant to 40 CFR 70.6(a)(3), the word "monitoring" is used in a broad sense and means monitoring (i.e., paying attention to) the compliance of the source with all emissions limitations, standards, and work practices specified in the permit.}

#### Other Requirements

**FW10.** Objectionable Odors Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C. and Permit No. 1210468-001-AC/PSD-FL-417]

{Permitting Note: An objectionable odor is defined in Rule 62-210.200(Definitions), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property; or which creates a nuisance.}

**FW11.** Open Burning Prohibited. No person shall ignite, cause to be ignited or permit to be ignited any material which will result in any prohibited open burning as regulated by Chapter 62-256, F.A.C.; nor shall any person suffer, allow, conduct or maintain any prohibited open burning.

[Rule 62-256.300, F.A.C.]

# Subsection A. Emissions Units 003–Boiler No. 1

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

EU No.	Brief Description
003	Boiler No. 1

*Description*: One natural gas boiler is used to generate the hot water that is used in the lumber kiln drying process. Boiler No. 1 shares a common stack with Boiler No. 2 (EU 014).

*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 particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), VOC, opacity and HAP. Low NO<sub>x</sub> burners and flue gas recirculation (FGR) further minimize NO<sub>x</sub> 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 003 Initial startup date: April 1, 2012. March 26, 2021 is the most recent startup date after prolonged shutdown since April 2019.

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 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. 1210468-001-AC (PSD-FL-417)]

# **NESHAP Applicability**

A.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 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)]

# Subsection A. Emissions Units 003–Boiler No. 1

A.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 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)]

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

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

Unit No.	MMBtu/hr	Fuel Type
003	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.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.]
- A.6. Authorized Fuels. The boiler is authorized to only combust natural gas. Natural gas flow meters shall be installed, operated, and maintained on 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]

- A.7. Boiler Hot Water Output. The maximum hot water output for the natural gas fired boiler is 120,727gallons 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. 1210468-009-AC]
- **A.8.** 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. 1210468-001-AC (PSD-FL-417)]

# **Control Technology**

- **A.9.** <u>Air Pollution Control Equipment</u>. 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 boiler.
  - a.  $Low NO_X Burners$ : The permittee shall operate and maintain low  $NO_X$  burners on the boiler to achieve the  $NO_X$  standard specified in **Specific Condition A.10.**
  - b. Flue Gas Recirculation (FGR): The permittee shall operate and maintain a FGR system on the boiler to reduce NO<sub>X</sub> emissions in the flue gas exhaust and achieve the NO<sub>X</sub> emissions standard-specified in **Specific Condition A.10**.

{Permitting Note: Emissions of Sulfur Dioxide  $(SO_2)$  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]

#### Subsection A. Emissions Units 003–Boiler No. 1

# **Emission Limitations and Standards**

**A.10.** 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.

Pollutant	Emission Limit (lb/MMBtu)	Test Frequency <sup>a</sup>	Basis
$NO_X$	0.036 lb/MMBtu	(I)	BACT
	2 gr of S/100 scf	FM <sup>b</sup>	Reasonable Assurance
$\mathrm{SO}_2$	Sulfur dioxide (SO <sub>2</sub> ) emissions from Boiler No. 1 shall be reduced by the firing of natural gas		Rule 62- 296.406(3)(BA CT), F.A.C
CO	0.039 lb/MMBtu	(I, A)	BACT
$PM/PM_{10}/PM_{2.5}$ <sup>c</sup>	2 gr of S/100 scf	FM <sup>b</sup>	BACT
PM	PM emissions from Boiler No. 1 shall be reduced by the firing of natural gas		Rule 62- 296.406(2)(BA CT), F.A.C
VOC	0.003 lb/MMBtu	(I)	BACT
	10% opacity (6-minute blocks) except for up to 20% opacity for one, 6-minute block per hour <sup>d</sup>	(I, A)	Reasonable Assurance
Opacity <sup>d</sup>	20% opacity except for one 6- minute period per one-hour period during which opacity shall not exceed 27%	(A)	62-296.406, F.A.C.
Conduct a tune-up of the boiler annually as specified in <b>Specific Condition A.17</b> . (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	

a. Initial (I) and (A) annual stack tests.

[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. 1210468-009-AC]

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.

c. The fuel sulfur specification and the visible emissions standard represent BACT for  $PM/PM_{10}/PM_{2.5}$ . The estimated filterable PM emissions rate is 0.002 lb/MMBtu.

d. 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%.

#### Subsection A. Emissions Units 003–Boiler No. 1

# Startup, Shutdown and Malfunction

- A.11. Malfunction Notifications. In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with the following: If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately (within one working day) notify the Compliance Authority. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the permittee's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. If requested by the Compliance Authority, the permittee shall submit a quarterly written report describing the malfunction. [Rules 62-210.700(6) and 62-4.130, F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]
- **A.12.** <u>Startup, Shutdown and Maintenance Procedures</u>. Appendix Boiler, Startup, Shutdown and Maintenance Procedures contains this information. [Rule 62-210.700(6)]

# **Test Methods and Procedures**

**A.13.** <u>Test Methods</u>. 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 <sub>X</sub> Emissions (Instrumental)
9	Visual Determination of the Opacity
10	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 <sub>X</sub> , PM, and SO <sub>2</sub> 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]

**A.14.** 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 <a href="http://www.fldepportal.com/go/home">http://www.fldepportal.com/go/home</a> 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

# Subsection A. Emissions Units 003–Boiler No. 1

- Notifications. Once in the process, just carefully read the instructions on each screen (and under the Help tabs) to complete the notification.}
- A.15. Annual Compliance Tests Required. Compliance stack tests for CO and opacity limits given in **Specific Condition A.10.** shall be conducted during each calendar year (January 1<sup>st</sup> to December 31<sup>th</sup>). Tests shall be conducted between 90% and 100% of the maximum heat input rate when firing only the primary fuels. The Department may require the permittee to repeat some or all of the stack testing for CO, NO<sub>x</sub>, VOC, and opacity after major replacement or major repair of any air pollution control or process equipment. [Rules 62-212.400(5)(c) and 62-297.310(8)(a) and (b), F.A.C.; 40 CFR 60.8]
- **A.16.** 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.]
- **A.17.** 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. 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. 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;
  - c. 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. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
  - e. 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. Maintain on-site and submit, if requested by the Department, a report containing the information in paragraphs f.1. 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)]

#### Subsection A. Emissions Units 003–Boiler No. 1

#### **Notification**

- **A.18.** 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)

- **A.19.** 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)]

# **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 (PSD-FL-417), and 1210468-009-AC]
- **A.21.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]
- **A.22.** Monthly Operations Summary. By the tenth calendar day of each month, the permittee shall record the following in a written or electronic log for the previous month of operation: hours of operation, cubic feet of natural gas, hot water volume, and the updated 12-month rolling totals for each of these operating parameters. The Monthly Operations Summary shall be maintained on site and made available for inspection when requested by the Department.
  - [Rule 62-4.070, and 62-212.400(BACT), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]
- **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.

# Subsection A. Emissions Units 003–Boiler No. 1

[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 SO<sub>2</sub> 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  $SO_2$  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.}

**A.25.** 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(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:

- 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), 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. 1210468-009-AC]

- **A.26.** 40 CFR 63 Subpart DDDDD Annual Compliance Report. The permittee shall submit an annual compliance report as specified in **this Specific Condition**.
  - a. Annual compliance reports shall cover the applicable 1-year periods from January 1 to December 31.
  - b. Annual-year compliance reports 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)]
- **A.27.** <u>40 CFR 63 Subpart DDDDD Compliance Reports</u>. The compliance report 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) 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.
  - (5) 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

# Subsection A. Emissions Units 003–Boiler No. 1

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

- A.28. 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 (<a href="http://www.epa.gov/ttn/chief/cedri/index.html">http://www.epa.gov/ttn/chief/cedri/index.html</a>), 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), F.A.C.]
- **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 (PM<sub>10</sub>), and PM with a mean diameter of less than 2.5 microns PM<sub>2.5</sub>. 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 PM2.5 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 PM2.5 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

# Subsection A. Emissions Units 003–Boiler No. 1

4.9 tons. The demand growth emissions of VOC were determined to be 82.5 tons, of PM were determined to be 0.97 tons.}

# **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)]
- **A.31.** Fuel Flow Meter. A fuel flow meter shall be installed on the natural gas fired boiler to record the volume of natural gas used in the boiler on an hourly, monthly and 12-month rolling total basis. [Permit Nos. 1210468-001-AC (PSD-FL-417) and 1210468-009-AC]

# Subsection B. Emissions Unit 007 Drying Kilns

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

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

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.}

# **NESHAP Applicability**

NESHAP Subpart DDDD. The drying kilns are subject NESHAP Subpart DDDD in 40 CFR 63 for Plywood and Composite Wood Products.
 [NESHAP Subpart DDDD, 40 CFR 63; Permit No. 1210468-001-AC (PSD-FL-417)]

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

- **B.2.** Hours of Operation. The hours of operation of each kiln 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)]
- **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]
- **B.4.** 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.]

#### **Emission Limitations and Standards**

**B.5.** <u>VOC Emissions</u>. VOC emissions shall be minimized by the use of good design and operating practices. Operating practices shall include, but not be limited to, a drying temperature of approximately 300°F or less and long dying cycles (e.g., 2.3 to 10 days depending on moisture content and required market specifications).

{Permitting Note: The work practice standards are established as BACT for VOC emissions from drying kilns and are expected to result in a nominal VOC emission rate of 3.5 pound per thousand board feet (lb/MBF.}

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

**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/PM $_{10}$ /PM $_{2.5}$  emissions from drying kilns and are expected to result in the following nominal emissions: 0.022 lb PM/MBF, 0.0128 lb PM $_{10}$ /MBF, and 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)]

# Subsection B. Emissions Unit 007 Drying Kilns

# **Test Methods and Procedures**

**B.7.** <u>Test Methods</u>. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments	
EPA 9	Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources (60 Minute Test)	

The test methods are specified in Appendix A 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]

**B.8.** 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.]

**B.9.** Annual Compliance Tests. During each calendar year (January 1<sup>st</sup> to December 31<sup>th</sup>), one representative kiln vent shall be tested to demonstrate compliance with the visible emissions standard specified in **Specific Condition B.6.** of this subsection.

[Rules 62-210.200 (PTE), 62-212.400(BACT), 62-297.310(a), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]

**B.10.** <u>Test Requirements</u>. 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.]

# **Recordkeeping and Reporting Requirements**

**B.11.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

[Rule 62-213.440(1)(b), F.A.C.]

- **B.12.** Annual Operating Report (AOR). Emissions for the AOR shall be based on the annual board feet dried and the emissions factors identified for VOC and PM. [Rule 62-210.370(4), F.A.C.]
- **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 (PM<sub>10</sub>), and PM with a mean diameter of less than 2.5 microns PM<sub>2.5</sub>. 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:

# Subsection B. Emissions Unit 007 Drying Kilns

- (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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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.}

# Subsection C. Emissions Units 008 and 009- Planer Mill, Sorter and Trimmer

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

EU No.	<b>Brief Description</b>
008	A Planer Mill Line with a Dry Shaving Silo
009	A Sorter Line Trimmer

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 ft<sup>3</sup> 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.}

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

- C.1. Hours of Operation. The hours of operation of the planer mill line and the sorter line are not restricted (8,760 hours per year).
   [Rule 62-210.200(PTE), F.A.C.; and, Permit No. 1210468-001-AC (PSD-FL-417)]
- C.2. 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.]

# **Control Technology**

C.3. Silo Baghouse. 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.; 1210468-009-AC (PSD-FL-417A)]

#### **Emission Limitations and Standards**

**C.4.** <u>VE Standard</u>. Visible emissions from the silo baghouse shall not exceed 5% opacity as demonstrated by annual compliance tests.

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

# Subsection C. Emissions Units 008 and 009- Planer Mill, Sorter and Trimmer

# **Test Methods and Procedures**

**C.5.** <u>Test Methods</u>. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments	
EPA 9	Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources (60 Minute	
	Test)	

The test methods are specified in Appendix A 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.

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

- **C.6.** 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.]
- C.7. <u>Test Requirements</u>. 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.]
- C.8. <u>Annual Compliance Tests</u>. During each calendar year (January 1<sup>st</sup> to December 31<sup>th</sup>), the silo shall be tested to demonstrate compliance with the VE emissions standard specified in **Specific Condition C.4.** of this subsection.

[Rules 62-212.400(BACT), 62-297.310(8), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]

# **Recordkeeping and Reporting Requirements**

C.9. <u>Baghouse Records</u>. 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. 1210468-009-AC (PSD-FL-417A)]

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

- **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 (PM<sub>10</sub>), and PM with a mean diameter of less than 2.5 microns PM<sub>2.5</sub>. 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;

# Subsection C. Emissions Units 008 and 009- Planer Mill, Sorter and Trimmer

- (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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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.}

**C.11.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

# Other Requirements

C.12. Compliance with Best Management Practices. The permittee shall comply with precautions as listed in Appendix BMP- Best Management Practices. [Rule 62-212.400 (BACT), F.A.C.]

# Subsection D. Emissions Unit 011- Log Storage, Processing, and Sawmill

# 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. 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. 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. 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.}

# Subsection D. Emissions Unit 011- Log Storage, Processing, and Sawmill

# Equipment

- **D.1.** <u>Log Merchandisers</u>. 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.3.** Hours of Operation. The hours of operation of the planer mill line and the sorter line are not restricted (8,760 hours per year).

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

**D.4.** 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.]

# **Control Technology**

D.5. Sawing, Sorting and Trimming Baghouse. The permittee shall operate and maintain a baghouse to control PM emissions of saw dust from the four green lumber sorting and trimming lines. Wet sawdust from the green lumber sorting lines 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.; Permit No. 1210468-009-AC (PSD-FL-417A)]

#### **Emission Limitations and Standards**

**D.6.** <u>VE Standard</u>. Visible emissions from the baghouse shall not exceed 5% opacity as demonstrated by an annual compliance test.

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

# Subsection D. Emissions Unit 011- Log Storage, Processing, and Sawmill

# **Test Methods and Procedures**

**D.7.** <u>Test Methods</u>. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
EPA 9	Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources (60 Minute Test)

The test methods are specified in Appendix A 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.

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

**D.8.** <u>Common Testing Requirements</u>. 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.]

**D.9.** <u>Test Requirements</u>. 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.]

**D.10.** Annual Compliance Tests. During each calendar year (January 1<sup>st</sup> to December 31<sup>th</sup>), each baghouse shall be tested to demonstrate compliance with the VE emissions standard specified in **Specific Condition D.6.** of this subsection.

[Rules 62-212.400(BACT), 62-297.310(8), F.A.C.; Permit No. 1210468-001-AC (PSD-FL-417)]

# **Recordkeeping and Reporting Requirements**

**D.11.** <u>Baghouse Records.</u> 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. 1210468-009-AC (PSD-FL-417A)]

- **D.12.** <u>Materials and Usage Records.</u> 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:
    - (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]

- **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 (PM<sub>10</sub>), and PM with a mean diameter of less than 2.5 microns PM<sub>2.5</sub>. 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

# Subsection D. Emissions Unit 011- Log Storage, Processing, and Sawmill

- 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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.}

**D.14.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

[Rule 62-213.440(1)(b), F.A.C.]

# Subsection E. Emissions Unit 012 An Emergency generator

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

EU No.	Brief Description
012	An Emergency Generator: One stationary compression ignition reciprocating internal combustion engine (RICE) that has a maximum engine power output rating of 32.1 brake-horsepower (bhp) at 100% load or less. The electrical generator has a maximum nominal power rating of 23.9 kilowatt (kW) or less. The emergency generator provides backup electrical power in the event of a power outage at the Suwannee Mill. The dieselfueld generator is limited in operation during emergencies or operated no more than 100 hours per year for testing, maintenance, or other approved purposes per NSPS Subpart IIII in 40 CFR 60. The engine shall meet the federal emission standards specified in NSPS Subpart IIII of 40 CFR Part 60.

# ONE EMERGENCY GENERATOR 9 (32.1 BHP/23.9 kW)

Manufacturer	Model	Engine Year Built/DOM	Engine Hp	Generator kW
Perkins	404D-22G*	2008+	32.1	23.9
* See Appendix Engine Specification for more details.				

{Permitting Notes: This emergency compression ignition reciprocating internal combustion engine (CI RICE) is regulated under 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR 60, Subpart IIII – Standards of performance for Stationary Compression Ignition Internal Combustion Engines, adopted in Rules 62.204.800(11)(b) & (8)(b), F.A.C., respectively. This permit section addresses "new" stationary emergency CI RICE with a displacement of less than 10 liters per cylinder, located at a major source of HAP, that commenced construction on or after 6/12/2006. In accordance with provisions of 40 CFR 63.6590(c)(6), meeting the requirements of 40 CFR 60, Subpart IIII, satisfies compliance with the requirements of Subpart ZZZZ.}

#### **NSPS** applicability

- 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 IIII shows which parts of the General Provisions in 40 CFR 60.1 through 60.19 are applicable. The general confidential business information (CBI) 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.2.** NSPS Subpart IIII. This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart IIII New Source Performance Standards Stationary Compression Ignition Internal Combustion Engines. Appendix NSPS, Subpart IIII contains the provisions of 40 CFR 60 Subpart IIII. [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60 Subpart IIII]

# **NESHAP** applicability

**E.3.** NESHAP Subpart ZZZZ: This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants Stationary Reciprocating Internal Combustion Engines. Appendix NESHAP, Subpart ZZZZ contains the provisions of 40 CFR 63 Subpart ZZZZ.

[Rule 62-204.800(11)(b), F.A.C.; 40 CFR 60 Subpart IIII]

# Subsection E. Emissions Unit 012 An Emergency generator

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

- **E.4.** <u>Authorized Fuel.</u> This Stationary Internal Combustion Engine (ICE) shall use diesel fuel that meets the following requirements for non-road diesel fuel:
  - a. *Sulfur Content*. The sulfur content shall not exceed = 15 ppm = 0.0015% by weight (ultra-low sulfur) for non-road fuel.
  - b. *Cetane and Aromatic*. The fuel must have a minimum cetane index of 40 or must have a maximum aromatic content of 35 volume percent.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4207(b), 80.510(b)]

- E.5. Restricted Hours of Operation. The permittee shall operate the emergency 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 IIII, 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 IIII and 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 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. 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 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 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;
    - 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.

# Subsection E. Emissions Unit 012 An Emergency generator

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)]

# **Emission Limitations and Standards**

- **E.6.** NMHC + NO<sub>X</sub> Emissions. Emissions of non-methane hydrocarbons plus nitrogen oxide shall not exceed 7.5 grams per kilowatt-hour (g/KW-hr) and 5.6 grams per horsepower hour (g/HP-hr). [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4205(b), Table 2 of 40 CFR 60 Subpart IIII]
- E.7. CO Emissions. Emissions of carbon monoxide shall not exceed 5.5 g/KW-hr and 4.1 g/HP-hr. [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4205(b) Table 2 of 40 CFR 60 Subpart IIII]
- **E.8.** PM emissions. Emissions of particulate matter shall not exceed 0.30 g/KW-hr and 0.22 g/HP-hr. [40 CFR 60.4205(b) Table 2 of 40 CFR 60 Subpart IIII]
- **E.9.** The permittee shall comply with the emission standards in **Specific Conditions E.6.** through **E.8 above** in over the entire life of the engine. [Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4206]

# **Monitoring of Operations**

**E.10.** Hour Meter. The permittee shall install a non-resettable hour meter on each engine if one is not already installed.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4209(a)]

# **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. Change only those emission-related settings that are permitted by the manufacturer; and
  - c. Meet the requirements of 40 CFR 1068, as applicable.

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

- **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)]
- **E.13.** Compliance Requirements Due to Loss of Certification. If the engine and control device are not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, compliance shall be demonstrated as follows:
  - a. A maintenance plan and records of conducted maintenance shall be kept to demonstrate compliance,
  - b. To the extent practicable, the engine shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions; and in addition,
  - c. If the engine and control device are not installed and configured according to the manufacturer's emission-related written instructions, or the emission-related settings are changed in a way that is

# Subsection E. Emissions Unit 012 An Emergency generator

not permitted by the manufacturer, an initial performance test to demonstrate compliance with the applicable emission standards shall be conducted within 1 year of such action.

[Rule 62-204.800(8)(b)82., F.A.C.; 40 CFR 60.4211(g)(1)]

#### **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 CI ICE 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 stationary CI ICE 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 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) x (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.15.** 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.]

# **Recordkeeping and Reporting Requirements**

**E.16.** Testing Notification. At such time that the requirements of **Specific Condition E.13.** become applicable, the permittee shall notify the compliance authority of the date by which the initial compliance test shall be performed.

[Rule 62-213.440(1), F.A.C.]

**E.17.** Hours of Operation Records. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time.

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

- **E.18.** Maintenance Records. To demonstrate conformance with the manufacturer's written instructions for maintaining the certified engine and to document when compliance testing must be performed pursuant to **Specific Conditions E.13. and E.14.**, the permittee shall keep the following records:
  - a. Engine manufacturer data indicating compliance with the standards.
  - b. A copy of the manufacturer's written instructions for operation and maintenance of the certified engine.
  - c. A written maintenance log detailing the date and type of maintenance performed on the engine, as well as any deviations from the manufacturer's written instructions.

[Rule 62-213.440(1), F.A.C.; Rule 62-204.800(8)(b)82., F.A.C.; and, 40 CFR 60.4211(g)]

# Subsection E. Emissions Unit 012 An Emergency generator

- **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)]

- Notifications and Report Submittals to EPA. If required to submit notifications or reports following the E.20. 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 <code>oaqpscbi@epa.gov</code>, 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 <code>oaqpscbi@epa.gov</code> to request a file transfer link.
  - 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

# Subsection E. Emissions Unit 012 An Emergency generator

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:
    - (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

# Subsection E. Emissions Unit 012 An Emergency generator

- (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)]

# Subsection F. Emissions Unit 014 Boiler No. 2

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

EU No.	Brief Description
014	Boiler No. 2

*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]
- **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]

#### Subsection F. Emissions Unit 014 Boiler No. 2

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

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

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

[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.

Pollutant	Emission Limit (lb/MMBtu)	Test Frequency <sup>a</sup>	Basis
$SO_2$	Sulfur dioxide (SO <sub>2</sub> ) emissions from Boiler No. 2 shall be reduced by the firing of natural gas		Rule 62- 296.406(3)(BACT), F.A.C
PM	PM emissions from Boiler No. 2 shall be reduced by the firing of natural gas		Rule 62- 296.406(2)(BA CT), F.A.C
Opacity <sup>b</sup>	20% opacity except for one 6- minute period per one-hour period during which opacity shall not exceed 27%	(A)	62-296.406, F.A.C.
Conduct a tune-up of the boiler annually as specified in <b>Specific Condition F.15</b> . (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

a. (A) annual stack tests.

[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]

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%.

#### Subsection F. Emissions Unit 014 Boiler No. 2

#### **Test Methods and Procedures**

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

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity

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 <a href="http://www.fldepportal.com/go/home">http://www.fldepportal.com/go/home</a> 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 1<sup>st</sup> to December 31<sup>st</sup>), 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;

# Subsection F. Emissions Unit 014 Boiler No. 2

- 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<sub>X</sub> 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 f1.-f3. 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)]

#### Subsection F. Emissions Unit 014 Boiler No. 2

# **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 SO<sub>2</sub> 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  $40 \, \text{CFR} \, 60.48 c(g)(3)$  (see **paragraph b**. and Appendix NSPS, Subpart Dc) is predicated on all steam generating units burning fuel that is compliant with  $SO_2$  standards in NSPS Subpart Dc. The recordkeeping options in  $40 \, \text{CFR} \, 60.48 c(g)(3)$  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)]

# Subsection F. Emissions Unit 014 Boiler No. 2

- **F.23.** 40 CFR 63 Subpart DDDDD Compliance Reports. The permittee is required to submit an annual compliance report with the following information:
  - a. Company and Facility name and address.
  - b. Process unit information, emissions limitations, and operating parameter limitations.
  - c. Date of report and beginning and ending dates of the reporting period.
  - d. 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.
  - e. 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.]
- **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 (PM<sub>10</sub>), and PM with a mean diameter of less than 2.5 microns PM<sub>2.5</sub>. 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

# Subsection F. Emissions Unit 014 Boiler No. 2

following methods in reporting the actual annual VOC, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> 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, PM<sub>10</sub>, and PM<sub>2.5</sub> 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.}