Curle, Mary Beth

From: Adams, Timothy S. [TSADAMS@GAPAC.com]
Sent: Friday, May 25, 2007 9:39 AM
To: Curle, Mary Beth
Subject: RE: DEP Air Program request for additional information; Geogia-Pacific 0770010-005-AC

-----Original Message-----
From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Friday, May 25, 2007 10:37 AM
To: Adams, Timothy S.
Cc: Vest, Margaret M.; Bradburn, Rick; Sarasua, Armando; Fleck, John
Subject: DEP Air Program request for additional information; Geogia-Pacific 0770010-005-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s) by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". The document(s) may require immediate action within a specified time frame. Please open and review as soon as possible.

<<Georgia Pacific RAI.pdf>>

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

http://www.adobe.com/products/acrobat/readstep.html.

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Please advise this office of any changes to your e-mail address by contacting Mary Beth Curle at 850/595-8300, extension 1220 or mary.beth.curle@dep.state.fl.us. If you prefer to have documents sent via facsimile instead, please contact Ms. Curle.

Thank you.
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Curle, Mary Beth

From: Vest, Margaret M. [MMVEST@GAPAC.com]
Sent: Friday, May 25, 2007 9:46 AM
To: Curle, Mary Beth
Subject: RE: DEP Air Program request for additional information; Geogia-Pacific 0770010-005-AC

Received, thank you.

Margarete M Vest, P.E.
Sr Field Environmental Engineer
ph: 386-312-1191
fax: 404-749-2750
cell: 904-445-8761

-----Original Message-----
From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Friday, May 25, 2007 10:37 AM
To: Adams, Timothy S.
Cc: Vest, Margaret M.; Bradburn, Rick; Sarasua, Armando; Fleck, John
Subject: DEP Air Program request for additional information; Geogia-Pacific 0770010-005-AC

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FILE COPY

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 25, 2007

BY ELECTRONIC MAIL
tsadams@gapac.com

Mr. Timothy S. Adams
Plant Manager
Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Dear Mr. Adams:

This is to acknowledge receipt of your application, file number 0770010-005-AC, for an Air Construction Permit for the Georgia-Pacific Hosford OSB Plant in Liberty County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

However, in order to continue processing your application, please provide the information listed below pursuant to Rules 62-213.420(1)(b)3 and 62-4.070(1), F.A.C. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- The two modifications that were added to the re-submittal of the Air Construction application state that the calculations for the RTOs (EUs 01 and 02) need to be changed from 95% reduction of volatile HAPs to 90% reduction. Using the same uncontrolled emission factors feeding the RTOs, this should result in an increase in volatile HAPs emitted from the RTOs. These volatile HAPs are part of the specifically regulated VOCs. This amount of increase appears to be on the order of 37.02 tons per year increase for the combined EUs. Please explain why this increase was not calculated in your submittal.
- The calculation summary presented use 5.3217 tons per year of HAPs for the Foil Overlay project, but on the specific calculation figures of 5.98 and 7.18 tons per year HAPs are used. Please explain the use of different figures.
- The origin of the figures used for the uncontrolled emission factors is not detailed enough to verify. Please provide specific references for the emission factors used.

- The figure used for THC as carbon for VOC emissions appears to correspond to the permit limits. Please identify the units used in all the emissions calculation, whether they are on a carbon basis, a methane basis, a propane basis or as the actual molecular weight of the specific compounds.
- The use of 7.18 tons per year of HAPs for the Foil Overlay construction project will bring the overall increase of VOCs to 38.89 tons per year. Please explain why this application should not be submitted for PSD review.
- By receipt of your letter of May 24, 2007, you wish to have the EPSAP application released for modification. It is our understanding from Margarete Vest that you wish to remove the two modifications added to the re-submittal. Removal of the newly added modifications should substantially answer the questions above regarding the two modifications for the current time. Please summarize the changes to the permit application when you resubmit.

When referring to this project, please use the file number indicated above. [The EPSAP application (number 1392-2) will be electronically returned to you shortly after your receipt of this letter. Please update the EPSAP application accordingly and resubmit. If you decide to resubmit the requested additional information in hard copy, be aware it must be appropriately certified by the Responsible Official (R.O.) and Professional Engineer (P.E.), per Rules 62-213.420 and 62-4.05(3), F.A.C.]

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you have any questions, please contact John Fleck at 850/595-8300, extension 1232 or john.fleck@dep.state.fl.us.

Sincerely,

Rick Bradburn

Rick Bradburn
Air Program Administrator

RB/jf/c
c: Margarete Vest, Georgia-Pacific (mmvest@gapac.com)

Curle, Mary Beth

From: Adams, Timothy S. [TSADAMS@GAPAC.com]
Sent: Wednesday, March 28, 2007 3:02 PM
To: Curle, Mary Beth
Subject: RE: DEP Air Program request for information; Georgie-Pacific File No. 0770010-005-AC

-----Original Message-----
From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Wednesday, March 28, 2007 3:38 PM
To: Adams, Timothy S.
Cc: Vest, Margaret M.; Bradburn, Rick; Sarasua, Armando; Neubauer, Gerry; White, Tracy A.; Fleck, John
Subject: DEP Air Program request for information; Georgie-Pacific File No. 0770010-005-AC

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The Northwest District Air Resources Management Program is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community.
Please advise this office of any changes to your e-mail address by contacting Mary Beth Curle at 850/595-8300, extension 1220 or mary.beth.curle@dep.state.fl.us.
If you prefer to have documents sent via facsimile instead, please contact Ms. Curle and she will change your e-mail address to your FAX number.

When printing the attached document from Adobe Acrobat Reader, select "Document and comments" from the "Print What:" menu item; if this is not done the signature will not appear on the printed document.

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FILE COPY

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 28, 2007

BY ELECTRONIC MAIL
tsadams@gapac.com
Mr. Timothy Adams
Plant Manager
Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Dear Mr. Adams:

This is to acknowledge receipt of your application, file number 0770010-005-AC, for an Air Construction Permit for the Georgia-Pacific Hosford OSB Plant in Liberty County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. In order to continue processing your application, the Department will need the below additional information pursuant to Rules 62-213.420(1)(b)3 and 62-4.070(1), F.A.C. Evaluation of your proposed project will be delayed until all requested information has been received.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- Facility pollutant: Formaldehyde is classified as "A - Actual or potential emissions are above the applicable major source thresholds." The potential emissions sum is listed as zero. Please explain.

- Methanol is not listed as a facility pollutant, but is listed in the Application Identification Information under Applicant Comment and is also listed in the MSDS provided. Please explain.

- HAPs are identified as being present, but are not all listed in the Emission Unit Pollutant Information. Under the Applicant Comment: "HAPs emitted from the affected source include formaldehyde, vinyl acetate, acetaldehyde, and methanol." The MSDS provided for the glue lists acetaldehyde, vinyl acetate,

formaldehyde, and methanol as components. The Emission Estimates From Foil Overlay Process calculation sheet for potential to emit (PTE) provided with the application lists acetaldehyde 1.42 tpy, vinyl acetate 2.83 tpy, formaldehyde 0.35 and methanol 0.35 tpy as well as VOC 7.18 tpy. However the Emission Unit Pollutant Information only lists acetaldehyde, vinyl acetate and VOC and omits formaldehyde and methanol. Please explain.

- Under the Facility Identification Information, the item; "One or More EUs Subject to Emission Guidelines?" has no response. Please provide a response.

- The production for the OSB foil overlay was not identified as additional production or as existing production. Either would impact various EUs as well as fugitive emissions. Additional production would impact EU Nos. 3, 9, 8, 5, 2. Splitting off existing production for OSB foil overlay would impact EU Nos. 4, 6, 7, 9. Please describe the impact on other emissions due to the OSB foil overlay production.

- On the Emission Estimates page, the calculations; "...allow for other types of glue", suggests that other glues are being considered. If there are plans to use other glues, please specify and supply the MSDS for each.

When referring to this project, please use the file number indicated above. The EPSAP application (number 973-1) will be electronically returned to you shortly after your receipt of this letter. Please update the EPSAP application accordingly and resubmit. If Georgia-Pacific Wood Products LLC decides to resubmit the requested additional information in hard copy, be aware it must be appropriately certified by the Responsible Official (R.O.) and Professional Engineer (P.E.), per Rules 62-213.420 and 62-4.05(3), F.A.C.

The above comments require a response to the Department within 90 days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6, F.A.C. If you have any questions, please contact John Fleck at 850/595-8300, extension 1232 or john.fleck@dep.state.fl.us.

Sincerely,

Rick Bradburn

Rick Bradburn
Acting Air Program Administrator

RB/jf/c
c: Margarete Vest, Georgia-Pacific (mmvest@gapac.com)