Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: John Fleck
DATE: August 3, 2007
SUBJECT: Evaluation Summary for Georgia-Pacific Wood Products LLC, Hosford OSB Plant, 0770010-005-AC, Liberty County

We recommend issuing a permit to Georgia-Pacific Wood Products LLC to construct a Foil Overlay Production Line at the Hosford OSB Plant.

Process Description:
This construction permit is for the addition of a production line to manufacture Thermostat ® OSB Radiant Barrier Roof and Wall Sheathing. This product is to be manufactured by side-streaming a portion of the OSB boards into the new production line, roll coating adhesive onto the boards and laminating an aluminum foil/craft paper laminate onto the boards. HAP and VOC emissions from this process come from the adhesive used to attach the overlay. The Foil Overlay operation will be capable of operating 24 hours per day, 365 days per year and potentially process 7,884,000 OSB panels per year. The emission point of the affected source is the roller that applies the glue to the OSB panel. The glue dries at ambient temperature while the panel is in the final shipping unit/package. There will not be any change in the facilities maximum production rate of 600 million board feet on a 3/8-inch basis.

Pollution Control Equipment:
Emissions are fugitive and HAP emissions are controlled by using adhesive with ultra-low (<0.1%wt) HAP content. Record keeping is required to show compliance.

Environmental Impact:

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	N/A	N/A	N/A
SO2	N/A	N/A	N/A	N/A	N/A
VOC	N/A	N/A	7.2	N/A	N/A
NOx	N/A	N/A	N/A	N/A	N/A
CO	N/A	N/A	N/A	N/A	N/A
Total HAP		N/A	5.0	N/A	N/A
Individual HAP		N/A	2.8	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-296.320(4)b	N/A	N/A	Not more than 20% opacity	

Applicable Rules & Regulations:
This source is regulated in accordance with FAC Rule 62-204.800(11)(b)73.F.A.C.; 40 CFR 63 Subpart QQQQ.

The new production line is subject to 40 CFR Subpart QQQQ—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products because it is a source where surface coating is done in laminating of a wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building, [40 CFR 63.4681] and, it will be a new affected source that will be using more than 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of section 40 CFR 63.4681 and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). [40 CFR 63.4681(b)] The GP Hosford facility is an existing major source of HAP emissions, currently emitting more than 25 T HAP/yr.

The applicable wood building products source category is subcategory (a)(4) *Other interior panels.* panels that are sold for uses other than interior wall paneling, such as coated particleboard, hardboard, and perforated panels. [40 CFR 63.4681(a)(4)]

Permittee has chosen to demonstrate compliance with applicable emission limits via the *Compliant material option* specified in 40 CFR 63.4691(a). Permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690. Permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit(s) in §63.4690, and that each thinner and each cleaning material used contains no organic HAP. [40 CFR 63.4691]

Compliance Monitoring:
All identified emissions are fugitive and monitoring is done by record keeping of the number of panels processed, the amount of adhesive applied and the VOC and HAP content of the adhesive used. Monthly and twelve month rolling average will be used.

Compliance History:

Facility started production on April 20, 2005.
Compliance inspection in 2002- Noted the facility in compliance while undergoing construction.
2005 and 2006 Compliance Inspections noted the facility to be In-Compliance.

On 10/28/2005 inspector noted a slightly bluish plume exiting the dryer and RTO stacks. A compliance plan, which is included in this permit, has been submitted to the Department to research reasons for the bluish plume and compliance with the permitted opacity limit of 10% which has been exceeded.

The only out of compliance found in ARMS was for a failed VE test run May 20, 2006 for the five flake dryer with 2 RTOs. A short form consent order was executed October 2, 2006 and the case was closed October 23, 2006.

Fee Summary:
The Georgia-Pacific facility is a Title V source and therefore exempt from permitting fees. Emission fees are required annually from Title V facilities.

jf/c