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Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Georgia-Pacific Wood Products LLC
12995 Northeast State Road 65
Hosford, Florida 32334-0322

Authorized Representative:
Johnnie Temples, Plant Manager

Air Permit No. 0770010-010-AC
Permit Expires: August 25, 2015

Hosford OSB
Title V Air Construction Permit
Ink Jet Printer

This is the final air construction permit, which authorizes the installation of an inkjet printer for grade stamping the surface of wood panels. The proposed work will be conducted at the Hosford OSB facility, which is an oriented strand board manufacturing facility (Standard Industrial Classification No. 2493). The facility is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The UTM coordinates are Zone 16, 713.5 km East, and 3369.5 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida

Rick Bradburn

August 25, 2010

Rick Bradburn, Air Program Administrator (Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on August 25, 2010 to the persons listed below.

Johnnie Temples, Plant Manager, Georgia-Pacific Wood Products LLC: jrtemple@gapac.com
Eric Chang, Regional Environmental Manager, Georgia-Pacific Wood Products LLC: eric.chang@gapac.com
Mark Aguilar, P.E., Sr. Environmental Consultant, Georgia-Pacific Wood Products LLC: mjaguila@gapac.com
Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov
DEP Northwest District Branch Office, Tallahassee

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

MB Cule

8/25/10

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is currently operating under the Title V operating permit 0770010-003-AV. A draft Title V permit revision (0770010-007-AV), which revised permit 0770010-003-AV, and concurrent draft Title V air construction permit 0770010-011-AC were issued on May 26, 2010.

This Oriented Strand Board (OSB) facility consists of four principal manufacturing processes: (1) Furnish production, which includes debarking, slashing, and flaking; (2) flake drying; (3) forming and pressing; and (4) finishing, which consists of trimming (sawing), sanding and edge sealing. The facility has a maximum production rate of 600 million board feet based on a 3/8-inch thickness, per consecutive 12-month period.

The existing facility consists of the following emissions units:

Facility ID No. 0770010	
ID No.	**Emission Unit Description**
001	Five (5) flake dryers w/ two (2) RTOs (NESHAP)
002	Panel press w/ one RTO or TCO/RCO (NESHAP)
003	Screen fines w/ saw trim transfer BH exhaust
004	Saw trim/finishing BH exhaust
005	Mat reject/flying saw BH exhaust
006	Specialty saw/sander BH exhaust
007	Fuel system pneumatics BH exhaust
008	Forming bins BH exhaust
009	Hammermill BH exhaust
010	Fugitive (roads, piles, bins, bark hog, and debarker) (unregulated)
011	Thermal oil system ESP (bypass stacks) (NSPS)
012	Emergency Generator (unregulated)
013	Overlay Process (NESHAP)
014	Miscellaneous Coating Operations (edge seal, stencil, grade stamps) (NESHAP)

Proposed Project

The proposed project involves the installation of an inkjet printer as an alternative more efficient grade stamping mechanism for the surface of wood panels. This is in addition to the existing stamping (contact roller system) previously included in unregulated fugitive emissions unit (EU) 010. The existing stamping is now included in EU 014, because it is regulated as a Group 1 Miscellaneous Coating Operation according to 40 CFR 63 subpart DDDD, National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products (PCWP). (EU 014 was created in the Title V Air Operation Permit Revision No. 0770010-007-AV, which revised 0770010-003-AV). Group 1 Miscellaneous Coating Operations comply with the work practice requirements through the use of non-HAP coatings. The production capacity will not increase with the installation of the inkjet printer, only the means by which the ink is used and the variety of grade stamps available. The proposed inkjet printer will be located in the same area as the existing grade stamping. The project does not modify the edge seal and painting.

Although the G-P Hosford OSB Plant is a major source with respect to Prevention of Significant Deterioration (PSD), there is no change from "baseline emissions" to "projected emissions" from this project. The difference is thus less than the PSD significant emission rates. Based on the above information, this project is not subject to PSD review. [Rule 62-210.200(277); 62-210.200(191); 62-210.200 (32)(c); 62-212.400(2) F.A.C.]

This project will modify the following emissions units:

Facility ID No. 0770010	
ID No.	**Emission Unit Description**
014	Miscellaneous Coating Operations (edge seal, stencil, guide/nail lines, grade stamps)

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northwest District Air Resource Management Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 Governmental Center, Suite 308, Pensacola, Florida 32502-5794. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us and copied to the Northwest District Branch Office in Tallahassee at 630-3 Capital Circle NE, Tallahassee, FL 32301.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions;

   d. Appendix D. 40 CFR 63 Subpart DDDD (PCWP MACT); and

   e. Appendix E. 40 CFR 63 Subpart A (General Provisions)

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit revision is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit revision, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit 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 several pollutants. 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 five 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 within 60 days after the end of each calendar year during the five-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 as calculated 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.

For this project, the Department requires the annual reporting of actual VOC and HAPs emissions for the following units:

014	Miscellaneous Coating Operations (edge seal, stencil, guide/nail lines, grade stamps)

[Application 0770010-010-AC; Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

A. EU 014 Miscellaneous Coating Operations (inkjet printer addition)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
014	Miscellaneous Coating Operations (stencil, edge seal, guide/nail lines, grade stamp)
An inkjet printer is proposed to be added to this emissions unit as an alternative more efficient grade stamping mechanism for the surface of wood panels. This is in addition to the existing stamping (contact roller system) already included in emissions unit 014. There will be no stack. The proposed inkjet printer will be located in the same area as the existing grade stamping. The project does not modify the edge seal and painting. Group 1 Miscellaneous Coatings are subject to 40 CFR 63 subpart DDDD, National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products (PCWP) because it includes edge seals, stencils, and surface markings. The Group 1 Miscellaneous Coating Operations of EU 014 will continue to comply with the work practice requirements through the use of non-HAP coatings.	

EQUIPMENT

1. Inkjet Printer: The permittee is authorized to install the inkjet printer as described above. [Application No. 0770010-010-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum production rate of oriented strand board shall not exceed 600 million square feet based on a 3/8-inch thickness, per consecutive 12 month period. Records of production shall be made and maintained at the facility sufficient to demonstrate compliance with this limitation. [Rule 62-210.200(PTE), F.A.C.; permit 0770010-002-AC]

3. Restricted Operation: The hours of operation of the ink jet printer are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

4. Work Practice Requirements (for Group 1 Miscellaneous Coatings only):

   a. For Group 1 Miscellaneous Coating Operations, the owner or operator shall use only non-HAP coatings. Non-HAP coating means a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. [Table 3 of 40 CFR 63 subpart DDDD, 63.2241 (a) and 63.2292; Application No. 0770010-010-AC]

   b. As provided in 40 CFR 63.6(g), the EPA, may choose to grant the owner or operator permission to use an alternative to the work practice requirements. [40 CFR 63.2241(b)]

   c. The Group 1 Miscellaneous Coating Operations must comply with the work practice requirements upon initial startup. The owner or operator shall be in compliance with the work practice requirements at all times, except during times when the process unit(s) are not operating. [40 CFR 63.2233(a)(2) and 63.2250(a)]

INITIAL COMPLIANCE DEMONSTRATION

5. The owner or operator shall demonstrate initial compliance with the work practice requirement by:
   a. Using non-HAP coatings as defined above.
   b. Submitting a signed statement with the Notification of Compliance Status that the owner or operator is using non-HAP coatings
   c. Having a record showing that the owner or operator is using non-HAP coatings.

   [40 CFR 63.2260 (b), and Table 6 to subpart DDDD of part 63]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 014 Miscellaneous Coating Operations (inkjet printer addition)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
014	Miscellaneous Coating Operations (stencil, edge seal, guide/nail lines, grade stamp)
An inkjet printer is proposed to be added to this emissions unit as an alternative more efficient grade stamping mechanism for the surface of wood panels. This is in addition to the existing stamping (contact roller system) already included in emissions unit 014. There will be no stack. The proposed inkjet printer will be located in the same area as the existing grade stamping. The project does not modify the edge seal and painting. Group 1 Miscellaneous Coatings are subject to 40 CFR 63 subpart DDDD, National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products (PCWP) because it includes edge seals, stencils, and surface markings. The Group 1 Miscellaneous Coating Operations of EU 014 will continue to comply with the work practice requirements through the use of non-HAP coatings.	

EQUIPMENT

1. Inkjet Printer: The permittee is authorized to install the inkjet printer as described above. [Application No. 0770010-010-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum production rate of oriented strand board shall not exceed 600 million square feet based on a 3/8-inch thickness, per consecutive 12 month period. Records of production shall be made and maintained at the facility sufficient to demonstrate compliance with this limitation. [Rule 62-210.200(PTE), F.A.C.; permit 0770010-002-AC]

3. Restricted Operation: The hours of operation of the ink jet printer are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

4. Work Practice Requirements (for Group 1 Miscellaneous Coatings only):

   a. For Group 1 Miscellaneous Coating Operations, the owner or operator shall use only non-HAP coatings. Non-HAP coating means a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. [Table 3 of 40 CFR 63 subpart DDDD, 63.2241 (a) and 63.2292; Application No. 0770010-010-AC]

   b. As provided in 40 CFR 63.6(g), the EPA, may choose to grant the owner or operator permission to use an alternative to the work practice requirements. [40 CFR 63.2241(b)]

   c. The Group 1 Miscellaneous Coating Operations must comply with the work practice requirements upon initial startup. The owner or operator shall be in compliance the work practice requirements at all times, except during times when the process unit(s) are not operating. [40 CFR 63.2233(a)(2) and 63.2250(a)]

INITIAL COMPLIANCE DEMONSTRATION

5. The owner or operator shall demonstrate initial compliance with the work practice requirement by:
   a. Using non-HAP coatings as defined above.
   b. Submitting a signed statement with the Notification of Compliance Status that the owner or operator is using non-HAP coatings
   c. Having a record showing that the owner or operator is using non-HAP coatings.

   [40 CFR 63.2260 (b), and Table 6 to subpart DDDD of part 63]

CONTINUOUS COMPLIANCE

6. The owner or operator shall demonstrate continuous compliance by continuing to use non-HAP coatings and keeping records showing that he/she is using non-HAP coatings for Group 1 Miscellaneous Coating Operations. [40 CFR 63.2271 (a), and Table 8 to subpart DDDD of part 63]

7. The owner or operator shall report each instance in which he/she did not meet the work practice requirements for Group 1 Miscellaneous Coating Operations. [40 CFR 63.7721 (b)]

RECORDS AND REPORTS

8. Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), each compliance report must be submitted according to the following:

   a. The first compliance report must cover the period beginning on the compliance date that is specified in §63.2233 ending on June 30 or December 31, and lasting at least 6 months, but less than 12 months. For example, if the compliance date is March 1, then the first semiannual reporting period would begin on March 1 and end on December 31.

   b. The first compliance report must be postmarked or delivered no later than July 31 or January 31 for compliance periods ending on June 30 and December 31, respectively.

   c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

   d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively.

   e. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), the first and subsequent compliance reports may be submitted according to the dates the permitting authority has established instead of according to the dates above.

   [40 CFR 63.2281(b)]

9. The compliance report must contain the following information:

   a. Company name and address.

   b. 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.

   c. Date of report and beginning and ending dates of the reporting period.

   d. If there are no deviations from the work practice requirements in Table 8 of 40 CFR 63 subpart DDDD, a statement that there were no deviations from the work practice requirements during the reporting period.

   [40 CFR 63.2281(c)]

10. For each deviation from the work practice requirement that occurred, in addition to the requirements of specific condition A.12, the compliance report shall also contain the following information:

    a. The total operating time of each affected source during the reporting period.

    b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.2281 (d)]

11. The owner or operator shall report all deviations in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A). If the owner or operator submits a compliance report pursuant to the requirements of this subsection along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.2281 (g)]

12. The following records must be kept:

    a. A copy of each notification and report that was submitted to comply with subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv).

    b. Records required in Table 8 to subpart DDDD to show continuous compliance with each work practice requirement.

    [40 CFR 63.2282(a) & (b)]

13. Records must be in a form suitable and readily available for expeditious review as specified in §63.10(b)(1). Each record must be kept for five years (on site for at least two years) following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.2283 (a) & (b)]

GENERAL PROVISIONS

14. The Group 1 Miscellaneous Coating Operations are also subject to the applicable requirements in the Subpart A – General Provisions of 40 CFR 63. (See Appendix E. General Provisions - 40 CFR 63 subpart A, attached as part of the permit).

SECTION 4. APPENDICES

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. 40 CFR 63 Subpart DDDD (PCWP MACT); and

Appendix E. 40 CFR 63 Subpart A (General Provisions)

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number for that county

"001" identifies the specific permit project number

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor source federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act

CMS: continuous monitoring system

CO: carbon monoxide

CO_2: carbon dioxide

COMS: continuous opacity monitoring system

DARM: Division of Air Resource Management

DEP: Department of Environmental Protection

Department: Department of Environmental Protection

dscf: dry standard cubic feet

dscfm: dry standard cubic feet per minute

EPA: Environmental Protection Agency

ESP: electrostatic precipitator (control system for reducing particulate matter)

EU: emissions unit

F.A.C.: Florida Administrative Code

F.A.W.: Florida Administrative Weekly

F.D.: forced draft

F.S.: Florida Statutes

FGD: flue gas desulfurization

FGR: flue gas recirculation

Fl: fluoride

ft^2: square feet

ft^3: cubic feet

gpm: gallons per minute

gr: grains

HAP: hazardous air pollutant

Hg: mercury

I.D.: induced draft

ID: identification

kPa: kilopascals

lb: pound

MACT: maximum achievable technology

MMBtu: million British thermal units

MSDS: material safety data sheets

MW: megawatt

NESHAP: National Emissions Standards for Hazardous Air Pollutants

NO_X: nitrogen oxides

NSPS: New Source Performance Standards

O&M: operation and maintenance

O_2: oxygen

Pb: lead

PM: particulate matter

PM_{10}: particulate matter with a mean aerodynamic diameter of 10 microns or less

ppm: parts per million

ppmv: parts per million by volume

ppmvd: parts per million by volume, dry basis

QA: quality assurance

QC: quality control

PSD: prevention of significant deterioration

psi: pounds per square inch

PTE: potential to emit

RACT: reasonably available control technology

RATA: relative accuracy test audit

RBLC: EPA's RACT/BACT/LAER Clearinghouse

SAM: sulfuric acid mist

scf: standard cubic feet

scfm: standard cubic feet per minute

SIC: standard industrial classification code

SIP: State Implementation Plan

SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)

SO_2: sulfur dioxide

TPD: tons/day

TPH: tons per hour

TPY: tons per year

TRS: total reduced sulfur

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under conditions of the permit;

   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

   a. A description of and cause of noncompliance; and

   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

    a. Determination of Best Available Control Technology (not applicable);

    b. Determination of Prevention of Significant Deterioration (not applicable); and

    c. Compliance with New Source Performance Standards (not applicable).

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

        (a) The date, exact place, and time of sampling or measurements;

        (b) The person responsible for performing the sampling or measurements;

        (c) The dates analyses were performed;

        (d) The person responsible for performing the analyses;

        (e) The analytical techniques or methods used;

        (f) The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]

4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No additional control devices or systems are deemed necessary at this time. [Rule 62-296.320(1), F.A.C.]

7. 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. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

8. 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)1, F.A.C.]

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. 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 roads, parking areas, and yards.
    b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
    c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
    d. Removal of particulate matter from roads and other paved areas to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.

e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C. and Application No. 0770010-010-AC]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]

11. Emissions Computation and Reporting:

a. *Applicability.* This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

(1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

(a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.

(b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

(c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

(2) Continuous Emissions Monitoring System (CEMS).

(a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:

1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or

2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.

(b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:

1) A calibrated flow meter that records data on a continuous basis, if available; or

2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

(3) Mass Balance Calculations.

(a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:

1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.

(b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.

(c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(4) Emission Factors.

a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar,

but different, process.

(5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

(6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

(7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.

(8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

(1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:

a. All Title V sources.

b. All synthetic non-Title V sources.

c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.

d. All facilities for which an annual operating report is required by rule or permit.

(2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.

(3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.

(4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

(5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

ADDITIONAL CONDITIONS

12. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P. O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

13. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. An application for an operation permit shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days after initial operation. The permittee shall obtain an operating permit for this source before the expiration of the construction permit if the permittee desires to continue operation. [Rules 62.4-030, 62-4.050(3), 62-4.210(3), 62-4.220 and 62-210.300(1)(a) & (2), F.A.C.]

14. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports. [Rule 62-4.030, F.A.C.]

15. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 3, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

FINAL DETERMINATION

PERMITTEE

Georgia-Pacific Wood Products LLC
12995 Northeast State Road 65
Hosford, Florida 32334

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management Program
Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

PROJECT

Air Permit No. 0770010-010-AC
Title V Air Construction Permit
Hosford OSB

The proposed project involves the installation of an inkjet printer as an alternative more efficient grade stamping mechanism for the surface of wood panels.

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on July 7, 2010. The applicant published the Public Notice in the Calhoun-Liberty Journal on August 11, 2010. The Department received the proof of publication on August 19, 2010. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public or the EPA Region 4 Office. The Permittee requested deletion of obsolete conditions (requiring notifications that were previously submitted), and the permit was changed to accommodate that request. The changes were not considered significant enough to reissue the DRAFT Permit and require another Public Notice.

CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.

Memorandum

Florida Department of
Environmental Protection

To: Rick Bradburn, Air Program Administrator

Through: Armando Sarasua, Air Permitting Supervisor

From: Debbie Moore, Project Engineer

Date: August 25, 2010

Subject: Minor Source Air Construction Permit
Project No. 0770010-010-AC
Georgia-Pacific Wood Products LLC, Hosford OSB
Title V Air Construction Permit

The final permit for this project is attached for your approval and signature, which authorizes installation of an inkjet printer as an alternative more efficient grade stamping mechanism for the surface of wood panels. The work will be performed in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The project results in a Title V air construction permit and is not subject to PSD preconstruction review.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

DM/c

Curle, Mary Beth

From: Moore, Deborah L.
Sent: Tuesday, August 31, 2010 8:29 AM
To: 'Waikins, Kristine E.'
Cc: Sarasua, Armando; Curle, Mary Beth
Subject: RE: G-P Hosford -010
Attachments: DOC083110.pdf

Hi Kris,

I have attached a corrected page 7 for the ink jet construction permit -010-AC. Please replace this page. My apologies for the missing word. Thank you,

Debbie

Deborah Moore
Permit Engineer, Air Program, Northwest District
Florida Department of Environmental Protection
160 Governmental Center, Suite 308 Pensacola, Florida 32502-5794
850/595-0624; fax 850/595-8096 Deborah.L.Moore@dep.state.fl.us

Please Note: Florida has a very broad public records law. Most written communications to or from state officials are public records and may be made available to the public and/or media upon request. This e-mail communication may therefore be subject to public disclosure.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Waikins, Kristine E. [mailto:Kristine.Waikins@gapac.com]
Sent: Monday, August 30, 2010 8:22 AM
To: Moore, Deborah L.
Subject: G-P Hosford -010

Debbie,

Thank you so much for all of the permits going on at Hosford. I have a comment that I don't know how you want to handle about the Ink Jet construction permit -010. It is very minor but I did not get it to you before the final permit was issued.

Specific Condition 4.c, the "with" is missing from the line "shall be in compliance *with* the work practice requirements at all times..., "

Can you let me know how to handle this?

Kris Waikins
Georgia Pacific
Environmental Coordinator
Office (850) 379-4017

Cell (850) 228-1652
Fax (404) 654-1160
Email kristine.waikins@gapac.com