Georgia-Pacific Wood Products LLC

Georgia-Pacific Hosford OSB
12995 Highway 65 North
Hosford, FL 32334
Telephone: (850) 379-4000

April 8, 2010

RECEIVED
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NORTHWEST FLORIDA
DEP

CERTIFIED MAIL: 7006 2150 0004 0497 4632

Ms. Deborah Moore
Permit Engineer, Air Program, Northwest District
Florida Department of Environmental Protection
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

RE: Georgia-Pacific Wood Products LLC – Hosford, FL OSB
Facility ID: 0770010
Response to FDEP's Request for Additional Information dated January 8, 2010

Dear Ms. Moore:

This is in response to your January 8, 2010 Request for Additional Information (RAI) regarding the Georgia-Pacific Wood Products LLC (G-P), Hosford OSB application for an air construction permit, Florida Department of Environmental Protection (FDEP) file number 0770010-010-AC [EPSAP 2513-1], for the proposed addition of an inkjet printer to existing fugitive emissions for painting operations at the Hosford OSB facility in Liberty County. The January 8, 2010 RAI had a 90-day response timeframe. In reference to DEP Form No. 62-210.900(1), effective 3/16/08 and its instructions, the RAI requested the following items:

1. Section III, Subsection F1, PM – Total, Item 6: Provide the chapter, volume, section or table reference of AP-42 for the cited emission factor of 9.7 lbs/hr.
2. Section III, Subsection F1, PM – Total, Item 10: Provide a calculation for emissions of PM – Total.
3. Section III, Subsection F1, PM – Total, Items 3 and 11: Confine the potential emissions estimate in Item 3 to the emission unit addressed in this section of the application and revise Item 11 accordingly.
4. Section III, Subsection F1, HAPs and VOC, Items 2-11: Complete these items for HAPs and VOC pollutants.
5. Section III, Subsection G, Items 1-2: Cite the rule and basis for the proposed 5% opacity.

1. <u>Section III, Subsection F1, PM – Total, Item 6:</u>
The 9.7 lbs/hr of PM – Total is the total potential emissions from all of the fugitive emissions in EU010 (i.e., potential emissions from paint spraying, roads, debarker, hog, bins, and piles). The use of 9.7 lbs/hr as the emission factor for PM – Total is incorrect, since several emission factors were used for EU010 depending on the type of fugitive emission. In addition, based on an e-mail correspondence with Ms. Debbie Moore of FDEP on March 31, 2010, it was determined to add a new unregulated emissions unit (EU014) for the inkjet printer and all other painting operations,

regulated

and to only have the unregulated emissions unit EU010 cover fugitive emissions associated with roads, debarker, hog, bins, and piles. Therefore, G-P has revised and created EPSAP application 2513-2 to account for these EUs, and has added the emission factor references for both EUs.

As a result, the potential emissions for PM – Total for both EU010 and EU014 will change. The new EU010 emission calculations account for the increased PM – Total for paved roads that reflect current product density, and the new EU014 emission calculations account for the increased annual paint usage outside of the spray booth and the orders for an additional coating for a specialty OSB panel. All the coating continues to be done on existing equipment at this time. The installation of the new grade stamp inkjet printer will not increase annual coating usage, because it uses less ink per square foot for grade stamping.

G-P also respectfully requests that FDEP remove the following from EU010 in EPSAP application 2513-2, since these items no longer apply to EU010:

- Control Equipment/Method Name: "Mat or Panel Filter"
- SCC Code: 40200210 and 30701053
- Pollutant Codes: HAPS
- Allowable Emissions: We propose that there is no applicable limit for allowable emissions for this unit, because it is unregulated.
- Visible Emissions Information: We propose that there is no Visible Emission (VE) limit for this unit, because VE is only applicable for confined emissions of particulate matter, and because this unit is subject to Rule 62-296.320(4)(c)1., 3., and 4, F.A.C., (also see Section II, Facility-wide Conditions, permit condition #8 and Appendix TV-6, permit condition #57 in Hosford OSB's Title V Permit No. 0770010-003-AV).
- EU Additional Information: Attachment associated with "7. Other Information Required By Rule or Statute," since this attachment applies to EU014.

G-P has also updated the Hosford OSB Process Flow Diagram for the Former Press System to revise EU010 and include EU014 and has attached the revised process flow diagram to EPSAP 2513-2.

2. <u>Section III, Subsection F1, PM – Total, Item 10:</u>

As discussed above, emission calculations for EU014 will be added to determine the potential emissions from painting operations. Several types of painting operations occur inside the manufacturing building. We apply coatings in a dedicated booth with filter controls in line with the production process. The dedicated booth exhausts through a filter within the same building and has no roof penetration or additional confinement. The painting of Edge Seal coating on the edges of the OSB panels occurs inside the paint booth.

We also manually apply coatings on a batch basis outside the dedicated booth. These operations include painting the stencil logo on the outside of the OSB panels, painting nail/guide lines on certain product lines, painting Ultra Seal coating on certain product lines, and painting trademark

grade stamps using either rollers or the inkjet printer. These emission calculations are provided in an Excel spreadsheet that is attached to the EPSAP application 2513-2.

3. Section III, Subsection F1, PM – Total, Items 3 and 11:
As discussed above, the addition of a new EU014 will represent potential emissions of all painting operations subject to PCWP MACT Subpart DDDD, Group 1 Miscellaneous Coatings Work Practice, and EU010 will be revised to only cover fugitive emissions from roads, debarker, hog, bins, and piles. These revisions will be made to the EPSAP application 2513-2.

4. Section III, Subsection F1, HAPs and VOC, Items 2-11:
HAPs and VOC information is added for the new unregulated emissions unit EU014 in EPSAP application 2513-2 and emission calculations are provided in an Excel spreadsheet. EU014 is subject to PCWP MACT Subpart DDDD, Group 1 Miscellaneous Coatings Work Practice, which allows non-HAP coatings that are defined to have HAP content below 0.1% mass for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 % by mass for other HAP compounds.

5. Section III, Subsection G, Items 1-2:
We propose that there is no VE limit for this unit, because VE is only applicable for confined emissions of particulate matter and this unit only has fugitive emissions. This unit is also subject to Rule 62-296.320(4)(c)1., 3., and 4, F.A.C. (also see Section II, Facility-wide Conditions, permit condition #8 and Appendix TV-6, permit condition #57 in Hosford OSB's Title V Permit No. 0770010-003-AV), which regulate unconfined particulate matter.

We sincerely thank you for evaluating this response. If you have any questions, please contact Eric Chang at (404) 652-5203 or Kris Waikins at (850) 379-4017.

Certification by Responsible Official: *Based on information and belief formed after responsible inquiry, the statements and information in this document are true, accurate and complete.*

Sincerely,

Johnnie Temples
Plant Manager

Attachments

Cc: Kris Waikins/G-P Hosford OSB
Eric Chang/G-P Atlanta
Mark Aguilar, P.E./G-P Atlanta

Curle, Mary Beth

From: Chang, Eric K. [ERIC.CHANG@GAPAC.com]
Sent: Wednesday, April 07, 2010 5:09 PM
To: Moore, Deborah L.
Cc: Sarasua, Armando; Curle, Mary Beth
Subject: RE: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC response due 4/8/10

Hey Debbie,
Sorry about the late reply, but we will mail the response to you tomorrow and I will also send you an electronic copy.
Thank you,
Eric

Eric Chang, P.E.
Regional Environmental Manager
Georgia-Pacific Wood Products, LLC
133 Peachtree Street NE, 8th Floor
Atlanta, GA 30303
Office: (404) 652-5203
Cell: (404) 434-0360
Fax: (404) 654-1046
Eric.Chang@gapac.com

From: Moore, Deborah L. [mailto:Deborah.L.Moore@dep.state.fl.us]
Sent: Tuesday, April 06, 2010 3:51 PM
To: Chang, Eric K.
Cc: Sarasua, Armando; Curle, Mary Beth
Subject: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC response due 4/8/10

Eric,

I just wanted to remind you that the response for this RAI is due by Thursday, Apr. 8th. If you need assistance, please let me know.

Debbie.

Deborah Moore
Permit Engineer, Air Program, Northwest District
Florida Department of Environmental Protection
160 Governmental Center, Suite 308 Pensacola, Florida 32502-5794
850/595-8300 ext. 1230; 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.

From: Curle, Mary Beth
Sent: Friday, January 08, 2010 12:24 PM
To: jrtemple@gapac.com
Cc: eric.chang@gapac.com; mjaguila@gapac.com; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua,

Armando; Moore, Deborah L.
Subject: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC

Dear Sir/Madam:

Please send a reply message verifying receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

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Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. Thank you.

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Curle, Mary Beth

From: Moore, Deborah L.
Sent: Wednesday, March 31, 2010 1:42 PM
To: 'Chang, Eric K.'
Cc: Sarasua, Armando; Curle, Mary Beth
Subject: Georgia-Pacific Hosford OSB - Ink Jet Printer Project 0770010-010-AC - Creation of Separate EU for Painting

Hi Eric,

Yes, I received your question and have been working on getting an answer for you. As you have suggested, it would be best if you added a new EU for the inkjet printer. This new EU would be EU014 and would include the proposed inkjet printer along with the existing edge sealing, stenciling booth exhaust with dry filter that is included in EU010. So all that would be left in EU010 after creating EU014, would be the roads, debarker, hog, bins, and piles. However, for the emissions calculations use the current painting operations as the baseline to show the net increase with the addition of the inkjet printer. If you have any questions, please let me know.

Debbie

Deborah Moore
Permit Engineer, Air Program, Northwest District
Florida Department of Environmental Protection
160 Governmental Center, Suite 308 Pensacola, Florida 32502-5794
850/595-8300 ext. 1230; fax 850/595-8096 Deborah.L.Moore@dep.state.fl.us

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From: Chang, Eric K. [mailto:ERIC.CHANG@GAPAC.com]
Sent: Wednesday, March 31, 2010 9:07 AM
To: Moore, Deborah L.
Subject: RE: Georgia-Pacific Hosford OSB - Ink Jet Printer Project - Creation of Separate EU for Painting

Hi Debbie,
Just checking in with you to see if you received this and if I should simply add a new EU for the painting operations and revise EU010 in our EPSAP?
Thank you,
Eric

Moore, Deborah L.

From: Chang, Eric K. [ERIC.CHANG@GAPAC.com]
Sent: Monday, March 29, 2010 1:27 PM
To: Moore, Deborah L.
Subject: Georgia-Pacific Hosford OSB - Ink Jet Printer Project - Creation of Separate EU for Painting

Hey Debbie,
I remember discussing with you many moons ago about figuring out how to revise EU010 in Hosford's Title V permit (0770010-003-AV) during this Ink Jet Printer Construction Project (0770010-010-AC, EPSAP 2513-1) to solely address fugitive emissions from painting operations only (which includes Stencil, Edge Seal, Ultra Seal, Guide/Nail Lines, and Grade Stamps). The current EU010 also includes fugitives from roads, the debarker, bark hog, etc., which is how the original PSD was put together. I think we had agreed that the painting operations should be a separate EU, and EU010 would only contain the rest of the fugitive emissions. It would also be advantageous for the painting operations to be a separate EU, because PCWP MACT has a Work Practice Standard that applies to Group 1 Miscellaneous Coatings (40 CFR §63.2241, Table 3, Requirement (5)).

Therefore, if you agree that a separate painting operations EU should be created in the Title V Permit, how can the EPSAP be modified? Can I simply add a new EU in EPSAP 2513-1? Would EU010 remain "Fugitives from Roads, Debarker, etc." and the new EU (maybe call it EU014) be "Painting Operations?" We can also address your RAI questions at this time too.
Thanks for your help,
Eric

Eric Chang, P.E.
Regional Environmental Manager
Georgia-Pacific Wood Products, LLC
133 Peachtree Street NE, 8th Floor
Atlanta, GA 30303
Office: (404) 652-5203
Cell: (404) 434-0360
Fax: (404) 654-1046
Eric.Chang@gapac.com

Curle, Mary Beth

From: Temples, Johnnie R. [JRTemple@GAPAC.com]
Sent: Monday, January 25, 2010 3:37 PM
To: Curle, Mary Beth
Cc: Chang, Eric K.; Aguilar, Mark J.
Subject: RE: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC

This is confirmation that I received the e-mail and was able to open the attached document.

-----Original Message-----
From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Monday, January 25, 2010 2:40 PM
To: Temples, Johnnie R.
Cc: Chang, Eric K.; Aguilar, Mark J.
Subject: FW: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC

Please acknowledge receipt of the attached document. Thank you.

Mary Beth Curle
Administrative Assistant, Northwest District Air Program
850/595-8300 x 1220; fax 850/595-8096

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: Curle, Mary Beth
Sent: Friday, January 08, 2010 12:24 PM
To: 'jrtemple@gapac.com'
Cc: 'eric.chang@gapac.com'; 'mjaguila@gapac.com'; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando; Moore, Deborah L.
Subject: DEP Air Program Request for Additional Information; Georgia-Pacific 0770010-010-AC

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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

January 8, 2010

BY ELECTRONIC MAIL
jrtemple@gapac.com

Mr. Johnnie Temples
Plant Manager
Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Dear Mr. Temples:

This is to acknowledge receipt of your application for an air construction permit, DEP file number 0770010-010-AC [EPSAP 2513-1], for the proposed addition of an inkjet printer to existing fugitive emissions unit 010 (edge sealing, stenciling, booth exhaust with dry filter) at the Hosford OSB facility 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. Please provide the information listed below. Evaluation of your proposed project will be delayed until all requested information has been received. References made below to "Application" refer to DEP Form No. 62-210.900(1), Effective 3/16/08 and its instructions.

1. Application, Section III, Subsection F1, For PM – Total:
   a. Item 6 contains an incomplete reference to AP-42. Please provide the chapter, volume, section or table reference of AP-42 for the cited emission factor of 9.7 pounds per hour. Please note that AP-42 emissions factors are normally an emissions mass rate based on production or material usage or amount of fuel burned, not per unit time. Also see item 1.c below.
   b. Item 10 does not contain a calculation for the emissions. Show, in the space provided or as an attachment to the application form, the calculations made to determine the potential emissions and estimated fugitive emissions, as applicable. Document the source of any measured emission values or emissions factors used. Also, document any assumptions made regarding capture efficiency, control efficiency and any other relevant parameters used in the calculations. If necessary, attach additional sheets for more extensive calculations or to provide supporting documentation regarding any methods of calculation.

c. Items 3 and 11. Item 11 states the potential emissions estimate in Item 3 includes roads, paint, debarker, hog, bins and piles. Please confine the potential emissions estimate in Item 3 to the emission unit addressed in this section of the application.

2. Application, Section III. Subsection F1 is blank for HAPS and VOC. Please complete items 2 – 11 for these pollutants.

3. Application, Section III. Subsection G., Items 1 and 2 state an allowable opacity of 5% and a rule being the basis for the opacity. Please cite the rule and basis for the proposed 5% opacity.

The EPSAP application (number 2513-1) 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 Rule 62-4.05(3), F.A.C.

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-4.055(1), F.A.C.

If you have any questions, please contact Debbie Moore at 850/595-8300, extension 1230 or Deborah.L.Moore@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/dm/c

c: Eric Chang, Georgia-Pacific Wood Products LLC: eric.chang@gapac.com
Mark Aguilar, Georgia-Pacific Wood Products LLC: mjaguila@gapac.com
DEP Northwest District Branch Office, Tallahassee

Georgia-Pacific Wood Products, LLC
Hosford OSB Facility
Facility ID – 0770010
Construction Application # 2513-1
RE: Ink Jet Printer Construction Permit Application Rule Applicability

This rule applicability is in reference to the proposed construction and operation of an ink jet printer that is to be added to the current emission unit that is listed as E.U. ID No. 010 Fugitive (edge sealing/stenciling booth exhaust with dry filter) in Georgia-Pacific Hosford facility's Title V Air Operating Permit 0770010-003-AV. This printer will be added as an alternative grade stamping method to the current contact roller system. This emission unit is unregulated by the current Title V Air Operating permit but must comply with the work practice requirements of the *Plywood and Composite Wood Products (PCWP MACT), 40 CFR Part 63 Subpart DDDD,* standard.

The applicable work practice requirements are listed below in 40 CFR Part 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (PCWP MACT):

§63.2241 What are the work practice requirements and how must I meet them?

a) You must meet each work practice requirement in Table 3 in this subpart that applies to you.

The work practice requirements that are applicable to this construction are listed in Table 3 to Subpart DDDD of Part 63:

Table 3 to Subpart DDDD of Part 63 - Work Practices Requirements

(5) Group 1 miscellaneous coating operations - You must use non-HAP coatings as defined in §63.2292.

The definition of non-HAP coatings in §63.2292 is as follows:

§63.2292 What definitions apply to this subpart?

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.

In accordance with these work practices outlined above, the proposed grade stamping system will use only non-HAP coatings as defined. Included as an attachment to this permit application, is a sample of the non-HAP ink that will be used with this system.

Process Flow Diagram
Georgia-Pacific Wood Products, LLC
Hosford, FL
OSB Facility
Sheet 1 of 2

Ink Jet Printer Location
WELL PUMP HOUSE
WASTE DUMPSTER
LIME ROCK PILE
SCALE HOUSE
SHIPPING SLAB
SAW LINE AREA
WAREHOUSE AREA
PRESS/FORMING LINE AREA
BLENDING / DRY BIN AREA
THERMAL OIL
DRYER AREA
FLAKER AREA
DRYER RTO AREA
WASH AREA
PROPANE
FUEL TANKS
RR TIES
EMPLOYEE PARKING
POND "C"
POND "D"
POND "E"
POND "B"
FIREWATER PUMP BUILDING
FIREWATER POND
UTILITY SUB
RAILROAD SPUR
ROADWAY
A RELEASED FOR APPROVAL
NO. REVISIONS BY DATE APP'D BY
Georgia-Pacific WOOD PRODUCTS LLC
BUILDING PRODUCTS ENG
55 Park Place
ATLANTA, GA.
"Safety in Engineering, We Take It Seriously"
PLANT LOCATION: HOSFORD, FL OSB
SCALE: 1"=150 ft
DATE: 02/28/06
DRAWN BY: RPS
DRAWING NUMBER
342-165- C-011-01
SHEET: 1 of 1
REV. NO. A