## Curle, Mary Beth

**From:** Temples, Johnnie R. [JRTemple@GAPAC.com]
**Sent:** Thursday, July 08, 2010 3:47 PM
**To:** Curle, Mary Beth
**Cc:** Chang, Eric K.; Aguilar, Mark J.; forney.kathleen@epa.gov; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando; Moore, Deborah L.
**Subject:** RE: DEP Air Program Intent to Issue Permit 0770010-010-AC; Georgia-Pacific Wood Products LLC, Hosford OSB

I have received and was able to access.
Thank you,
Johnnie Temples

-----Original Message-----
**From:** Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
**Sent:** Wednesday, July 07, 2010 1:08 PM
**To:** Temples, Johnnie R.
**Cc:** Chang, Eric K.; Aguilar, Mark J.; forney.kathleen@epa.gov; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando; Moore, Deborah L.
**Subject:** DEP Air Program Intent to Issue Permit 0770010-010-AC; Georgia-Pacific Wood Products LLC, Hosford OSB

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.
The document may require action within a specified time frame. Please open and review as soon as possible.
The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
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FILE COPY

# 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

July 7, 2010

*By Electronic Mail, Received Receipt Requested*

Mr. Johnnie Temples
Plant Manager
Georgia-Pacific Wood Products LLC
12995 Northeast State Road 65
Hosford, Florida 32334

Re: Project No. 0770010-010-AC
Georgia Pacific Wood Products LLC, Hosford OSB
Title V Air Construction Permit
Addition of Inkjet Printer to EU014

Dear Mr. Temples:

On December 11, 2009, you submitted an application requesting the installation of an ink jet printer for grade stamping the surface of wood panels. This facility is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and, the Draft Permit and Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Deborah Moore, at 850/595-8300, extension 1230, or Deborah.L.Moore@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator
Northwest District Office

Enclosures

RB/dm/c

# WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an*
*Application for Air Permit by:*

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

Project No. 0770010-010-AC
Title V Air Construction Permit
Liberty County, Florida

*Authorized Representative:*
Mr. Johnnie Temples, Plant Manager

Hosford OSB
Ink jet printer addition to EU014

**Facility Location**: Georgia Pacific Wood Products LLC operates the existing Hosford OSB, which is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida.

**Project**: The applicant proposes to install an inkjet printer as an alternative method for grade stamping the surface of wood panels. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority**: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-212, and 62-213, of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical address and mailing address is: 160 Governmental Center, Suite 308, Pensacola, Florida 32502-5794. The Permitting Authority's telephone number is 850/595-8300.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S). Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit**: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice**: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051 of the Florida Statutes, to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available in this proceeding.

Executed in Pensacola, Florida.

Rick Bradburn
Air Program Administrator
Northwest District Office

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft 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 July 7, 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.

7/7/10

(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

Florida Department of Environmental Protection
Air Resource Section, Northwest District Office
Draft Minor Source Air Construction Permit
Project No. 0770010-010-AC
Georgia-Pacific Wood Products LLC, Hosford OSB
Liberty County, Florida

**Applicant**: The applicant for this project is Georgia-Pacific Wood Products LLC. The applicant's authorized representative and mailing address is: Johnnie Temples, Plant Manager, Georgia-Pacific Wood Products LLC P.O. Box 322, Hosford FL 32334.

**Facility Location**: Georgia-Pacific Wood Products LLC operates the existing Hosford OSB, which is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida.

**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 EU014, 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). (EU014 was created in the Title V Air Operation Permit Revision No. 0770010-007-AV, which revised 0770010-003-AV). EU014 complies with the Group 1 Miscellaneous Coating Operations 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.

**Permitting Authority**: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-212, and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical and mailing address is: 160 Governmental Center, Suite 308, Pensacola, Florida 32502-5794. The Permitting Authority's telephone number is 850/595-8300.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp.

**Notice of Intent to Issue Air Permit**: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the

Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available for this proceeding.

**(Public Notice to be Published in the Newspaper)**

# TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

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

Hosford OSB
Facility ID No. 0770010

## PROJECT

Project No. 0770010-010-AC
Application for Title V Air Construction Permit
Addition of Inkjet Printer to EU014

## COUNTY

Liberty County, Florida

## PERMITTING AUTHORITY

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

July 7, 2010

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Glossary of Common Terms

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

### Facility Description and Location

Georgia-Pacific Wood Products is an existing manufacturer of oriented strand board (OSB), which is categorized under Standard Industrial Classification Code No. 2493. The facility is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The UTM coordinates of the existing facility are Zone 16, 713.5 km East, and 3369.5 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

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 010. The existing stamping is now included in EU014, 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). (EU014 was created in the Title V Air Operation Permit Revision No. 0770010-007-AV, which revised 0770010-003-AV). EU014 complies with the Group 1 Miscellaneous Coating Operations 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.

### Processing Schedule

December 11, 2009 Received the application for a minor source air pollution construction permit.

| | |
|---|---|
| January 8, 2010 | Requested additional information |
| April 8, 2010 | Received additional information; application complete. |

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides ($NO_X$); sulfur dioxide ($SO_2$); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less ($PM_{10}$); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide ($H_2S$); total reduced sulfur (TRS), including $H_2S$; reduced sulfur compounds, including $H_2S$; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as $SO_2$ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

### PSD Applicability for Project

The construction of the inkjet printer for grade stamping is an alternative to an existing unit and will include no control mechanism. The mat or panel filter system in place is associated with the existing paint booth for the edge seal process. The inkjet printer will not increase production or emissions.

EU014 is subject to 40 CFR 63 subpart DDDD, National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products (PCWP) because this emissions unit includes edge seals, stencils, and surface markings. EU014 complies with the Group 1 Miscellaneous Coating Operations work practice requirements through the use of non-HAP coatings.

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

| Pollutant | Pre-Project Facility PTE (TPY) | Baseline/ Pre-Project Emissions EU-014 (TPY) | Post-Project Emissions EU-014 (TPY) | Project Emissions Increase (TPY) | Significant Emissions Rate (TPY) | Subject To PSD? |
|---|---|---|---|---|---|---|
| $PM/PM_{10}$ | 296.8/296.8 | 7.6 | 7.6/7.6 | 0 | 25/15 | No |
| VOC | 420.2 | 25 | 25 | 0 | 40 | No |
| HAPS (total) | >25 | 6 | 6 | 0 | N/A | No |

As shown in the above table, the facility is a major stationary source for PSD considerations, however, total project emissions increases will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

## 3. APPLICATION REVIEW

### Application Fee

This is an AC/1E (source greater than 5 tons per year but less than 25 tons per year) with no required permit fees. The facility is subject to annual emission fees as a Title V source

### Discussion of Emissions

Emissions from the inkjet printer will be uncontrolled. The installation of the inkjet printer will not change the production or emissions, only the means by which the ink is used and the variety of grade stamps available. Potential emissions of VOC for EU014 (which includes stencil, edge seal, guide/nail lines, grade stamp) are 25 tons per year. Potential emissions of particulate matter for EU014 are 7.6 tons per year. Potential emissions of total HAPs for EU014 are 6 tons per year.

### State Requirements

Rules 62-296.320 (2) and (4), F.A.C. Not more than 20% opacity and no objectionable odors.

**Federal NSPS Provisions:** None

**Federal NESHAP Provisions:** 40 CFR 63 subpart DDDD, Plywood and Composite Wood Products MACT

### Other Draft Permit Requirements

The maximum production rate of oriented strand board shall not exceed 600 million square feet on a 3/8-inch basis, per consecutive 12 month period. This emissions unit shall use only non-HAP coatings. Records must be kept and compliance reports submitted according to subpart DDDD.

## 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Deborah Moore is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the 850/595-8300 extension 1230 or Deborah.L.Moore@dep.state.fl.us.

# *** DRAFT PERMIT ***

*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:

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, (no changes / 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

(DRAFT)

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 _____ 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.

(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 (DRAFT)

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 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. The owner or operator shall submit all of the notifications in §63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified. [40 CFR 63.2280 (a)]

9. An Initial Notification shall be submitted no later than 120 calendar days after initial startup as specified in §63.9(b)(2). [40 CFR 63.2280 (b)]

10. A Notification of Compliance Status shall be submitted before the close of business on the 30th calendar day following the completion of the initial compliance demonstration as specified in §63.9(h)(2)(ii). A signed statement shall also be submitted with the Notification of Compliance Status that states non-HAP coatings are being used and records are being kept showing that non- HAP coatings are being used. [Table 6 of 40 CFR 63 subpart DDDD, and 40 CFR 63.2280(d)(1)]

11. 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)]

12. 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)]

13. 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)]

14. 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)]

15. 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)]

16. 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**

17. 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).