FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Georgia-Pacific Wood Products, LLC
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Hosford, Florida 32334

Authorized Representative:
Johnnie Temples, Plant Manager

Air Permit No. 0770010-016-AC
Permit Expires: November 4, 2016
Air Construction Permit Modification
Georgia-Pacific Wood Products
Reduction in Baghouse VE Frequency
Emission Unit Identification Corrections

PROJECT

This is the final air construction permit to modify Permit No. 0770010-002-AC (PSD-FL-282A). This revision implements the reduction in baghouse visible emissions observation frequency to Emission Units 003 through 009 from daily to weekly. This permit also correctly identifies emission units as indicated in the facility's current Title V Permit No. 0770010-012-AV.

The Hosford OSB Plant is categorized under Standard Industrial Classification No. 2493. The existing facility is located in Liberty County at 12995 Highway 65 North, Hosford, Florida. The UTM coordinates are Zone 16, 713.5 km East and 3369.5 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, the permit expiration date was changed to synchronize the timing of expiration with the facility's Title V renewal expiration date of November 4, 2016.

STATEMENT OF BASIS

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, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). 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. A copy of this permit revision shall be filed with the referenced permit and shall become part of the permit.

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 Tallahassee, Florida.

David L. Read, P.E.
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for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

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 the date indicated below to the following persons.

Johnnie Temples, Georgia-Pacific Wood Products, LLC: jrtemple@gapac.com
Armando Sarasua, DEP-Northwest District: armando.sarasua@dep.state.fl.us
Heather Ceron, U.S. EPA Region 4: ceron.heather@epa.gov
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Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

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.

Lynn Scearce
2013.05.16
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FACILITY DESCRIPTION

The existing OSB plant consists of the following emissions units and activities: furnish production; flake drying; forming and pressing; and finishing, in which the pressed mats are cut to size, cooled, and the edges are sprayed with a sealant to prevent swelling. Emissions of volatile organic compounds (VOC) from the dryers and panel press processes are controlled using natural gas-fired oxidizers. Multi-clones precede the oxidizers to remove particulate matter (PM). PM emissions from the material handling processes are controlled using baghouses. A thermal oil heater system is used to provide heat to the panel press and uses two heaters that fire wood and natural gas to indirectly heat the oil. PM emissions from the oil heaters are controlled by an electrostatic precipitator (ESP). The exhaust is then directed to the flake dryers to control VOC emissions with the oxidizer. When the flake dryers and oxidizer are aborted during operations, the exhaust may be directed straight to the atmosphere (ESP bypass stack) only if the natural gas oil heaters are in use or during the transition period of fuel switching from wood to natural gas. The facility has a maximum annual production rate of 600 million board feet based on a 3/8-inch thickness.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility operates a unit subject to the New Source Performance Standards (NSPS) of Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60).
- The facility operates units subject to the National Emission Standards of Hazardous Air Pollutants (NESHAP) of Title 40 of the Code of Federal Regulations, Part 63 (40 CFR 63).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, 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.

PROPOSED PROJECT

This final air construction permit revises Permit No. 0770010-002-AC (PSD-FL-282A) by reducing the baghouse visible emission observation frequency for Emission Units 003 through 009 at the Hosford OSB Plant. The facility is currently required to conduct daily visible emissions observations on seven baghouses (Emission Units 003 through 009) for reasonable assurance the facility is complying with Best Available Control Technology (BACT)/Maximum Achievable Control Technology (MACT) emission limits established in the referenced permit.

Georgia Pacific also wishes to correctly identify emission units (EU) as indicated in the facility's Title V Air Operation Permit No. 0770010-012-AV. The correction would properly identify the Thermal Oil System ESP as EU-011; Miscellaneous Coating Operations-stencil, edge and stamps as EU-014; and classify EU-010 as various Fugitive sources. Although, EU-014 as indicated in the current Title V Air Operation Permit No. 0770010-012-AV was previously permitted as part of EU-010 (Fugitives), which were unregulated emission units at the time PSD-FL-282A became final. The stenciling, edge sealing, ultra sealing, guide/nail lines, and grade stamps are now regulated as Group 1 Miscellaneous Coating Operations under 40 CFR 63 subpart DDDD. EU-014 was incorporated in permit No. 0770010-007-AC when subpart DDDD became applicable to the facility's coating operation and does not need to be singled out in the facility's PSD-FL-282A permit since the Miscellaneous Coating Operation rule was not promulgated at that time.

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. For ease of identification, all changes have been highlighted in yellow within this DRAFT permit document.

PERMIT BEING MODIFIED: PERMIT NO. 0770010-002-AC (PSD-FL-282A)

Affected Emissions Units: Seven Baghouse Exhaust (EU-003 through EU-009)

Section III. Subsection C, Specific Condition 6 and 7 is revised as follows.

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

6. ~~Daily~~ WeeklyVisual Observation Required: The owner or operator shall, at least once each ~~day~~ week, observe the emission points of emissions units 003 through ~~010~~ 009while these units are in operation, note whether visible emissions are observed or not and document corrective actions taken, to confirm that the visible emissions limit of condition 3 of this subsection is not exceeded. [Rule 62-4.070(3), F.A.C.]

   [Note: Method 9 observation is not required for compliance with this condition.]

REPORTING AND RECORD KEEPING REQUIREMENTS

7. Records of ~~Daily~~Weekly Visual Observations: The owner or operator shall make and maintain records of ~~daily~~ weekly visual observations required by condition 6 of this subsection.

Affected Emissions Units: Seven Baghouse Exhaust (EU-003 through EU-009)

Technical Evaluation and Best Available Control Technology (BACT)/Maximum Achievable Control Technology (MACT) Determination Section 9 is revised as follows.

9. COMPLIANCE

The compliance methods are detailed in Section III of the permit. Briefly, annual tests are required for the dryer and press RTOs. Monitoring and record keeping are required of operational parameters. Emission testing is required for the thermal oil system initially and upon renewal of each operation permit to provide information for estimating emissions. Compliance testing for the visible emission limitations for the dryers, press and thermal oil system is required on an annual basis. After initial particulate matter emission testing, further testing of the enclosed material handling emissions units is not required because an alternative limitation of 5% opacity is specified per Rule 62-297.620(4), F.A.C. Initial particulate matter emission testing of the spray booth (emissions unit ~~010~~014) is not required because of its low potential emissions. ~~Daily~~ Weekly visual observation of the material handling sources is required for periodic monitoring of the particulate matter control equipment.

Affected Emissions Units: Miscellaneous Fugitives (EU-010) and Thermal Oil System Electrostatic Precipitator Exhaust (EU-011)

Section I. FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY is revised as follows.

The applicant proposes to construct this new OSB manufacturing facility with the following emissions units:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Five flake dryers with two regenerative thermal oxidizers
002	Panel press with one regenerative thermal oxidizer/thermal catalytic oxidizer
003	Screen fines with saw trim transfer baghouse exhaust
004	Saw trim/finishing baghouse exhaust
005	Mat reject/flying saw baghouse exhaust
006	Specialty saw/sander baghouse exhaust
007	Fuel system pneumatics baghouse exhaust
008	Forming bins baghouse exhaust
009	Hammer mill baghouse exhaust
010	~~Thermal oil system electrostatic precipitator exhaust~~ Fugitives
011	Thermal oil system electrostatic precipitator exhaust

Fugitive sources of particulate matter are bark handling, wind erosion of bark stockpiles, drum debarkers, bark hog, and road traffic on paved and unpaved roads. These are subject only to the facility-wide specific conditions of this permit specified in Section II, including additional precautions to prevent emissions of unconfined particulate matter established as BACT.

Affected Emissions Unit: Thermal Oil System with ESP and bypass stack (EU-011)

Section III. Subsection D, Emission Unit Description is revised as follows.

The following specific conditions apply to the following emissions units after construction:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
~~010~~ 011	Thermal oil system with electrostatic precipitator (ESP) and bypass stack

Section III. Subsection D, Specific Condition 9 is revised as follows.

9. Pursuant to 60.48c Reporting and Record Keeping Requirements:

   (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by § 60.7 of this part. This notification shall include:

   (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

   (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

   (g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

   (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

   [Note: The only fuel authorized by this permit while emissions unit ~~010~~ 011 is subject to the NSPS requirements is natural gas. Records must be maintained for five years pursuant to the requirements for Title V facilities.]

Affected Emissions Units: Emission Units 001 through 014

Appendix B. BACT/MACT Determination Summary is revised as follows.

A complete discussion of the Department's technical evaluation and BACT/MACT determination is included in the document titled *Technical Evaluation and BACT/MACT Determination*. Following is a summary of the Department's control technology determinations pursuant to Rules 62-212.400, F.A.C., (BACT) and 62-204.800(10)(d)2, F.A.C., (case-by-case MACT)

SUMMARY OF BACT/MACT TECHNOLOGY DETERMINATIONS

Emissions Unit	**Pollutants**	**BACT/MACT Technologies**
001, Dryer	PM/PM_{10}, NOx, CO, VOC, VE	Multiclones and RTOs, 5% opacity
002, Panel Press	PM/PM_{10}, NOx, CO, VOC, VE	RTO, 5% opacity
003 – 009, Enclosed Material Handling	PM/PM_{10}, VE	Cyclone/baghouse, ~~dry filter system (010)~~, 5% opacity
010, Fugitive Emissions	PM/PM_{10} and VOC	Reasonable precautions to prevent emissions of unconfined particulate matter and VOC, dry filter system
~~010~~ 011, Thermal Oil System	PM/PM_{10}, VE	Use of natural gas when exhausts directly to atmosphere. Exhaust directed to dryers when firing wood. 5% opacity

Note: Emissions units 001 and 002 are subject to BACT and MACT. The other emissions units and the fugitive emissions are subject to BACT.

The allowable emission limits associated with the BACT/MACT technologies and related compliance requirements are shown in Section III of the permit.