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PERMITTEE

Georgia-Pacific Wood Products LLC
223 Gordon Chapel Road
Hawthorne, FL 32640

Authorized Representative:
Ms. Teresa Davidson, Plant Manager

Air Permit No. 1070015-024-AC
Permit Expires: October 31, 2013
Issue Date: DRAFT
Plywood Manufacturing Plant
ARMS ID No. 1070015
Three Veneer Dryers Steam Coil
Replacement Project

PROJECT AND LOCATION

Georgia-Pacific Wood Products LLC proposes extensive replacement of the steam coils on dryer nos. 1, 2 and 3 to improve the efficiency of the veneer drying operation. The proposed work will be conducted at the Plywood/Composite Wood Products Plant in Hawthorne, FL. The facility is designated Standard Industrial Classification No. 2436. This existing facility is located at 223 Gordon Chapel Road, Hawthorne, Putnam County, FL; UTM Coordinates: Zone 17, 399.50 km East and 3273.80 km North; Latitude: 29° 35′ 30″ North and Longitude: 82° 02′ 15″ West.

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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. 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.

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Executed in Jacksonville, Florida

DRAFT

_____ _____

Christopher L. Kirts, P.E. Date
District Air Program Administrator

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)

SUBSECTION A. FACILITY DESCRIPTION

The mill produces plywood and is categorized under the North American Industries Classification System (NAICS) code 321113 for Softwood Veneer & Plywood, Softwood Sawmill. The facility consists of three plywood veneer dryers, three presses, a wood-fired boiler that generates steam for use in the dryers, presses, and associated materials handling equipment.

Logs and glue are the primary raw materials used in the plywood panel production. The production process is composed of four principal manufacturing sub-processes:

1. The green end, which includes log handling, debarking, cutting, soaking vats, veneer lathes, and green veneer handling.
2. Veneer drying.
3. Glue line and pressing.
4. Finishing, which includes sawing, sanding, edge sealing, and shipping.

Logs are transported to the plant and temporarily stored in the log yard or wet deck. The logs are placed on the unscramble deck. From the unscramble deck, the logs are conveyed to the debarker, which removes the bark from the logs. Bark is conveyed to a hog for processing, and is stored under cover for shipment offsite, or to the boiler fuel house. The debarked logs are conveyed to the slasher saw. This saw cuts the logs into approximately 8.5 foot long sections called blocks. The blocks are then conveyed to the steaming vats, where they are soaked to condition them for peeling in the lathes.

The drying process consists of veneer dryers indirectly heated by steam from the boiler, and mechanical systems for moving the veneer through the dryers and onto the stacking bins. The exhaust gases from the hot zones of the dryers are directed to a regenerative thermal oxidizer (RTO) to destroy volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) released from the wood veneer.

Periodically market conditions may cause the mill to produce final panels with dry veneer manufactured at another facility. Dry veneer is conveyed to one of two glue lines for assembly into panels. Whole veneer sheets are placed on a conveyor, sprayed with glue, and alternated with core material to form panels. Panels are sent to a pre-press in a stack, followed by individual panel pressing in one of three presses, where the glue is thermally activated.

Pressed panels are trimmed to final size at the panel saw. Some panels are further processed by the tongue and groove machine, specialty saw, or the sander. Wood residuals are collected at various points during the production process and are either shipped offsite or stored in bins for use as fuel in the wood-fired boiler. Finished panels are stacked; some receive treatment with end and/or edge seals, oil, or logo and product information. The panels are then stored in the warehouse before being shipped offsite.

The existing facility consists of the following emissions units.

E.U. ID No.	Brief Description
001	Wood Fired Boiler
002	Skinner Saw System & Glue Line System

E.U. ID No.	Brief Description
003	Sanding System
005	Nos. 1, 2, and 3 Veneer Dryers
007	Group 1 miscellaneous coating operations
---	Miscellaneous insignificant EUs and activities

The proposed project will affect the following emissions unit(s).

E.U. ID No.	Brief Description
001	Wood Fired Boiler
002	Skinner Saw System & Glue Line System
003	Sanding System
005	Nos. 1,2, and 3 Veneer Dryers
007	Group 1 miscellaneous coating operations
---	Miscellaneous affected insignificant EUs and activities

PROJECT DESCRIPTION

The existing three plywood dryers (Emission Unit No. 005) have a nominal rated production capacity of 50.4 thousand square feet per hour of 3/8" plywood board, based on a monthly average. Georgia-Pacific Wood Products LLC proposes extensive replacement of the steam coils on dryer nos. 1, 2 and 3 to improve the efficiency of the veneer drying operation. Many of the existing coils have reached the end of their useful life. The coil replacement project is not intended or expected to result in an increase in pollutant emissions or production capacity.

Pursuant to Rule 62-212.400, F.A.C., Georgia-Pacific Wood Products LLC provided information to show that the project will not result in an exceedance of the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the draft permit requires Georgia-Pacific Wood Products LLC to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate 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(PSD), F.A.C.

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is 904/256-1700.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. The Compliance Authority's telephone number is 904/256-1700.

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. Common Testing Requirements

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 is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the replacement equipment. To apply for a Title V Air Operation Permit, 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 and Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions unit(s).

E.U. ID No.	Brief Description
001	Wood Fired Boiler
002	Skinner Saw System & Glue Line System
003	Sanding System
005	Nos. 1,2, and 3 Veneer Dryers
007	Group 1 miscellaneous coating operations
---	*Miscellaneous affected insignificant EUs and activities*

Emission Unit Nos. 001, 002, 003, and 007, and *Miscellaneous affected insignificant EUs and activities* are listed here because they may be affected by the changes made to EU No. 005 (installation of replacement steam coils). The EUs (other than EU No. 005) themselves will not be modified.

EU No. 005 -- Three indirect-heated Veneer Board Dryers dry the green veneer using the steam generated by the wood fired boiler. The dryers remove excess moisture from veneer by conveying the veneer through a heated medium, generally on rollers, belts, cables, or wire mesh. Softwood veneer dryers are used to dry veneer with greater than or equal to 30 percent softwood species on an annual volume basis. Volatile Organic Compounds (VOC) emissions from the three hot zones of the dryers are conveyed to a Regenerative Thermal Oxidation (RTO) unit for destruction.

The emissions unit is subject to the following regulation(s):

40 CFR 63 Subpart DDDD-National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products adopted and incorporated by reference in Rule 62-204.800, F.A.C.

PROPOSED WORK

1. Nos. 1, 2, and 3 Veneer Dryers (EU No. 005): The permittee is authorized to conduct this project on the wood veneer dryers as follows:
   - Replace approximately 50% of the steam coils on dryer No. 1;
   - Replace approximately 30% of the steam coils on dryer No. 2;
   - Replace approximately 66% of the steam coils on dryer No. 3;
   - Replacement of any appurtenances associated with the replacement steam coils necessary for their proper operation

   [Application No. 1070015-024-AC]

PERFORMANCE RESTRICTIONS

2. Capacities and Fuels: The proposed work shall not result in an increase in the wood veneer dryers' maximum annual capacity. [Rule 62-4.070(3), F.A.C. and Application No. 1070015-024-AC]

TESTING REQUIREMENTS

3. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and the project 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 5 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 5-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.

   d. For this project, the following are the estimated baseline actual emissions: PM -- 240.22 tons/year; PM_{10} -- 174.45 tons/year; $PM_{2.5}$ -- 161.02 tons/yr; SO_2 -- 17.65 tons/year; NO_x -- 188.52 tons/year; CO -- 406.19 tons/year; VOC -- 232.9 tons/year; and Pb -- 0.03 tons/year.

   e. For this project, the following are the estimated maximum projected actual emissions: PM -- 253.66 tons/year; PM_{10} -- 183.59 tons/year; $PM_{2.5}$ -- 168.52 tons/yr; SO_2 -- 18.67 tons/year; NO_x -- 210.48 tons/year; CO -- 424.64 tons/year; VOC -- 243.64 tons/year; and Pb -- 0.03 tons/year.

f. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual emissions for the affected EUs and activities:

   a. Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions as used in the application to establish baseline emissions.

   b. As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Application No. 1070015-024-AC; Rules 62-212.300(1)(e), and 62-210.370, F.A.C.]

APPLICABILITY OF PREVIOUS PERMITS

4. Existing Permits and Regulations: The conditions of this permit temporarily supplements all other previously issued air construction and operation permits for this emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The Permittee shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

[Rule 62-4.070, F.A.C.]