PERMITTEE

Georgia-Pacific Wood Products LLC
Hawthorne Plywood Plant
223 Gordon Chapel Road
Hawthorne, Florida 32640

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256-7590

PROJECT

Project No. 1070015-025-AC
Application for Air Construction Permit

Georgia-Pacific Wood Products LLC, Hawthorne Plywood Plant is an existing facility that 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.

The facility is located in Putnam County at 223 Gordon Chapel Rd, Hawthorne, Florida.

On May 13, 2011, the Department received an application to 1) construct a 475.56 ton per hour maximum design capacity ring debarker as the replacement of the existing 416.25 tons per hour maximum design capacity ring debarker operating as the South Debarker; 2) reduce operation of the existing North Debarker (416.25 tons per hour maximum design capacity) to only as a backup unit during times when maintenance is being performed on the new South Debarker; 3) add a new hydraulic power unit and process controls for the existing gang/slasher saws; and 4) upgrade the log soaking/steaming vat in-feed system used to transfer the cut-to-length logs (blocks) into the existing log soaking/steaming vats.

Pursuant to Rule 62-212.400, F.A.C., Georgia-Pacific Wood Products LLC provided information to show that the project will not exceed 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.

NOTICE AND PUBLICATION

The Department distributed a draft construction permit package on August 12, 2011. The applicant submitted comments on the draft construction permit package on August 16, 17, and 22, 2011. The

Department changed the draft construction permit based on the submitted comments. On September 6, 2011, the Department withdrew the draft construction permit documents dated August 12, 2011 and replaced them with a new draft construction permit package. The applicant published the Public Notice in The Palatka Daily News on September 23, 2011. The Department received the proof of publication on October 6, 2011. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

Public

No comments on the Draft Permit were received from the public.

Applicant

On August 16, 2011, the Department received a comment from applicant. The following summarizes the comment and the Department's response.

Ms. Maria Zufall noted that there appeared to by a typo in Specific Condition No. 5.e. for the future actual VOC emissions. The value should be 50.65 tons per year instead of the stated 45.27 tons per year.

Response: The Department is agreement with the comment. The recommended changes are noted below. ~~Strikethrough~~ indicates deleted text; double-underline indicates added text.

5. Actual Emissions Reporting: This permit is based on a hybrid test analysis that compared baseline actual emissions with projected actual emissions for existing units and potential emissions for new units**.** 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 – 63.37 tons/year; PM_{10} – 39.20 tons/year; $PM_{2.5}$ – 33.67 tons/yr; SO_2 -- 17.62 tons/year; NO_x – 178.52 tons/year; CO – 352.33 tons/year; VOC – 45.27 tons/year; and Pb -- 0.03 tons/year.

e. For this project, the following are the estimated maximum projected actual emissions: PM – 81.79 tons/year; PM_{10} – 47.88 tons/year; $PM_{2.5}$ – 41.65 tons/yr; SO_2 – 18.42 tons/year; NO_x – 188.38 tons/year; CO – 364.4 tons/year; VOC - ~~45.27~~ 50.65 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:

   1. The Permittee shall us the actual, annual veneer dryer throughput (thousand square feet of 3/8" plywood board), and the actual annual quantity (tons) of logs debarked in the North and South Debarkers, as applicable to determine the actual annual emissions for the affected emissions units and sources of this project.
   2. 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.
   3. 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. 1070015-025-AC; Rule 62-212.300(1)(e),F.A.C.; and Rule 62-210.370, F.A.C.]

On August 17, 2011, the Department received an updated project description from the applicant that explains that the North debarker may be used at the same time as the new South Debarker if the slasher saw is not operational. The following summarizes the Department's response.

Ms. Maria Zufall noted that the North Debarker may also be used when the Slasher Saws are down as the debarker is also capable of cutting the logs to length.

Response: The recommended changes are noted below. ~~Strikethrough~~ indicates deleted text; double-underline indicates added text.

Project Description in the Written Notice of Intent to Issue Air Permit:

Georgia-Pacific Wood Products LLC proposes replace the existing South debarker with a new debarker of increased capacity. The existing North debarker will be maintained onsite and operated ~~only~~ as a backup debarking unit to the new South debarker during times when maintenance is being performed on the South debarker. The North debarker may also be operated when the existing slasher saws are not in operation/down as the Debarkers are also capable of cutting logs to length. ~~At no time will the~~

~~two debarkers operate simultaneously.~~

Project Description in the Public Notice:

Project: Georgia-Pacific Wood Products LLC proposes to replace the existing South debarker with a new debarker of increased capacity. The existing North debarker will be maintained onsite and operated ~~only~~ as a backup debarking unit to the new South debarker during times when maintenance is being performed on the South debarker. The North debarker may also be operated when the existing slasher saws are not in operation/down as the Debarkers are also capable of cutting logs to length. Georgia-Pacific Wood Products LLC proposes to also add a new hydraulic power unit and process controls for the existing gang/slasher saws, as well as upgrade the log soaking/steaming vat infeed system used to transfer the cut-to-length logs (blocks) into the existing log soaking/steaming vats.

Project Description in the Technical Evaluation and Preliminary Determination

The existing North and South ring debarkers (Emission Unit No. 009) have a physical short-term and long-term design capacity of 416.25 tons/hr and 3,646,363 tons/yr, respectively. The percentage of operating time of the two debarkers is approximately 25/75, respectively. To improve the uptime of the debarking operations and reduce maintenance costs, the facility proposes to replace the South debarker with a new debarker of increased design capacity (475.56 tons/hr and 4,165,871 tons/yr). At present, the facility is unable to process this quantity of logs due to the veneer dryers' (EU 005) annual production limitation. The total combined throughput of the new South debarker and the existing North debarker combined shall not exceed the tons of logs required per thousand square feet (Msf) of plywood produced (3/8" basis), i.e., shall not exceed the maximum log throughput of 1,011,044 tons per year.

The facility proposes to restrict the operation of the existing North debarker, as a debarking unit, to a backup unit when maintenance is being performed on the new South debarker. The facility may operate the North debarker when the slasher saws are not in operation/are down as the Debarkers are also capable of cutting logs to length. ~~At no time shall the North and South debarkers be operated simultaneously.~~

Technical Evaluation and Preliminary Determination- FDEP Review

Therefore, the Department review confirms that operating conditions for the Debarkers are required to insure that a significant increase in emissions after completion of the project does not occur. The following additional conditions are necessary to provide reasonable assurance of compliance with applicable regulations:

b. North Debarker: Upon completion of the installation of the new South Debarker and ~~prior to~~ after initial operation, the Permittee shall restrict operation of the North Debarker, as a debarking unit, to only during times of maintenance of the South Debarker. In this mode of operation, t~~T~~he North Debarker shall be restricted to back up operation only. The facility may operate the North debarker when the slasher saws are not in operation/are down as the Debarkers are also capable of cutting logs to length. ~~At no time shall the North Debarker operate simultaneously with the South Debarker.~~

Draft Construction Permit

Project Descriptions (pages 1 and 4):

This air construction permit authorizes Georgia-Pacific Wood Products LLC to 1) construct a 475.56 ton per hour maximum design capacity ring debarker as the replacement of the existing 416.25 tons per hour maximum design capacity ring debarker operating as the South Debarker; 2) reduce operation of the existing North Debarker (416.25 tons per hour maximum design capacity), as a debarking unit, ~~to only as a backup unit during~~ times when maintenance is being performed on the new South Debarker; 3) add a new hydraulic power unit and process controls for the existing gang/slasher saws; and 4) upgrade the log soaking/steaming vat in-feed system used to transfer the cut-to-length logs (blocks) into the existing log soaking/steaming vats. 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.

The facility proposes to restrict the operation of the existing North Debarker, ~~to only~~ as a backup debarking unit, to times when maintenance is being performed on the new South debarker. The North debarker may also be operated when the existing slasher saws are not in operation or are down as the Debarkers are also capable of cutting logs to length. ~~At no time shall the North and South Debarkers be operated simultaneously~~.

Specific Condition No. 3.b.

3. Method of Operation:

   a. South Debarker: Upon completion of the installation of the new South Debarker, its hours of operation shall not be limited (i.e., 8760 hours per year).

   b. North Debarker: Upon completion of the installation of the new South Debarker and ~~prior to~~ after initial operation, the Permittee shall restrict operation of the North Debarker, as a debarking unit, to ~~only~~ during times of maintenance of the South Debarker. In this mode of operation, t~~T~~he North Debarker shall be restricted to back up operation only. The facility may operate the North debarker when the slasher saws are not in operation/are down as the Debarkers are also capable of cutting logs to length. ~~At no time shall the North Debarker operate simultaneously with the South Debarker.~~

   [Rule 62-4.070(3), F.A.C.; Rule 62-212.300, F.A.C.; Rule 62-212.400(12), F.A.C.; and Rule 62-210.200(PTE), F.A.C.]

On August 22, 2011, the Department received comments from the applicant. The following summarizes the comment and the Department's response.

Ms. Maria Zufall the following:

- The facility is currently not set up to track the log throughput for the North and South debarker separately. Can Condition 4a be changed to track the total tons of logs debarked instead of for each debarker?

- The facility is currently not set up to track the hours of operation for the debarker. GP requests that Condition 4b be removed. The hours of operation influence the hourly emissions, but not the annual emissions which are determined by log throughput.

Response: The Department required the tracking of the hours of operation of the two debarkers because it was stated that the North Debarker would only operate as a back up to the new South Debarker in the original application. This has since been revised with the August 17, 2011 comment/revised project description submittal. The recommended changes are noted below. ~~Strikethrough~~ indicates deleted text; double-underline indicates added text.

Technical Evaluation and Preliminary Determination- FDEP Review

Therefore, the Department review confirms that operating conditions for the Debarkers are required to insure that a significant increase in emissions after completion of the project does not occur. The following additional conditions are necessary to provide reasonable assurance of compliance with applicable regulations:

c. Log Throughput- Recordkeeping: The Permittee shall maintain records of the actual quantity (tons) of logs debarked in ~~each of~~ the North and South Debarkers on at least a calendar month basis. The Permittee shall determine a rolling, consecutive 12-month total from the monthly data. These records shall be kept onsite and available to Department personnel upon request.

d. ~~Hours of Operation- Recordkeeping: The hours of operation of each of the North and South Debarker shall be recorded and maintained.~~

Draft Construction Permit

Specific Condition No. 4:

4. North and South Debarkers – Log Throughput:

   ~~a. Log Throughput:~~ The Permittee shall maintain records of the actual quantity (tons) of logs debarked in ~~each of~~ the North and South Debarkers on at least a calendar month basis. The Permittee shall determine a rolling, consecutive 12-month total from the monthly data. These records shall be kept onsite and available to Department personnel upon request.

   ~~b. Hours of Operation: The hours of operation of each of the North and South Debarker shall be recorded and maintained.~~

   [Rule 62-4.070(3), F.A.C.]

CONCLUSION

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