Appendix RM

Routine Control Unit Maintenance Exemption

Georgia-Pacific

Georgia-Pacific Wood Products LLC
Structural Panels

223 Gordon Chapel Road
Hawthorne, FL 32640
(352) 481-4311
(352) 481-4915 fax

August 30, 2007

via **CERTIFIED MAIL/RETURN RECEIPT:**
7003 3110 0002 9443 9756

Mr. Christopher L. Kirts, P.E.
District Air Program Administrator
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

RE: Georgia Pacific Wood Products LLC—Hawthorne Plywood Plant
Title V Permit Number 1070015-AV
National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products - 40 CFR Part 63.2251 - Routine Control Device Maintenance Exemption (RCDME)

Dear Mr. Kirts:

Consistent with the Subpart DDDD provisions allowing a facility to request a routine control device maintenance exemption (RCDME) in recognition of the level of maintenance required by MACT control devices, attached for your review and approval is the RCDME request for the Georgia-Pacific Wood Products LLC, Hawthorne, Florida, Plywood Facility.

Thank you for your consideration of our request. If you have any further questions, please contact Sam Barket at 352-481-4311.

Sincerely,

Leon Pimner
Plant Manager

cc: P. Vasquez
Enclosure

ROUTINE CONTROL DEVICE MAINTENANCE EXEMPTION (RCDME) – 40 CFR63.2251

Georgia-Pacific Wood Products LLC – Hawthorne, Florida, Plywood Facility

Routine Control Device Maintenance Exemption

40 CFR Par 63 Subpart DDDD provides for the request and approval of a routine control device maintenance exemption (RCDME) in recognition of the level of maintenance required by MACT control devices. The RCDME details are described below:

- The exemption must not exceed annual process operating uptime percentages specified for differing process units:
    - 0.5 percent of the uptime for RTO/RCO controlling veneer dryers emissions and hot presses,
    - 3 percent of the uptime for RTO controlling emissions from OSB flake dryers.
- The compliance options and operating requirements do not apply during times when control device maintenance covered under the routine control device maintenance exemption is performed.
- Emissions must be minimized to the greatest extent possible during these times.
- To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is shut down.

Normal Process Shutdown Schedule

The facility normally schedules at least one major shutdown during a holiday period lasting 2 to 3 days duration July 4th and Thanksgiving.

One veneer dryer is normally shut down on a rotating basis for a period of 8-hours once per week for routine preventive maintenance and cleaning. The other veneer dryers remain operational during this period.

Maintenance Exemption-Related Activities

Safety checks, preventative maintenance, and internal inspections are required by insurance underwriters, recommended by RTO/RCO manufacturers, and indicated as necessary based on operational experience. Bakeouts, washouts, replacement of media, and replacement/repair of corroded parts will depend on particulate loading to the system, frequency of maintenance activates, age of the equipment, etc.

Particulate that penetrates deeper into the media bed will tend to burn off. However, chemically reactive particles can cause problems even when they penetrate deep into the media. A portion of the particulate that enters the RTO/RCO will collect on the cold face of the media bed. Depending on the design of the media, the particulate build up can rapidly lead to plugging of the media bed. Plugging causes several significant problems. Blocking airflow results in a rise in pressure drop, forcing the induced draft fan to work harder and consume more electricity. The only remediation solution for these symptoms is wash-out or bake-out of the media bed. The frequency of wash-out and bake-out procedures typically increase until the only viable solution is a complete

media change out. Based on our historical experience with these systems, we intend to implement the following schedule to insure proper operation of the control device:

SOFTWOOD VENEER DRYER – HOT ZONES / RTO-RCO SYSTEM

Maintenance Activity	Frequency	Reason
Safety Checks	Quarterly	A safety check is recommended by the RTO/RCO manufacturer (quarterly) and by Factory Mutual (annual). This activity requires approximately 15 minutes of RTO/RCO downtime to conduct.
Preventive Maintenance and Internal Inspection	Annual	An annual safety check is recommended by the RTO/RCO manufacturer, by Factory Mutual (annual), and based on company's operating experience. This activity involves checking various components – i.e., valves, structure, burners, natural gas train, etc. This activity requires approximately 48 hours including cool-down and heat-up. However, issues like media replacement, replacement of corroded components, metal support structure repair or replacement, etc., may take more than 48 hours.
Bakeout	As needed by observed build up.	The facility may perform routine bakeouts of the RTO-RCO, as indicated by buildup of material on the media. A bakeout operation holds the RTO/RCO chamber in outlet mode and raises the temperature of the cold face to 800°F. The bakeout is required to remove organic materials from the chamber and typically lasts approximately 24 to 30 hours, including cool-down and heat-up of the unit.
Washout	As needed by observed build up.	The facility may perform routine washouts of the RTO/RCO, as indicated by buildup of material on the media. A washout is conducted at ambient condition and is required to remove inorganic and burned out materials accumulated in the bed saddles or media. A washout typically lasts 24 hours including cool-down and heat-up of the unit.
Catalytic Media Sampling	Once per year	PCWP MACT requires sampling of catalytic media to check the activity level. This activity requires 24 hours to conduct, including cool-down and heat-up of the unit.
Media Replacement	Every 7 years for	Replacement of standard media in

	standard media and 3 years for catalytic media.	RTO/RCO controlling veneer dryer emissions is anticipated every 7 years. Catalytic media will be about 3 years. Removal of old media and placement of the new media may take up to 72 hours.
Replacement/Repair of Corroded Parts	Once per year	Natural Gas train, valve and regulator tend to corrode due to moisture in the natural gas pipeline and/or exposure to the whether. Visual inspections of the natural gas distribution system are conducted every year and addressed during the annual Preventive Maintenance and Internal Inspection described above.

Quarterly safety checks are of very short duration and will be scheduled to coincide with the weekly veneer dryer preventative maintenance period in order to minimize emissions during the RTO/RCO outage. The annual preventive maintenance and internal inspection and catalytic media sampling (if applicable) will be scheduled to coincide with a major holiday process shutdown in order to minimize emissions. Should additional activities requiring RTO/RCO outage beyond the duration of the annual process shutdown be indicated including bakeout, washout, media replacement, and/or replacement/repair of corroded parts, these will be conducted as RCDME activities in order to minimize emissions that would occur as a result of the need for a subsequent, separate outage. RCDME outages will be tracked in order to assure that they do not exceed the allowed 0.5% of annual process unit operating uptime.