DRAFT/PROPOSED Title V Air Operation Permit Renewal
Permit No. 1070015-027-AV

APPLICANT

The applicant for this project is Georgia-Pacific Wood Products, LLC. The applicant's responsible official and mailing address are: Mr. Len Springs, Plant Manager, Georgia-Pacific Wood Products, LLC Hawthorne Plant, 600 Georgia-Pacific Blvd, Prosperity, South Carolina 29127.

FACILITY DESCRIPTION

The applicant operates the Hawthorne Plywood Plant, which is located at 223 Gordon Chapel Road (South of SR 20), Hawthorne, Florida.

Georgia-Pacific Wood Products, LLC Hawthorne plant is a Plywood/Particle Board Plant 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.

PROJECT DESCRIPTION

The purpose of this permit is to renew Title V Air Operation Permit No. 1070015-022-AV. In addition this permit includes the incorporation of the applicable terms and conditions of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters for the existing wood-fired boiler (EU 001) at the facility.

The wood-fired boiler (EU 001) manufactured by Zurn Industries burns unadulterated green wood, wood residuals collected at various points during the production process, dry wood material (small pieces of dry wood, sawdust and fines), and small amounts of on-specification used oil generated onsite through maintenance activities (up to 6,000 gallons per year). The wood-fired boiler provides steam for use in the dryers, presses, and associated materials handling equipment for heating various processes. The wood-fired boiler is equipped with a two multi-cyclone ash re-injection systems and an Electro-Static Precipitator (ESP) (Manufacturer: PPC Industries, Model: 20R –1330-3712S) for the control of particular matter emissions.

Florida Administrative Code (F.A.C.) Requirements

The wood-fired boiler is subject to Florida Administrative Code (F.A.C.) Rule 62-296.410 for Carbonaceous Fuel Burning Equipment.
Permit No. 1070015-023-AC issued February 18, 2010 authorized the burning of on-specification used oil generated onsite through maintenance activities (up to 6,000 gallons per year)in the wood-fired boiler.

40 CFR 64 - Compliance Assurance Monitoring (CAM)

The wood-fired boiler is subject to Compliance assurance monitoring (CAM) to ensure compliance with a PM limit of 0.10 lb/MMbtu.

Federal NSPS Provisions

The wood fired boiler is not subject to NSPS Subpart Db since it was constructed prior to the applicability date. Based on the application for renewal received September 9, 2014 no modification has been made to the unit since the initial construction.

Federal NESHAP Provisions

On June 19, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the standards of 40 CFR 63, Subpart DDDDD (Boiler MACT) as a result of the boiler MACT removal TV Operation Permit Revision No. 1070015-019-AV issued March 11, 2008 authorized the removal of 40 CFR 63, Subpart DDDDD (Boiler MACT).

On March 21, 2011, EPA promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This final rule became effective on May 20, 2011.

On May 18, 2011, EPA published a notice delaying the effective dates of the March 21, 2011 final rule until such time as judicial review is no longer pending or until EPA completes its reconsideration of the rules, whichever is earlier.

On December 23, 2011, EPA published the reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters).

On January 9, 2012, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating and remanding the EPA May 18, 2011delay notice. As such, the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters is now effective. The EPA finalized the reconsideration by publication in the Federal Register on January 31, 2013 as a result the wood-fired boiler (EU001) is now subject to 40 CFR 63, Subpart DDDDD (Boiler MACT).

In accordance with 40 CFR 63.7495(b), the compliance date for existing sources is January 31, 2016.

Unregulated and Insignificant Emissions Units and/or Activities:

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received September 9, 2014
Notice of Intent to Issue Air Permit issued **[Month day, year]**
Public Notice Published **[Month day, year]**

EPA 45 day review period began **xx/xx/2014**, ran concurrently with the Public Notice period, and concludes on **xx/xx/2014**.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is/ a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to emissions Unit at the facility.

Emissions unit 001 Wood-fired Boiler is subject to CAM for the regulated emissions of particulate matter, which are controlled by an ESP.

Emissions unit 005 is subject to CAM for the regulated emissions of VOCs which are controlled by a Regenerative Thermal Oxidation (RTO).

GHG: Based on the title V Air Operation Permit Renewal application received September 9, 2014, the facility total CO_2e emissions are 10,607 tons/yr. The facility has the potential to emit less than 100,000 TPY of CO_2e emissions, and is therefore not a major source of Greenhouse Gases based on EPA's 2010 Gas Tailoring Rule.

PROJECT REVIEW

Changes that were made as part of permit renewal No. 1070015-027-AV include: the Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide Conditions are revised to reflect the changes to the statutes that went into effect for year 2014, and the Prevention of Accidental Releases Facility-wide condition is revised to reflect the correct reporting agency. Addition of the 195HP diesel fired emergency generator as a regulated emissions unit. Addition of 40 CFR 63 Subpart DDDDD and Subpart ZZZZ standards to the subsections of the permit.

TITLE V PERMIT FORMAT CHANGES:

Title V Permit format effective 10/28/2010

Replacement of TV-6 with Appendix TV – Title V General Conditions dated 02/16/2012,

Appendix TR – Facility-Wide Testing Requirements dated 9/12/2008

Appendix RR- Facility-wide Reporting Requirements dated 1/13/2014

Appendix NESHAP, Part 63 Subpart A was updated

Appendix NESHAP, Part 63, Subpart DDDDD was added

Appendix NESHAP, Part 63, Subpart ZZZZ was added

CONCLUSION

Based on the information received from the facility on September 9, 2014 the Georgia Pacific Hawthorne Plant has been in "idle" mode from September 20, 2011. Based on Rule 62-210.300 Permits Required:

Air Operation Permits. 62-210.300(2)(a)3.b.:

"b. Except as provided in sub-subparagraph 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:

(I) The owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and

(II) The owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and

(III) The emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

In accordance with Rule 62-210.300(2)(a)3.b. renewal permits are not to extend 5-years from the date of the shutdown (9-20-16). This allow the permit renewal to extend for 17 months. Permit No. 1070015-027-AV Renewal will be issued for a period not to exceed 17 months

This project renews Title V air operation permit No. 1070015-022-AV, which was issued on April 22, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.