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Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

April 30, 2012

*By Electronic Mail, Received Receipt Requested*
jrtemple@gapac.com

Mr. Johnnie Temples
Plant Manager
Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Dear Mr. Temples:

This is in response to your April 24, 2012 letter requesting a language change to the description of the Low Density Forming and Advanced Process Control Software project in air construction permit 0770010-013-AC for the Hosford OSB facility in Liberty County. According to the letter, you wish to clarify changes to the design of the surface forming rolls.

You do not need Department approval to change the surface forming rolls design, because it does not appear from the letter that the change would increase emissions.

This determination may be revoked if the installation is substantially modified or the basis presented for this determination is found to be materially incorrect.

If you have any questions, please contact Armando Sarasua at 850/595-0639 or e-mail armando.sarasua@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/as/c
Enclosure
c: Eric Chang, Georgia-Pacific Atlanta: eric.chang@gapac.com
Madison McNealy, Georgia-Pacific Hosford: madison.mcnealey@gapac.com
DEP Northwest District Branch Office, Tallahassee

## NOTICE OF RIGHTS

Persons whose substantial interests are affected by this agency action have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the Department's Northwest District Office, 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address and telephone number of each petitioner; the county in which the subject matter or activity is located;

(b) A statement of how and when each petitioner received notice of the agency action;

(c) A statement of how each petitioner's substantial interests are affected by the agency action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the agency action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the agency action;

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the agency action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency action have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

## Curle, Mary Beth

**From:** Temples, Johnnie R. [JRTemple@GAPAC.com]
**Sent:** Monday, April 30, 2012 1:33 PM
**To:** Curle, Mary Beth
**Cc:** Chang, Eric K.; McNealey, Madison; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando
**Subject:** RE: DEP Air Program response; Georgia-Pacific 0770010-013-AC surface forming rolls design clarification

I have received and reviewed.
Thank you,
Johnnie Temples

---

**From:** Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
**Sent:** Monday, April 30, 2012 9:09 AM
**To:** Temples, Johnnie R.
**Cc:** Chang, Eric K.; McNealey, Madison; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando
**Subject:** DEP Air Program response; Georgia-Pacific 0770010-013-AC surface forming rolls design clarification

Dear Sir/Madam:

Please verify receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send." Your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

The document may require action within a specified time frame. Please open and review as soon as possible.

The document is in "pdf" format. Adobe Acrobat Reader can be downloaded for free at: http://www.adobe.com/products/acrobat/readstep.html. When printing the document, select "Document and comments" from the "Print What:" menu item; if this is not done the signature may not appear on the printed document. Please advise this office of any changes to your e-mail address. Thank you.

*Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.*

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.*

**Georgia-Pacific Wood Products LLC**

*Georgia-Pacific Hosford OSB*
*12995 Highway 65 North.*
*Hosford, FL 32334*
*Telephone 850-379-4000*

4/25/12

April 24, 2012

Certified Mail: 7008 2810 0000 9991 6637

RECEIVED
APR 25 2012
NORTHWEST FLORIDA
DEP

Mr. Armando Sarasua, P.E.
Air Permitting Manager
Florida Department of Environmental Protection
Northwest District Office
160 Government Center, Suite 308
Pensacola, FL 32502-5794

RE: Georgia-Pacific Wood Products LLC - Hosford OSB Plant
Facility ID # 0770010
Title V Permit 0770010-012-AV
**Change to the Description of Modifications Proposed in the Application for Permit 0770070-013-AC**

To Mr. Armando Sarasua:

This letter is regarding the Construction Permit Application that the Georgia-Pacific Wood Products LLC, Hosford OSB Facility (G-P) submitted to the Florida Department of Environmental Protection on September 6, 2011 concerning the Low Density Forming and Advanced Process Control Software proposed modifications. G-P would like to add the additional language shown in **bold underline** to the original proposed modifications below.

*Low Density Forming – Resinated strands are metered out of the distribution bins and into the orienting heads that place them onto the continuous 8-foot wide forming line. The layers are oriented to form a continuous mat. After all layers have been formed, the continuous mat is trimmed to 8 feet wide by 24 feet long sections which are loaded into the press, where under heat and pressure the formed mat is compressed to form the OSB.*

*The low density forming project will involve replacing the existing core* ***and surface*** *forming rolls with a*

*different design roll which will allow for more efficient orientation of the flakes. In addition to the replacement core formers, a laser profiler will be used to detect changes in the mat height and*
*relay information back to the control room operator for optimizing the core forming operations via the air profiling equipment. The air profiling equipment will allow the flakes to be positioned at the most efficient locations across the mat width.*

*The proposed mat forming modifications are projected to result in a 4-5% reduction in the amount of raw materials required to produce the same quantity of board that can currently be produced with this same amount of raw material. The proposed mat forming project does not change the current capability of the press to compress the formed mats into the OSB panel since no changes are being made to the press. As such, the short term production rate (and associated emissions) is not expected to change as a result of the proposed forming equipment modifications. However, actual annual production could potentially increase given that the potential exists to utilize this additional raw material gained to manufacture more OSB over the long term. This project is being implemented as a means of reducing production costs through the reduction in the amount of raw material required per unit of production, not as a means of producing more OSB, especially given the current economic climate and market conditions for our product.*

Replacing the surface forming rolls will allow for improved orientation of the flakes on the surface layer of the panel. This will not increase the 4-5% reduction in raw materials that was initially determined in the permit application. G-P respectfully requests written permission from FDEP to proceed with this additional modification. Should you have any questions regarding this request, please contact Madison McNealey, Hosford OSB Facility Environmental Coordinator at (850) 379-4038.

***Certification by Responsible Official:*** *Based on information and belief formed after responsible inquiry, the statements and information in this document are true, accurate and complete.*

Sincerely,

Johnnie Temples
Plant Manager

cc: Tom Mosher
Cliff Bowling

## Curle, Mary Beth

**From:** Temples, Johnnie R. [JRTemple@GAPAC.com]
**Sent:** Tuesday, March 20, 2012 1:58 PM
**To:** Curle, Mary Beth
**Cc:** McNealey, Madison; Chang, Eric K.
**Subject:** RE: DEP Air Program changes to Permit 0770010-013-AC; Georgia-Pacific Wood Products

I have received the e-mail.
Thanks

---

**From:** Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
**Sent:** Tuesday, March 20, 2012 7:57 AM
**To:** Temples, Johnnie R.
**Cc:** McNealey, Madison; Chang, Eric K.
**Subject:** RE: DEP Air Program changes to Permit 0770010-013-AC; Georgia-Pacific Wood Products

Please acknowledge receipt of the attached document. Thank you.

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.*
**From:** Curle, Mary Beth
**Sent:** Thursday, March 08, 2012 2:18 PM
**To:** 'jrtemple@gapac.com'
**Cc:** 'eric.chang@gapac.com'; 'madison.mcnealey@gapac.com'; Castellano, Marlane; White, Tracy A.; Bradburn, Rick; Sarasua, Armando; Melton, Carol; Jackson, Angelia
**Subject:** DEP Air Program changes to Permit 0770010-013-AC; Georgia-Pacific Wood Products

Dear Sir/Madam:

Please send a reply message verifying receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send." We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

The document may require action within a specified time frame. Please open and review as soon as possible.

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Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. Thank you.

*Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.*

FILE COPY

Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 8, 2012

*By Electronic Mail, Received Receipt Requested*
jrtemple@gapac.com

Mr. Johnnie Temples
Plant Manager
Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Dear Mr. Temples:

This is in response to your letter dated December 20, 2011 regarding comments on draft permit 0770010-013-AC for the Hosford OSB facility in Liberty County. As indicated in an e-mail to Mr. Eric Chang on December 21, 2011, the Department issued the final construction permit prior to receiving the hard-copy comments.

According to your letter, "A description of the proposed project should be updated to reflect that as part of the Low Density Forming/Advanced Process Control Software project, Hosford plans to add a board scale and mechanical thickness gauge to the line after pressing. These scales will enable the site to quantify the weight and thickness of each board as a means to assess the effectiveness of low density forming and to control board quality. This measurement tool will not change the production increase contained in the permit application." The project description has been updated in construction permit 0770010-013-AC, along with changes to Section 2. Administrative Requirements, 9.a. We have enclosed updated pages of the permit and the updated Technical Evaluation and Permit Determination.

Permit 0770010-013-AC Appendices (Section 4. Appendix C; Common Conditions 14) states the following: *The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. An application for an operation permit shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days after initial operation.*

Initial operation is defined as the initial startup of the emissions unit. According to 40 CFR 60 Subpart A - Startup is defined as *the setting in operation of an affected facility for any purpose*. Therefore the application is due within 75 days after the initial startup of the unit.

If you have any questions, please contact Angelia Jackson at 850/595-0598 or e-mail angelia.jackson@dep.state.fl.us

Sincerely,

Rick Bradburn
Air Program Administrator

RB/aj/c

Enclosures
c: Eric Chang, Georgia-Pacific Atlanta: eric.chang@gapac.com
Madison McNealy, Georgia-Pacific Hosford: madison.mcnealey@gapac.com
DEP Northwest District Branch Office, Tallahassee

## NOTICE OF RIGHTS

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The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the county in which the subject matter or activity is located;

(b) A statement of how and when each petitioner received notice of the agency action;

(c) A statement of how each petitioner's substantial interests are affected by the agency action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the agency action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the agency action;

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the agency action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency action have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

## FACILITY AND PROJECT DESCRIPTION

### Existing Facility

The facility is currently operating under the Title V operating permit 0770010-012-AV, effective November 4, 2011.

This Oriented Strand Board (OSB) facility consists of four principal manufacturing processes: (1) furnish production, which includes debarking, slashing, and flaking; (2) flake drying; (3) forming and pressing; and (4) finishing, which consists of trimming (sawing), sanding and edge sealing. The facility has a maximum annual production rate of 600 million board-feet based on a 3/8-inch thickness.

In addition to the main production activities, there are a number of activities that support the main operation of the facility, including storage tanks for wax and fuels, facility roads, and internal combustion engines (ICE) associated with emergency equipment.

| **Facility ID No. 0770010** | |
|---|---|
| **ID No.** | **Emission Unit Description** |
| 001 | Five Flake Dryers with two RTOs |
| 002 | Panel Press with one RTO/TCO/RCO |
| 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 |
| 011 | Thermal oil system ESP (bypass stacks) |
| 012 | Emergency Generator (1314 hp) and Fire Pump Engine (218 hp) (work practice requirements for pump engine beginning May 3, 2013) |
| 013 | Overlay process |
| 014 | Miscellaneous Coating Operations (edge seal, stencil, grade stamps) |
| *Unregulated Emissions Units and Activities* | |
| 010 | Fugitives (roads, piles, bins, bark hog and debarker) |

### Proposed Project

This proposed project will modify the forming equipment that is used to form the mat which is subsequently pressed to form the OSB. The proposed low density forming project will involve replacing the existing core forming rolls with a different design roll which will allow for more efficient orientation of the flakes. In addition to the replacement core formers, a laser profiler will be used to detect changes in the mat height and relay information back to the control room operator for optimizing the core forming operations via the air profiling equipment. The air profiling equipment will allow the flakes to be positioned at the most efficient locations across the mat width. The facility also proposes to install a board scale and thickness measurement system after the press and proposes to install advanced process control (APC) software to allow for more efficient control of process parameters within the drying process. No physical changes to any equipment in the drying process will result from the APC software installation.

operation. To apply for a Title V 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 Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and 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 five 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 ten-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.

   For this project, the Department requires the annual reporting of actual CO, PM10, PM2.5 and VOC emissions for the following units:

| E.U. ID No. | Brief Description |
|---|---|
| 001 | Five Flake Dryers with two RTOs |
| 002 | Panel Press with one RTO/TCO/RCO |
| 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 |
| 014 | Miscellaneous Coating Operations (edge seal, stencil, grade stamps) |
| Unregulated Emissions Units | |
| 010 | Fugitives (roads, piles, bins, bark hog, and debarker) |

   [Rules 62-212.300(1)(e) and 62-210.370, F.A.C.; Application 0770010-013-AC]

# TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

Georgia-Pacific Wood Products LLC
12995 Northeast State Road 65
Hosford, Florida 32334

Hosford OSB
Facility ID No. 0770010

## PROJECT

Project No. 0770010-013-AC
Application for Air Construction Permit
Low Density Forming on Press &
Advanced Process Control Software for Dryers

## COUNTY

Liberty, Florida

## PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northwest District Office
160 W. Government Street, Room 308
Pensacola, Florida 32502-5740

November 28, 2011

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### Facility Description and Location

Georgia-Pacific Wood Products LLC is an existing oriented strand board manufacturing facility, which is categorized under Standard Industrial Classification Code No. 2493, Reconstituted Wood Products. The facility is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The UTM coordinates of the existing facility are Zone 16, 713.5 km East, and 3369.5 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

This proposed project will modify the forming equipment that is used to form the mat which is subsequently pressed to form the Oriented Strand Board (OSB). The proposed low density forming project will involve replacing the existing core forming rolls with a different design roll which will allow for more efficient orientation of the flakes. In addition to the replacement core formers, a laser profiler will be used to detect changes in the mat height and relay information back to the control room operator for optimizing the core forming operations via the air profiling equipment. The air profiling equipment will allow the flakes to be positioned at the most efficient locations across the mat width. The facility also proposes to install a board scale and thickness measurement system after the press and to install advanced process control (APC) software to allow for more efficient control of process parameters within the drying process. No physical changes to any equipment in the drying process will result from the APC software installation.

Neither the proposed Low Density Forming modifications nor the APC software installation will require a change in the emission limits or the permitted production capacity (600 million square feet (MMSF) on a 3/8-inch thickness basis) of the facility.

**Processing Schedule**

September 8, 2011 received the application for a minor source air pollution construction permit.

## 2. PSD APPLICABILITY

**General PSD Applicability**

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides ($NO_X$); sulfur dioxide ($SO_2$); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less ($PM_{10}$); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide ($H_2S$); total reduced sulfur (TRS), including $H_2S$; reduced sulfur compounds, including $H_2S$; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as $SO_2$ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

**PSD Applicability for Project**

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is a Major Facility with respect to Prevention of Significant Deterioration (PSD) per Rule 62-212.400.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

| Pollutant (TPY) | Potential Emissions 600 MMSFY | Baseline Actual Emissions (BAE) 501.3 MMSFY | Projected Actual Emissions (PAE) 525 MMSFY | Emissions Increase | Significant Emissions Rate | Subject to PSD |
|---|---|---|---|---|---|---|
| CO | 436.3 | 91.8 | 124.9 | 33.1 | 100 | NO |
| $NO_X$ | 449.6 | 191.2 | 200.5 | 9.3 | 40 | NO |
| PM | 296.8 | 132.6 | 140.4 | 7.8 | 25 | NO |
| $PM_{10}$ | 296.8 | 118.6 | 125.8 | 7.2 | 15 | NO |
| $PM_{2.5}$ | | 116.6 | 123.6 | 7.1 | 10 | NO |
| $SO_2$ | | 16.4 | 16.7 | 0.3 | 40 | NO |
| VOC | 420.2 | 130.8 | 151.9 | 0.6 | 40 | NO |
| Pb | | 0.032 | 0.032 | 0.0006 | 0.6 | NO |
| GHG | | 20,703 | 21,254 | 550 | 75,000 | NO |
| $CO_2e$ | | 23,509 | 24,115 | 606 | 75,000 | NO |

*The GHG and CO2e values do not include biogenic sources of these pollutants.*

As shown in the above table, this project is not a major modification under PSD regulations, since the differences between the baseline actual emissions including consideration of demand growth and projected actual emissions do not reach or exceed the significant emissions thresholds.

## 3. APPLICATION REVIEW

### Application Fee

This is a Title V facility and is exempt from permitting fees. The facility is subject to annual emission fees as a Title V source.

### Discussion of Emissions

Post-project emissions for all affected emissions units will be monitored annually for ten years after permit issuance. The annual emission report will compare the actual emissions to the post-project projections and provide an explanation for any emissions that exceed the post-project projections. In the event that actual post-project emissions indicate that the PSD trigger levels have been exceeded, all provisions in Rule 62-212.400 will apply as if the permit had never been issued.

Neither the proposed Low Density Forming modifications nor the APC software installation will require a change in the emission limits or the permitted production capacity (600 million square feet (MMSF) on a 3/8-inch thickness basis) of the facility. These proposed modifications also will not require any changes to current monitoring, recordkeeping or reporting activities contained the Title V permit for the facility. The project emissions increase of CO, NOx, PM, PM10, $PM_{2.5}$, SO2 and VOC is 33, 9.3, 7.8, 7.2, 7.1, 0.3 and 0.6 tons per year, respectively. The emission increases are less than the corresponding significant emission rates for these air pollutants that would trigger PSD review and BACT determinations.

**State Requirements**

Initial PM and VE tests. Rules 62-210.300(1), 62-210.370, 212.300(1)(e), 62-213 and 62-212.400(12), F.A.C.

**Federal NSPS Provisions**

All NSPS provisions remain the same as contained in the existing Title V permits. No new NSPS requirements are triggered as a result of this project.

**Federal NESHAP Provisions**

All NESHAP provisions remain the same as contained in the existing Title V permits. There are no new Federal NESHAP provisions applicable to this project.

**Other Draft Permit Requirements**

Permittee shall maintain and submit to the Department on an annual basis for a period of 5 years from the effective date of this permit, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., that the project did not result in emissions increases of any regulated pollutant for each emission unit affected by this project above the projected emission increase included with the application. For any emissions that exceed the projected emission increase, an explanation will be provided and if the increase in emissions is such that a PSD trigger level is exceeded, Rule 62-212.400(1)-(12) shall apply.

## 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Angelia Jackson is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at 850/595-0598 or Angelia.Jackson@dep.state.fl.us.

## Curle, Mary Beth

**From:** Jackson, Angelia
**Sent:** Wednesday, December 21, 2011 3:32 PM
**To:** 'Chang, Eric K.'
**Cc:** Sarasua, Armando; Curle, Mary Beth; McNealey, Madison; Temples, Johnnie R.; Bowling, Cliff; Aguilar, Mark J.
**Subject:** RE: Georgia-Pacific 0770010-013-AC comments

Eric,

Thanks for the phone call today regarding the comments to the recently issued Georgia Pacific construction permit (0770010-013-AC). Unfortunately, we issued the final permit prior to receiving your phone call and the hard-copy. We will review the administrative changes you noted, and contact you if any additional information is needed.

Thanks,

Angelia Jackson
Air Permitting Section
850-595-0598

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.*
**From:** Chang, Eric K. [mailto:ERIC.CHANG@GAPAC.com]
**Sent:** Wednesday, December 21, 2011 2:42 PM
**To:** Curle, Mary Beth; Sarasua, Armando; Jackson, Angelia
**Cc:** McNealey, Madison; Temples, Johnnie R.; Bowling, Cliff; Aguilar, Mark J.
**Subject:** Comments for HOS Draft Constr Permit LDI-Aspentech Georgia-Pacific 0770010-013-AC
**Importance:** High

Hey Angelia,
Per my phone call, we had overnighted our comments yesterday, but unfortunately, y'all may not have received them before you issued the final construction permit. Therefore, I've enclosed the scanned version with this e-mail, and hopefully, we can still get our comments incorporated. We really appreciate y'all taking the time for this, and please give me a call if you have any questions. You can call my cell phone at (404) 434-0360, or my office tomorrow at (404) 652-5203.
Thanks!
Eric

**Georgia-Pacific Wood Products LLC**

*Georgia-Pacific Hosford OSB*
*12995 Highway 65 North.*
*Hosford, FL 32334*
*Telephone 850-379-4000*

December 20, 2011

Fed Ex Tracking#: 793035527090

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NORTHWEST FLORIDA
DEP
12/21/11

Mr. Armando Sarasua, P.E.
Air Permitting Manager
Florida Department of Environmental Protection
Northwest District Office
160 Government Center, Suite 308
Pensacola, FL 32502-5794

RE: Georgia-Pacific Wood Products LLC - Hosford OSB Plant
Facility ID # 0770010
Title V Permit 0770010-012-AV
**Comments on Draft Permit 0770070-013-AC**

Dear Mr. Sarasua:

Georgia-Pacific Wood Products LLC, Hosford OSB Facility (G-P) respectively submits the following comments on the above referenced draft permit issued by the Florida Department of Environmental Protection (FDEP). The comments are provided in the sequence that they appear in the technical evaluation and the permit. Additional text is shown in ***bold italic*** and text to delete is shown as ~~strike through~~.

G-P would appreciate the opportunity to receive and review a pre-final version reflecting any changes made to the draft permit before the permit is finalized.

G-P appreciates your consideration of these comments. Should you have any questions regarding this notification, please contact Eric Chang, Regional Environmental Manager, at (404) 652-5203, or Madison McNealey, Hosford OSB Facility Environmental Coordinator at (850) 379-4038.

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***Certification by Responsible Official:*** *Based on information and belief formed after responsible inquiry, the statements and information in this document are true, accurate and complete.*

Sincerely,

Johnnie Temples
Plant Manager

cc: Eric Chang/GP Atlanta

**Comments on Technical Evaluation and Draft Air Permit #0770070-013-AC**

**Comment #1(Technical Evaluation, Page 2 and Draft Permit , Section 1, Page 3)** – The description of the proposed project should be updated to reflect that as part of the Low Density Forming/Advanced Process Control Software project, Hosford plans to add a board scale and mechanical thickness gauge to the line after pressing. These scales will enable the site to quantify the weight and thickness of each board as a means to assess the effectiveness of low density forming and to control board quality. This measurement tool will not change the production increase contained in the permit application.

As such we request that the project description be changes to state "*This proposed project will modify the forming equipment that is used to form the mat which is subsequently pressed to form the OSB. The proposed low density forming project will involve replacing the existing core forming rolls with a different design roll which will allow for more efficient orientation of the flakes. In addition to the replacement core formers, a laser profiler will be used to detect changes in the mat height and relay information back to the control room operator for optimizing the core forming operations via the air profiling equipment. The air profiling equipment will allow the flakes to be positioned at the most efficient locations across the mat width.* ***The facility also proposes to install a board scale and thickness measurement system after the press****. The facility proposes to install advanced process control (APC) software to allow for more efficient control of process parameters within the drying process. No physical changes to any equipment in the drying process will result from the APC software installation.*

**Comment #2 (Section 2, page 6)** - Permit Condition 9.a. states:
*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 ten years following resumption of regular operations after the change.*

According to Rule 62-212.300(1)(e), F.A.C., the permittee is required to 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, or for a period of 10 years following resumption of regular operations if the change increases the design capacity of that emissions unit or its potential to emit that PSD pollutant.

Since the proposed project does not increase the design capacity of the emissions unit or its potential to emit that PSD pollutant, the monitoring period in Condition 9.a. should be **five** years versus **ten** years. As such, we request this condition be revised to state. "*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* ***five*** *~~ten~~ years following resumption of regular operations after the change*

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**Comment #3 (Additional Condition 14)**- The Intent to Issue permit states:
*14. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. An application for an operation permit shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days after initial operation. The permittee shall obtain an operating permit for this source before the expiration of the construction permit if the permittee desires to continue operation. [Rules 62.4-030, 62-4.050(3), 62-4.210(3), 62-4.220 and 62-210.300(1)(a) & (2), F.A.C.]*

To clarify GP's understanding of this permit condition, GP will complete compliance testing in accordance with Permit Condition 3.A.6 and 3.A.7. The application for an operation permit will include the required certification by a Professional Engineer, registered in the State of Florida. As discussed in a personal phone communication between Mark Aguilar, GP and Angelia Jackson, FDEP on December 16, 2011, the application will be submitted before the 75$^{th}$ calendar day following the date of the compliance test. The compliance test cannot be performed until the emission unit is capable of achieving normal operations and construction authorized by this permit is complete.