FILE COPY

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
Northwest District
160 W Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

September 26, 2012

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

Re: Project No. 0770010-014-AC
Georgia-Pacific Wood Products LLC, Hosford OSB Facility
Title V Source Air Construction Permit
Panel Press Upgades

Dear Mr. Temples:

On June 12, 2012, you submitted an application request to upgrade the panel press (EU 002) hydraulic system, with a more sophisticated control system, variable frequency drives and updated valves, reducing the overall press cycle time by an estimated 13.5 seconds. This facility is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and, the Draft Permit and Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Rick Prusa, at 850.595.0634 or rick.prusa@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator
Northwest District Office

Enclosures

RB/rp/c

# WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an*
*Application for Air Permit by:*

Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

*Authorized Representative:*
Johnnie Temples, Plant Manager

Project No. 0770010-014-AC
Title V Source Air Construction Permit
Liberty County, Florida

Hosford OSB Facility
Panel Press Upgrade

**Facility Location**: Georgia-Pacific Wood Products LLC operates the existing Hosford OSB Facility, which is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida.

**Project**: The applicant proposes to upgrade the panel press (EU 002) hydraulic system, with a more sophisticated control system, variable frequency drives and updated valves, reducing the overall press cycle time by an estimated 13.5 seconds. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority**: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical address and mailing address is: 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. The Permitting Authority's telephone number is 850/595-8300.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S). Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit**: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice**: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051 of the Florida

Statutes, to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850.245.2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available in this proceeding.

Executed in Pensacola, Florida.

Rick Bradburn
Air Program Administrator
Northwest District Office

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on September 26, 2012 to the persons listed below.

Johnnie Temples, Georgia-Pacific Wood Products LLC: jrtemple@gapac.com
Madison McNealey, Georgia-Pacific Wood Products LLC: madison.mcnealey@gapac.com
Alyse Cardell, Trinity Consultants: acardell@trinityconsultants.com
Brad James, P.E., Trinity Consultants: bjames@trinityconsultants.com
Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov
DEP Northwest District Branch Office, Tallahassee

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) 9/26/12 (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

Florida Department of Environmental Protection
Air Resource Section, Northwest District Office
Draft Title V Source Air Construction Permit
Project No. 0770010-014-AC
Georgia-Pacific Wood Products LLC, Hosford OSB Facility
Liberty County, Florida

**Applicant**: The applicant for this project is Georgia-Pacific Wood Products LLC. The applicant's authorized representative and mailing address is: Mr. Johnnie Temples, Plant Manager, Georgia-Pacific Wood Products LLC, Hosford OSB Facility, Post Office Box 322, Hosford, Florida 32334.

**Facility Location**: Georgia-Pacific Wood Products LLC, operates the existing Hosford OSB Facility, which is located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida.

**Project**: This project upgrades the panel press hydraulic system, which provides force to open and close the panel press during OSB production. A more sophisticated control system, variable frequency drives, and updated valves will allow for faster and smoother press openings and closings, and reduce wear on the press components. The panel press upgrade reduces the overall press cycle time by an estimated 13.5 seconds. This increases facility-wide actual hourly emissions of CO, $NO_X$, PM, $PM_{10}$, $PM_{2.5}$, VOC and $SO_2$. The Five Flake Dryers' processing rate per 12-month rolling average, the Panel Press's annual production of oriented strandboard per consecutive 12-month period, and their hourly pollutant emissions limits are not changed by this project.

**Permitting Authority**: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical and mailing address is: 160 W Government Street, Suite 308, Pensacola, Florida 32502-5740. The Permitting Authority's telephone number is 850.595.8300.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp.

**Notice of Intent to Issue Air Permit**: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the

Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850.245.2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available for this proceeding.

**(Public Notice to be Published in the Newspaper)**

# TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

Georgia-Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334

Hosford OSB Facility
Facility ID No. 0770010

## PROJECT

Project No. 0770010-014-AC
Application for Title V Source Air Construction Permit
Panel Press Upgrade

## COUNTY

Liberty, Florida

## PERMITTING AUTHORITY

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

September 26, 2012

## 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, an oriented strand board manufacturing facility, is an existing major stationary source, 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 project upgrades the panel press (EU 002) hydraulic system, which provides force to open and close the panel press during OSB production. A more sophisticated control system, variable frequency drives, and updated valves will allow for faster and smoother press openings and closings, and reduce wear on the press components. The panel press upgrade reduces the overall panel press cycle time by an estimated 13.5 seconds. This increases potential hourly emissions. The Five Flake Dryers' (EU 001) processing rate limit of 693,272 ODT/12-month rolling average, the Panel Press's (EU 001) production limit of 600 million square feet on a 3/8-inch basis oriented strandboard per consecutive 12-month period, and their hourly pollutant emissions limits are not changed in this project.

### Processing Schedule

June 12, 2012 Received the application for a minor source air pollution construction permit.

July 2, 2012 Requested additional information.

July 30, 2012 Received additional information; application complete.

## 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

The project meets the definition of "modification" in Rule 62-210.200(205), F.A.C.,-because the project involves physical changes to the process machinery, and an increase in dryer throughput and panel production over current operating rates may result in an increase of actual emissions over the current rate. The applicant performed a PSD applicability determination by comparing baseline actual emissions to projected actual emissions with the significant emissions rates, deducting for the demand growth exclusions.

The Baseline Actual to Projected Actual Applicability Test for modifications, per Rule 62-212.400(2)(a)1., F.A.C., was used to determine that the proposed project was not considered a major modification. The baseline actual emissions (BAE) were determined using the highest average annual rate in TPY for each pollutant during a consecutive 24-month period within the 10 year period immediately prior to the proposed project. For the projected actual emissions (PAE) calculation, Rule 62-210.200(252)(c), F.A.C., states, "In determining the projected actual emissions, the Department shall exclude that portion of the units emissions following the project that an existing unit could have accommodated during the 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth." All of the PAEs, which are less than permit limits, can be accommodated as demand growth.

The OSB production increase related to the decrease in cycle time of the panel press was estimated using calculations of pre-project and post-project production numbers in MSF/yr, determining the difference for each of seven OSB products (board thickness in inches), and conservatively selecting the difference having the largest maximum production increase in MSF/yr. This increase was used to calculate project related emissions (PRE) increases. The demand growth exclusion from the project was calculated by PAE minus BAE minus PRE.

The following table summarizes emissions and PSD applicability for the project.

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

| Pollutant (TPY) | Potential Emissions[1] | Baseline Actual Emissions (BAE)[2] | Projected Actual Emissions (PAE)[2] | Demand Growth Exclusion (DGE)[2] | Emissions Increase[3] | Significant Emissions Rate | Subject to PSD |
|---|---|---|---|---|---|---|---|
| **CO** | 250.20 | 91.81 | 150.22 | 45.91 | 12.50 | 100 | No |
| **$NO_X$** | 428.76 | 191.06 | 216.99 | 7.89 | 18.04 | 40 | No |
| **PM** | 351.13 | 133.61 | 157.29 | 11.43 | 12.25 | 25 | No |
| **$PM_{10}$** | 329.80 | 119.68 | 141.84 | 11.23 | 10.93 | 15 | No |
| **$PM_{2.5}$** | 300.58 | 105.29 | 125.62 | 10.77 | 9.56 | 10 | No |
| **$SO_2$** | 23.05 | 16.40 | 18.38 | 0.35 | 1.63 | 40 | No |
| **VOC** | 594.40 | 135.94 | 182.25 | 31.03 | 15.28 | 40 | No |
| **$CO_2e$** | 174646 | 23509 | 51157 | 23065 | 4583 | 75,000 | No |

1 Facility Potential to Emit, from table on page 1 of 11, construction permit application report dated 6/2012.
2 BAE, PAE and DGE from Table 4-5, PSD Applicability Analysis, updated calculations dated 7/24/2012
3 Emissions Increase = PAE – BAE – DGE

This facility is a major stationary source for PSD because it has the potential to emit 250 TPY or more of CO, $NO_X$, PM, $PM_{10}$, $PM_{2.5}$ and VOC. As shown in the above table, the projected emissions increases do not exceed the significant emissions rates defined in Rule 62-210.200. Based on these facts is it determined that the project is not subject to PSD preconstruction review.

## 3. APPLICATION REVIEW

### Application Fee

This is a Title V facility, exempt from permitting fees, subject to annual emissions fees.

### Discussion of Emissions

The project involves physical changes to the process machinery that may decrease the panel press cycle time by up to 13.5 seconds and thus can result in higher hourly emissions. However, it must be noted that the increase in

actual emissions is probably due as much or more to a projected increase in dryer throughput and panel production over current operating rates.

The material processing rates and BACT/MACT determination hourly emissions limits in the current operating permit 0770010-012-AV for the dryers and the panel press were originally set in permit 0770010-002-AC PSD-FL-282A (PSD-FL-282A). Construction permit 0770010-014-AC does not request any changes in the dryers' or panel press' process rates or the hourly emissions limits in permit 0770010-012-AV. The facility has not exceeded, does not plan to exceed, and is not seeking a change in, the existing permitted operating rates or pollutant lbs/hr limits established by permit PSD-FL-282A. The facility has been operating well below the PTE established by permit PSD-FL-282A.

The dryers have a permitted operating rate limit of 693,272 ODT/yr. The facility has been operating the dryers at a rate of 452,395 ODT/yr and they wish to operate the dryers at a rate of 461,947 ODT/yr. Since they will be drying more wood chips per hour they expect hourly emissions to increase accordingly at this emissions unit.

The panel press has a permitted operating limit of 600 MMSF 3/8" basis panels per 12 month period. The physical changes to the press motive components and controls may allow them to reduce the overall press cycle time by an estimated 13.5 seconds per cycle. The facility has been operating the press at a rate of 503.1 MMSF/y and they wish to operate the press at a rate of 508.327 MMSF/yr. Since they will be able to produce more panels per hour they expect hourly emissions to increase accordingly at this emissions unit.

Both emissions units have BACT/MACT determination lb/hr limits for $PM/PM_{10}$, $NO_X$, CO and VOC. Emissions testing for the dryers and the panel press have shown actual hourly emissions to be well below the permitted hourly limits in PSD-FL-282A. The projected actual emissions after the panel press system upgrades will be less than the PTE established by PSD-FL-282A.

The application's projected potential emissions do not take into account the limiting effects of the ODT/yr or the MMSF/yr limits of PSD-FL-282A.

| **Comparison of Emissions; Potential per PSD-FL-282A, and Baseline and Projected Actuals Presented in Application 0770010-14-AC** | | | |
|---|---|---|---|
| Pollutant TPY | Potential[1], PSD-FL-282A<br>693272 ODT/yr<br>600 MMSF/yr, 3/8" basis | Baseline Actual[2]<br>452395 ODT/yr<br>501.3 MMSF/yr, 3/8" basis | Projected Actual[2]<br>461947 ODT/yr<br>508.327 MMSF/yr, 3/8" basis |
| CO | 395.9 | 91.81 | 150.22 |
| NOx | 449.6 | 191.06 | 216.99 |
| PM | 296.8 | 133.61 | 157.29 |
| PM10 | 296.8 | 119.68 | 141.84 |
| PM2.5 | - | 105.29 | 125.62 |
| VOC | 413.0 | 16.40 | 18.38 |
| SO2 | 33.6 | 135.94 | 182.25 |

1 Potentials to Emit from PSD-FL-282A are based on permit limits of 693,272 ODT/yr of flaked wood through the dryers, 600 MMSF/YR of OSB on a 3/8" basis from the panel press and hourly emissions limits and factors.

2 Baseline and Projected Actual Estimates base on actual stack test lbs/hr data times 8760 hrs/yr. these numbers do not take into account the limits on ODT/yr of flaked wood through the dryers or the limits on MMSF/YR of OSB by permit PSD-FL-282A.

**State Requirements**

State requirements in current Title V permit 0770010-012-AV, effective November 4, 2011, are not changed by this project.

**Federal NSPS Provisions**

Federal NSPS provisions in current Title V permit 0770010-012-AV, effective November 4, 2011, are not changed by this project.

**Federal NESHAP Provisions**

Federal NESHAP provisions in current Title V permit 0770010-012-AV, effective November 4, 2011, are not changed by this project.

**Other Draft Permit Requirements**

40 CFR 64 CAM requirements for Five Flake Dryers (EU 001), Panel Press (EU 002) and Thermal Heater System (EU 011) may need to be updated. Permittee will investigate and provide changes if needed.

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. The project does not increase the design capacity or the potential to emit a PSD pollutant over amounts previously established by permit 0770010-002-AC PSD-FL-282A. Therefore, actual emissions reporting pursuant to Rule 62-212.300(1)(e), F.A.C., will be required for total PM, $PM_{10}$ and $PM_{2.5}$, for a period of five years following resumption of regular operations after the changes due to the project take effect.

## 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. Rick Prusa 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 850.595.0634 or rick.prusa@dep.state.fl.us.

# D.R.A.F.T.

**PERMITTEE:**

Georgia Pacific Wood Products LLC
Post Office Box 322
Hosford, Florida 32334
*Authorized Representative:*
Mr. Johnnie Temples, Plant Manager

Hosford OSB Facility
Air Permit No. 0770010-014-AC
Facility ID No. 0770010
SIC No. 2493
Permit Expires: (Date)

**FACILITY AND LOCATION**

Hosford OSB Facility is an existing oriented strand board manufacturing facility located in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The UTM coordinates are Zone 16, 713.5 km East, and 3369.5 km North.

**REGULATORY CLASSIFICATION**

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

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution (Chapter 62-213, F.A.C.).

PSD: The existing facility is a PSD-major source of air pollution (Rule 62-212.400, F.A.C.).

This construction permit for the Panel Press (EU 002) authorizes the following:

1) Replacing existing pre-fill valves with electric motor-driven (E-drive) pre-fill proportional control valves, going from a hydraulic to precision-electric based mechanism and improving the actuating of key valves.
2) Updating the panel press hydraulic control system by installing a replacement PVL pump with proportional control of weight transfer and replacing the "fast and slow let down circuit" with a single large manifold with proportional valves in parallel acting as one large proportional valve.
3) Adding variable frequency drives to existing c-pumps.

These changes will reduce the press cycle time by up to 13.5 seconds and will increase potential short-term OSB production (MSF/hr) capacity, which will increase short-term emissions (lb/hr) for the following: Five Flake Dryers (EU 001), Thermal Oil System (EU 011), Panel Press (EU 002), Baghouses (EUs 003-005, and EUs 007-009), Blender, Debarker and Roads (EU 010), and Miscellaneous Coatings (EU 014).

The BACT/MACT determination emissions limits for $PM/PM_{10}$, $NO_X$, CO, VOC and VE and the production limit of 600 million square feet of oriented strand board (OSB) on a 3/8-inch basis, per consecutive 12-month period do not change.

**SPECIFIC CONDITIONS**

**1.** Previous Permits: This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the change noted below, the unit remains subject to the conditions of all other valid air construction and operations permits. [Rule 62-4.070, F.A.C.]

**2.** Panel Press (EU 002) Hydraulic System Upgrades: The permittee is authorized to install electric motor-driven (E-drive) pre-fill proportional control valves, replace a PVL pump with proportional control of weight transfer,

replace the "fast and slow let down circuit" with a single large manifold with proportional valves in parallel, and add variable frequency drives to existing c-pumps. [Application No. 0770010-014-AC]

**3.** CAM Plan – Five Flake Dryers (EU 001), Panel Press (EU 002), & Thermal Oil System (EU 011): These emissions units are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. Permittee shall evaluate changes to the these emissions units brought about by this project and provide an updated CAM plan or a statement that no update is required to the Department in writing within 90 days of issuance of this permit. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

**4.** 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 PM emissions for total PM, $PM_{10}$ and $PM_{2.5}$, for the following units: Five Flake Dryers (EU 001), Thermal Oil Heaters (EU 011), Panel Press (EU 002), Baghouses (EUs 003-005, and EUs 007-009), Fugitives (EU 010), and Miscellaneous Coatings (EU 014). [Application 0770010-014-AC; Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

*{Permitting Note: Annual emissions reporting is on a calendar year basis, for a period of five years following resumption of regular operations after the change. Monitoring for calendar year one starts on January 1 of the year following resumption of regular operations after completion of construction (the change). For example, if construction was completed in July 2000 and regular operations resumed in August 2000. Monitoring for calendar year one would run from January 1, 2001 through December 31, 2001. The annual emissions report for calendar year one would be due 60 days from December 31, 2001.}*

**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, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.).

Executed in Pensacola, Florida.

(DRAFT)

Rick Bradburn — Date
Air Program Administrator

# SECTION 4. APPENDICES (DRAFT)

## Contents

Appendix A. Citation Formats and Glossary of Common Terms
Appendix B. General Conditions
Appendix C. Common Conditions

## Citation Formats and Glossary of Common Terms

### CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

**New Permit Numbers**

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number for that county

"001" identifies the specific permit project number

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor source federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project number

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

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

### GLOSSARY OF COMMON TERMS

**° F**: degrees Fahrenheit

**AAQS**: Ambient Air Quality Standard

**acf**: actual cubic feet

**acfm**: actual cubic feet per minute

**ARMS**: Air Resource Management System (DEP database)

**BACT**: best available control technology

**bhp**: brake horsepower

**Btu**: British thermal units

**CAM**: compliance assurance monitoring

**CEMS**: continuous emissions monitoring system

**cfm**: cubic feet per minute

**CFR**: Code of Federal Regulations

## Citation Formats and Glossary of Common Terms

**CAA**: Clean Air Act

**CMS**: continuous monitoring system

**CO**: carbon monoxide

**$CO_2$**: carbon dioxide

**COMS**: continuous opacity monitoring system

**DARM**: Division of Air Resource Management

**DEP**: Department of Environmental Protection

**Department**: Department of Environmental Protection

**dscf**: dry standard cubic feet

**dscfm**: dry standard cubic feet per minute

**EPA**: Environmental Protection Agency

**ESP**: electrostatic precipitator (control system for reducing particulate matter)

**EU**: emissions unit

**F.A.C.**: Florida Administrative Code

**F.A.W.**: Florida Administrative Weekly

**F.D.**: forced draft

**F.S.**: Florida Statutes

**FGD**: flue gas desulfurization

**FGR**: flue gas recirculation

**Fl**: fluoride

**$ft^2$**: square feet

**$ft^3$**: cubic feet

**gpm**: gallons per minute

**gr**: grains

**HAP**: hazardous air pollutant

**Hg**: mercury

**I.D.**: induced draft

**ID**: identification

**kPa**: kilopascals

**lb**: pound

**MACT**: maximum achievable technology

**MMBtu**: million British thermal units

**MSDS**: material safety data sheets

**MW**: megawatt

**NESHAP**: National Emissions Standards for Hazardous Air Pollutants

**$NO_X$**: nitrogen oxides

**NSPS**: New Source Performance Standards

**O&M**: operation and maintenance

**$O_2$**: oxygen

**Pb**: lead

**PM**: particulate matter

**$PM_{10}$**: particulate matter with a mean aerodynamic diameter of 10 microns or less

**ppm**: parts per million

**ppmv**: parts per million by volume

**ppmvd**: parts per million by volume, dry basis

**QA**: quality assurance

**QC**: quality control

**PSD**: prevention of significant deterioration

**psi**: pounds per square inch

**PTE**: potential to emit

**RACT**: reasonably available control technology

**RATA**: relative accuracy test audit

**RBLC**: EPA's RACT/BACT/LAER Clearinghouse

**SAM**: sulfuric acid mist

**scf**: standard cubic feet

**scfm**: standard cubic feet per minute

**SIC**: standard industrial classification code

**SIP**: State Implementation Plan

**SNCR**: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)

**$SO_2$**: sulfur dioxide

**TPD**: tons/day

**TPH**: tons per hour

**TPY**: tons per year

**TRS**: total reduced sulfur

**UTM**: Universal Transverse Mercator coordinate system

**VE**: visible emissions

**VOC**: volatile organic compounds

## SECTION 4. APPENDIX B (DRAFT)

### General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under conditions of the permit;

   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

   a. A description of and cause of noncompliance; and

   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

## General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

    a. Determination of Best Available Control Technology (not applicable);

    b. Determination of Prevention of Significant Deterioration (not applicable); and

    c. Compliance with New Source Performance Standards (not applicable).

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

        (a) The date, exact place, and time of sampling or measurements;

        (b) The person responsible for performing the sampling or measurements;

        (c) The dates analyses were performed;

        (d) The person responsible for performing the analyses;

        (e) The analytical techniques or methods used;

        (f) The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

**EMISSIONS AND CONTROLS**

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. Notification may be submitted by electronic mail to nwdair@dep.state.fl.us. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]

4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

   - All VOC containers shall be tightly covered when not in use.
   - Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
   - All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.
   - Excessive air turbulence across exposed VOC's shall be prevented.
   - Any VOC spillage shall be immediately confined and cleaned up. Wastes shall be placed in appropriate and closed containers for reuse, recycling, or appropriate disposal.

   [Rule 62-296.320(1)(a), F.A.C. and Permit 0770010-002-AC]
   *{Permitting Note: Fugitive sources of VOC are the blenders where chips are blended with wax, and additives; and finished product storage. The specific formulation is not limited by this permit provided fugitive emissions will not exceed the estimate for this permit. The precautions specified above constitute BACT and are estimated to limit potential emissions for fugitive VOC to 1 TPY.}*

7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. The following were determined by Permittee to be appropriate for this facility:
   a. Paving and maintenance of roads, parking areas, and yards.
   b. Application of water or other suppressants to unpaved roads, yards, open stock piles, and other activities to control emissions.
   c. Removal of particulate matter from roads and other paved areas to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   d. Landscaping or planting of vegetation.
   e. Enclosure or covering of conveyor systems.

   [Rule 62-296.320(4)(c), F.A.C.]

**RECORDS AND REPORTS**

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]

11. Emissions Computation and Reporting:

    a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

    b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

       (1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

          (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.

          (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

          (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

       (2) Continuous Emissions Monitoring System (CEMS).

          (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:

             1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance

requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or

2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.

(b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:

1) A calibrated flow meter that records data on a continuous basis, if available; or

2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

(3) Mass Balance Calculations.

(a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:

1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.

(b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.

(c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(4) Emission Factors.

a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are

computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

(5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

(6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

(7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.

(8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

(1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:

a. All Title V sources.

b. All synthetic non-Title V sources.

c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.

d. All facilities for which an annual operating report is required by rule or permit.

(2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.

(3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.

(4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

(5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

**ADDITIONAL CONDITIONS**

12. Annual Emissions Fee Form and Fee: The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P. O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

13. Stack Sampling: Permittee shall install and maintain permanent stack sampling facilities, including sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet requirements of Rule 62-297.310(6), F.A.C., and any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. [Rule 62-297.310(6), F.A.C.]

14. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. 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. [Rules 62.4-030, 62.4-160(2) and 62-4.050(3), F.A.C.]

15. Application for operation permit: 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. You can obtain a permit application form or apply for permit electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rules 62.4-030, 62.4-160(2) and 62.210.300(2), F.A.C.]

16. The Department shall be notified upon commencement of construction. Notification may be submitted by electronic mail to nwdair@dep.state.fl.us. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports. [Rule 62-4.030, F.A.C.]

17. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]