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

PERMITTEE:

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

Hosford, FL OSB Facility
Air Permit No. 0770010-014-AC
Facility ID No. 0770010
SIC No. 2493
Permit Expires: November 4, 2016

FACILITY AND LOCATION

The Hosford, FL 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.

Rick Bradburn

10/17/12

Rick Bradburn
Air Program Administrator

Date

SECTION 4. APPENDICES

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

SECTION 4. APPENDIX A

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

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.

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.

SECTION 4. APPENDIX C

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.]

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

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

PROJECT

Air Permit No. 0770010-014-AC
Title V Source Air Construction Permit
Hosford, FL OSB Facility Panel Press Upgrade

This project will 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.

NOTICE AND PUBLICATION

The Department distributed a draft Title V source air construction permit package on September 26, 2012. The applicant published the Public Notice in the Calhoun-Liberty Journal on October 3, 2012. The Department received the proof of publication on October 10, 2012. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the EPA Region 4 Office or the applicant.

CONCLUSION

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

Memorandum

Florida Department of
Environmental Protection

To: Rick Bradburn, Air Program Administrator

Through: Armando I. Sarasua, P.E., Air Permitting Supervisor

From: Rick Prusa, Project Engineer

Date: October 17, 2012

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

The final permit for this project is attached for your approval and signature, which authorizes upgrading the panel press hydraulic system with a more sophisticated control system, variable frequency drives and updated valves. The work will be performed in Liberty County at 12995 Northeast State Road 65 in Hosford, Florida. The project results in a Title V air construction permit and is not subject to PSD preconstruction review.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

RP/c

Curle, Mary Beth

From: Temples, Johnnie R. [JRTemple@GAPAC.com]
Sent: Wednesday, October 17, 2012 4:51 PM
To: Curle, Mary Beth
Cc: McNealey, Madison
Subject: RE: DEP Air Program Notice of Permit 0770010-014-AC; Georgia-Pacific Wood Products

I have received and can access the attachments.

Thank you,
Johnnie

From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Wednesday, October 17, 2012 2:58 PM
To: Temples, Johnnie R.
Subject: DEP Air Program Notice of Permit 0770010-014-AC; Georgia-Pacific Wood Products

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: Wednesday, October 17, 2012 1:50 PM
To: 'jtemple@gapac.com'
Cc: 'McNealey, Madison'; 'acardell@trinityconsultants.com'; 'bjames@trinityconsultants.com'; Wilson, Cliff; White, Tracy A.; Bradburn, Rick; Sarasua, Armando; Melton, Carol; Prusa, Rick
Subject: DEP Air Program Notice of Permit 0770010-014-AC; Georgia-Pacific Wood Products

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.

Curle, Mary Beth

From: Crandall, Lea
Sent: Wednesday, October 17, 2012 8:07 AM
To: Curle, Mary Beth
Subject: RE: Georgia-Pacific Wood Products LLC; Hosford FL OSB; Liberty County; 0770010-014-AC

Good Morning,

No petitions have been filed.

Thanks,
Lea

Lea Crandall
Agency Clerk
Office of General Counsel
3900 Commonwealth Blvd., MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212
Fax: (850) 245-2303

From: Curle, Mary Beth
Sent: Wednesday, October 17, 2012 8:47 AM
To: Crandall, Lea
Subject: Georgia-Pacific Wood Products LLC; Hosford FL OSB; Liberty County; 0770010-014-AC

Good morning. Have you received any petitions regarding subject permit? Thank you.

Mary Beth Curle
Administrative Assistant, Northwest District Air Program
850/595-0578; fax 850/595-8096

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.