



Hardwood Lumber
Pine Lumber & Plywood
Treated Wood Products

RECEIVED

MAY 07 2002

BUREAU OF AIR REGULATION

Corporate Headquarters
P.O. Box 829
Weldon, North Carolina 27890
Telephone: (919) 536-4211
Fax: (919) 536-3102

Please Respond To:

May 6, 2002

Ms. Cindy Phillips, PE
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**SUBJECT: COASTAL LUMBER COMPANY, HAVANA, FL
Plywood Manufacturing & Industrial Boiler MACT
Standards**

112(j) MACT Applicability Notification

Dear Ms. Phillips:

This letter is in response to a letter we received dated April 5, 2002 that advises us of Section 112(j) notification requirements.

1) The name, address (physical location), and brief description of the major source (facility):

Coastal Lumber Company
Industrial Products Group
Highway 27 North
Havana, FL 32333-1128

The plant is a southern pine softwood plywood manufacturing plant that was built in the early 1980s on the site of an existing sawmill. The sawmill was shut down in the early 1990s. There are three wood-fired boilers currently in operation.

2) An identification of the relevant industry type source category(ies) [See enclosed letter]:

Plywood and Composite Wood Products
Industrial, Commercial and Institutional Boilers

3) A list of emission units belonging to the relevant industry type source category(ies):

[Based on the listing in the current Title V air operation permit, 0390009-002-AV]

Plywood and Composite Wood Products

Plywood Pneumatic Conveying System
Green Chip Conveyor and Rail Chip Loading w/Cyclone
Three Plywood Veneer Dryers
Three Plywood Hot Presses

Cindy Phillips, PE
112(j) Notification
May 6, 2002

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Industrial, Commercial and Institutional Boilers

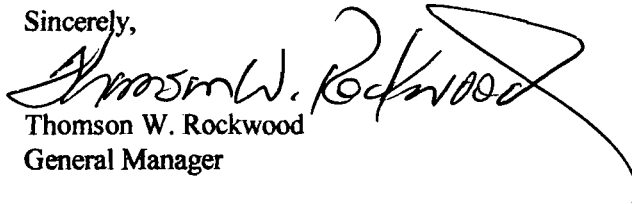
Wood-fired Boilers #4 & #5, 29.9 MMBtu/hr heat input each
Wood-fired Boiler #3, 61.1 MMBtu/hr heat input each

4) An identification of any affected sources for which a section 112(g) MACT Determination has been made:

In early February 2001, Coastal Lumber submitted an air construction permit application to the FDEP NWD Office for a permit to modify the plywood layup lines and add a third hot press. Prior to submitting that application, the company asked the FDEP Bureau of Air Regulation to make a formal rule applicability determination with respect to both PSD and Section 112(g) with respect to the proposed changes to the layup/hot presses production unit. The FDEP determined that neither PSD nor Section 112(g) applied to the proposed changes, but the modification did require an air construction permit. A copy of the FDEP rule applicability determination is enclosed.

I am the Title V permit Responsible Official. Please call or e-mail me if you have any questions about this notification.

Sincerely,



Thomson W. Rockwood
General Manager

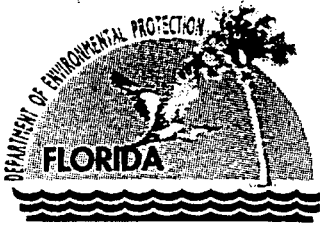
(850) 539-6432 x129
(850) 539-6799 fax
tomrockwood@msn.com

c: Mr. Doug Neeley, Air, Pesticides, and Toxics Management Division, USEPA Region IV,
61 Forsyth Street, SW, Atlanta, GA 30303-8960

Enclosure: (1) 112(j) Notification Requirements, April 5, 2002, Scott Sheplak, PE, Administrator,
Title V Section, FDEP Bureau of Air Regulation

(2) FDEP Coastal Lumber Company Rule Applicability Determinations, Modified Layup and Hot Presses Operation. December 11, 2000, Joseph Kahn, PE, New Source Review Section, Copies: Gregg Worley, EPA Region 4, Sandra Veazey, DEP NWD

. TWR/ssm



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 5, 2002

To the Title V Air Permitting Contact Person:

Our records indicate that your facility may be a major source of hazardous air pollutants and may be in the affected **Plywood and Composite Wood Products and/or Wood Building Products (Surface Coating) and/or Industrial, Commercial & Institutional Boilers and Indirect-fired Process Heaters** source category(ies). Therefore, you must notify us by **May 15, 2002** if you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category. A list of affected industry type source categories is printed on the reverse side of this letter.

The Clean Air Act (CAA), as amended in 1990, requires that the USEPA publish federal regulations by May 15, 2002 to determine the maximum achievable control technology (MACT) to reduce emissions of hazardous air pollutants (HAPs) from certain industry type source categories at facilities that emit major amounts of hazardous air pollutants. A major amount of hazardous air pollutants is considered to be 10 tons per year or more of a single hazardous air pollutant, or 25 tons per year or more of a combination of hazardous air pollutants. However, the USEPA is not likely to publish the federal MACT regulations until May 15, 2004 instead of May 15, 2002, the MACT "hammer" date. As a result, Section 112(j) of the Clean Air Act must be initiated.

If you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category, you must submit to our office and the USEPA by **May 15, 2002** the following **112(j) notification information**, which may be in letter format:

- (1) The name, address (physical location), and brief description of the major source (facility);
- (2) An identification of the relevant industry type source category(ies) [See list on reverse side of this letter.];
- (3) A list of the emission units belonging to the relevant industry type source category(ies); and
- (4) An identification of any affected sources for which a section 112(g) MACT determination has been made.


This submittal must be signed by the Title V permit Responsible Official. The mailing addresses for the 112(j) contacts at our office and the USEPA are:

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

This notification requirement does not affect the processing of any Title V permits that are undergoing renewal now or in the near future. Any newly applicable NESHAP requirements that may be promulgated by May 2004 will be incorporated into your Title V permit through the procedures specified in 40 CFR 70.7 (f), *Reopening for cause*. As before, any new construction or reconstruction that, by itself, will emit a major amount of hazardous air pollutants, will likely require a 112(g) Case-by-case MACT determination during the construction permitting process. If you have any questions, please contact Ms. Cindy Phillips at Cindy.Phillips@dep.state.fl.us or (850) 921-9534.

Sincerely,


Scott M. Sheplak, P.E., Administrator
Title V Section, Bureau of Air Regulation

"More Protection, Less Process"

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AFFECTED INDUSTRY TYPE SOURCE CATEGORIES

NESHAP NOT PROPOSED YET

- Auto & Light Duty (Surface Coating)
- Brick & Structural Clay Products Mfg.
- Combustion Turbines
- Fabric Printing, Coating, and Dyeing
- Industrial, Commercial and Institutional Boilers
and Indirect-fired Process Heaters
- Iron Foundries
- Lime Manufacturing
- Mercury Cell Chlor-Alkali Plants
- Metal Can (Surface Coating)
- Metal Furniture (Surface Coating)
- Misc. Metal Parts and Products (Surface Coating)
- Misc. Organic Chemical Production and Processes (MON)
- Organic Liquids Distribution (non-gasoline)
- Paint Stripping Operations
- Plastic Parts (Surface Coating)
- Plywood and Composite Wood Products
- Primary Magnesium Refining
- Reciprocating Internal Combustion Engines (RICE)
- Refractory Products Manufacturing
- Rocket Testing Facilities & Engine Test Cells/Stand
- Semiconductor Production
- Site Remediation
- Taconite Iron Ore Processing
- Wood Building Products (Surface Coating)

NESHAP PROPOSED BUT NOT FINAL YET

- Asphalt Roofing & Processing
- Cellulose Ethers Production Manufacturing
- Coke Oven: Pushing, Quenching, & Battery Stacks
- Flexible Polyurethane Foam Fabrication Operation
- Friction Materials Manufacturing
- Generic MACT
- Hydrochloric Acid Production
- Integrated Iron & Steel
- Large Appliance (Surface Coating)
- Metal Coil (Surface Coating) Industry
- Miscellaneous Viscose Processes
- Municipal Solid Waste Landfills
- Paper & Other Web (Surface Coating)
- Petroleum Refineries
- Polyvinyl Chloride and Copolymers Production
- Primary Copper
- Reinforced Plastics Products Manufacturing
- Tire Manufacturing
- Wet-Formed Fiberglass Mat Production



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

December 11, 2000

Stephen Smallwood, P.E.
Air Quality Services
1640 Eagles Landing Unit 103
Tallahassee, Florida 32308

Re: Coastal Lumber Company
Rule Applicability Determinations, Modified Layup and Hot Presses Operation

Dear Mr. Smallwood:

We have reviewed your letter dated November 16, 2000 regarding the changes planned by Coastal Lumber to its plywood layup and hot presses operation at the Havana, Florida plant. You requested a determination from this office regarding the applicability of PSD and case-by-case MACT to the facility because of this project. As described in your letter, the company plans to replace the existing plywood layup line with a newer layup line from another plant and add a third hot press. The facility will request an annual production limit of 227,760 MSF 3/8-inch plywood. This is compared to past actual annual production of 208,972 MSF 3/8-inch plywood. The change will not result in an increase in the potential amount of plywood produced per day or per year at the plant, and will not debottleneck other existing emissions units. The increases in emissions from the physical changes to the layup and hot presses operations are estimated to be far less than the PSD significance criteria. Because a hot press by itself cannot produce a final or intermediate product, the addition of the third press is not considered "construction" for purposes of MACT. The modification is not "reconstruction" based on the project cost estimates provided.

As you noted, a construction permit is required for the project, and the proposed annual production limit must be included as a practically enforceable condition in the construction permit. Given the information presented, the project will not be subject to PSD. The project is also not subject to a case-by-case MACT determination because it does not meet the requirements for construction or reconstruction under the MACT requirements.

Please contact me at 850-921-9519 if you have any questions about the above.

Sincerely,

Joseph Kahn, P.E.
New Source Review Section

/jk

cc: Gregg Worley, EPA Region 4
Sandra Veazey, DEP NWD