

Determination of Maximum Achievable Control Technology (MACT)
Louisiana-Pacific Corporation
Marianna Sawmill

The applicant, Louisiana-Pacific Corporation (L-P), proposes to construct and operate a sawmill. The primary sources of hazardous air pollutants (HAPs) emissions from the facility are the three lumber drying kilns while the other sources each emit less than 1 ton per year per HAP. The facility will be located at 6112 Old Spanish Trail, Cypress, Jackson County, Florida.

The estimated annual tonnage of regulated hazardous air pollutants to be emitted is as follows:

Pollutants	Potential Emissions (tons/year)	MACT Threshold Emission Rate (tons/year)
Formaldehyde	5.5	10
Methanol	20.5	10
Total HAPs	>25	25

Florida Administrative Code Rule 62-204.800(10)(d)2 requires a MACT review for all major sources of HAPs that are to be constructed or reconstructed, unless:

1. the source is specifically regulated or exempted from regulation under a standard issued pursuant to Section 112(d) "emission Standards," Section 112(h) "Work Practice Standards and Other Requirements," or Section 112(j) "Equivalent Emission Limitation by Permit," and incorporated in another subpart of 40 CFR Part 63; or
2. the owner or operator of the major source received an air construction permit for the construction or reconstruction project before July 1, 1997, or the source was constructed or reconstructed before July 1, 1997.

MACT Determination Requested by the Applicant

Louisiana-Pacific Corporation performed a data search for other lumber drying kilns in the country to find the best-controlled similar source. A review of EPA's RACT/BACT/LAER clearinghouse revealed no controls on lumber drying kilns.

L-P also contacted other major lumber processing companies in the United States. These companies included Georgia-Pacific Corporation, Willamette Corporation, Potlatch Corporation, Temple-Inland Forest Products Corporation and Weyerhaeuser Paper Company. L-P stated that all of the representatives from these companies said that they were not aware of any existing kilns within the lumber industry that currently used emission control devices. In addition, L-P contacted Becky Nicholson of Midwest Research Institute who has been contracted by the USEPA to develop the NESHAP for the wood products category. Ms. Nicholson stated that they will be proposing "no controls" for lumber drying kilns. L-P proposes that MACT for their lumber drying kilns be "no controls."

MACT Determination Procedure

In accordance with 40 CFR 63 Subpart B, which was adopted in Florida Administrative Code Chapter 62-204, *Maximum Achievable Control Technology (MACT) emission limitation for new sources* means the emission limitation which is not less stringent than the emission limitation achieved by the best controlled similar source, and which reflects the maximum degree of reduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed source.

Similar source means a stationary source or process that has comparable emissions and is structurally similar in design and capacity to a constructed or reconstructed source such that the source could be controlled using the same control technology.

In addition, the regulations state that in making the MACT Determination, the Department should give consideration to:

- (a) Any Environmental Protection Agency proposed relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or an adopted presumptive MACT determination for the source category which includes the constructed or reconstructed major source.
- (b) Available information as defined in 40 CFR 63.41.

Though the USEPA has not yet proposed a NESHAP for this source category, MACT for lumber drying kilns is expected to be "no controls".

MACT Determination

After reviewing the applicant's proposed MACT and conferring with the USEPA and their contractor for this NESHAP source category, the Department has made the determination that Maximum Achievable Control Technology (MACT) for the three lumber drying kilns shall be "no controls."

Details of the Determination may be obtained by contacting:

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MS 5505, Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

Recommended by:

Cindy L. Phillips 8/16/00
Cindy L. Phillips, P.E. Date
Air Toxics/Title III Section
Bureau of Air Regulation

C. H. Fancy 8/16/00
C. H. Fancy, P.E. Date
Chief
Bureau of Air Regulation

Approved by:

Howard L. Rhodes 8/18/00
Howard L. Rhodes, Director Date
Division of Air Resources
Management