Louisiana-Pacific Corporation

8731 Steelfield Rd.
Panama City Beach, FL 32413

(850) 234-6692
(850) 235-1769 Fax

June 14, 2000

Mr. Rick Bradburn X1233
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Re: Louisiana-Pacific Corporation
Marianna Sawmill Construction Permit Application
Facility ID No. 0630028

Dear Mr. Bradburn:

Enclosed are three (3) copies of supplemental information for the Marianna Sawmill Construction Permit Application. The information provided details the expected emissions of Hazardous Air Pollutants (HAPs) from the facility as a result of the proposed upcoming expansion.

The emissions estimates provided are for acetaldehyde (H001), formaldehyde (H095), methanol (H115), methyl ethyl ketone (H120) and phenol (H144). The primary sources of HAPs emissions at the facility will be the lumber drying kilns (EU-001, EU-002 & EU-003). Additional estimates have been provided for the planermill cyclone (EU-004), which is a source of acetaldehyde, formaldehyde, methanol and phenol emissions. This data was extrapolated from similar emissions sources at a plywood veneer facility. Emissions of MEK during the testing were not detected.

Included in the enclosures are several replacement pages for Section 4 (Forms) and the detailed emission estimates. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Geri Ann Shoop

Geri Shoop
Environmental Manager

Enclosures (3)

Cc: Mike Anderson (with enclosures)
Don Whitman (w/o enclosures)
Mill Application Copy (with enclosures)

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
NOX	B				
CO	A				
VOC	A				
SO2	B				
PM10	A				
H001 (Acetaldehyde)	B				
H095 (Formaldehyde)	B				
H115 (Methanol)	A				
H120 (MEK)	B				
H144 (Phenol)	B				

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM10			EL
VOC			EL
NOX			EL
CO			EL
SO2			EL
H001 (Acetaldehyde)			EL
H095 (Formaldehyde)			EL
H115 (Methanol)			EL
H120 (MEK)			EL
H144 (Phenol)			EL

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM10			EL
VOC			EL
NOX			EL
CO			EL
SO2			EL
H001 (Acetaldehyde)			EL
H095 (Formaldehyde)			EL
H115 (Methanol)			EL
H120 (MEK)			EL
H144 (Phenol)			EL

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM10			EL
VOC			EL
NOX			EL
CO			EL
SO2			EL
H001 (Acetaldehyde)			EL
H095 (Formaldehyde)			EL
H115 (Methanol)			EL
H120 (MEK)			EL
H144 (Phenol)			EL

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM10			EL
VOC			EL
H001 (Acetaldehyde)			EL
H095 (Formaldehyde)			EL
H115 (Methanol)			EL
H144 (Phenol)			EL

Hazardous Air Pollutants
Louisiana-Pacific Corporation - Marianna Sawmill

Source	Source ID	Acetaldehyde (tpy)	Ref	Formaldehyde (tpy)	Ref	Methanol (tpy)	Ref	MEK (tpy)	Ref	Phenol (tpy)	Ref
Lumber Drying Kiln	EU-001	1.66	51	1.83	55	6.85	59	0.20	63	0.71	66
New Lumber Drying Kiln	EU-002	1.66	52	1.83	56	6.85	60	0.20	64	0.71	67
New Lumber Drying Kiln	EU-003	1.66	53	1.83	57	6.85	61	0.20	65	0.71	68
Planermill Cyclone	EU-004	0.03	54	0.01	58	0.39	62	---		0.07	69
Total Emissions		4.98		5.49		20.55		0.60		2.13	
Single Pollutant Major Source Level		10									
Facility Total Major Source Level		25									
Major Source of HAPs? Y or N		**Y**									

HAPs Emission Calculations

Acetaldehyde Emissions Calculations

EMISSION POINT NO. 1 (EU-001)
51 LUMBER DRYING KILN

Basis	Value	Reference
Acetaldehyde Emission Factor	0.068 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{1.66\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{0.62\ lb}}{\mathbf{hr}}$$

EMISSION POINT NO. 2 (EU-002)
52 NEW LUMBER DRYING KILN

Basis	Value	Reference
Acetaldehyde Emission Factor	0.068 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{1.66\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{0.62\ lb}}{\mathbf{hr}}$$

HAPs Emission Calculations

EMISSION POINT NO. 3 (EU-003)
53 NEW LUMBER DRYING KILN

Basis	Value	Reference
Acetaldehyde Emission Factor	0.068 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \mathbf{\frac{1.66\ \text{tons}}{\text{yr}}}$$

Hourly

$$\frac{0.068\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \mathbf{\frac{0.62\ \text{lb}}{\text{hr}}}$$

EMISSION POINT NO. 4 (EU-004)
54 PLANERMILL CYCLONE

Basis	Value	Reference
Acetaldehyde Emission Factor	0.002 lb/ton	Extrapolated test data from a plywood facility
Shavings Production	29,340 tons/yr	Future expected shavings production
Shavings Production	5.44 tons/hr	Future expected shavings production

Calculation:
Annual

$$\frac{0.002\ \text{lb}}{\text{ton}} * \frac{29{,}340\ \text{tons}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \mathbf{\frac{0.03\ \text{tons}}{\text{yr}}}$$

Hourly

$$\frac{0.002\ \text{lb}}{\text{ton}} * \frac{5.44\ \text{tons}}{\text{hr}} = \mathbf{\frac{0.01\ \text{lb}}{\text{hr}}}$$

HAPs Emission Calculations

Formaldehyde Emissions Calculations

EMISSION POINT NO. 1 (EU-001)
55 **LUMBER DRYING KILN**

Basis	Value	Reference
Formaldehyde Emission Factor	0.075 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{1.83\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{0.68\ lb}}{\mathbf{hr}}$$

EMISSION POINT NO. 2 (EU-002)
56 **NEW LUMBER DRYING KILN**

Basis	Value	Reference
Formaldehyde Emission Factor	0.075 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{1.83\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{0.68\ lb}}{\mathbf{hr}}$$

HAPs Emission Calculations

EMISSION POINT NO. 3 (EU-003)
57 **NEW LUMBER DRYING KILN**

Basis	Value	Reference
Formaldehyde Emission Factor	0.075 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{1.83\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.075\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{0.68\ lb}}{\mathbf{hr}}$$

EMISSION POINT NO. 4 (EU-004)
58 **PLANERMILL CYCLONE**

Basis	Value	Reference
Formaldehyde Emission Factor	0.0009 lb/ton	Extrapolated test data from a plywood facility
Shavings Production	29,340 tons/yr	Future expected shavings production
Shavings Production	5.44 tons/hr	Future expected shavings production

Calculation:

Annual

$$\frac{0.0009\ \text{lb}}{\text{ton}} * \frac{29{,}340\ \text{tons}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{0.01\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.0009\ \text{lb}}{\text{ton}} * \frac{5.44\ \text{tons}}{\text{hr}} = \frac{\mathbf{0.005\ lb}}{\mathbf{hr}}$$

HAPs Emission Calculations

Methanol Emissions Calculations

EMISSION POINT NO. 1 (EU-001)
59 LUMBER DRYING KILN

Basis	Value	Reference
Methanol Emission Factor	0.28 lb/Mbf	Maximum factor from published data
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{6.85\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{2.54\ lb}}{\mathbf{hr}}$$

EMISSION POINT NO. 2 (EU-002)
60 NEW LUMBER DRYING KILN

Basis	Value	Reference
Methanol Emission Factor	0.28 lb/Mbf	Maximum factor from published data
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{6.85\ tons}}{\mathbf{yr}}$$

Hourly

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{2.54\ lb}}{\mathbf{hr}}$$

HAPs Emission Calculations

EMISSION POINT NO. 3 (EU-003)
61 NEW LUMBER DRYING KILN

Basis	Value	Reference
Methanol Emission Factor	0.28 lb/Mbf	Maximum factor from published data
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{6.85\ tons}}{\text{yr}}$$

Hourly

$$\frac{0.28\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{\mathbf{2.54\ lb}}{\mathbf{hr}}$$

EMISSION POINT NO. 4 (EU-004)
62 PLANERMILL CYCLONE

Basis	Value	Reference
Methanol Emission Factor	0.0265 lb/ton	Extrapolated test data from a plywood facility
Shavings Production	29,340 tons/yr	Future expected shavings production
Shavings Production	5.44 tons/hr	Future expected shavings production

Calculation:

Annual

$$\frac{0.0265\ \text{lb}}{\text{ton}} * \frac{29{,}340\ \text{tons}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{\mathbf{0.39\ tons}}{\text{yr}}$$

Hourly

$$\frac{0.0265\ \text{lb}}{\text{ton}} * \frac{5.44\ \text{tons}}{\text{hr}} = \frac{\mathbf{0.14\ lb}}{\mathbf{hr}}$$

HAPs Emission Calculations

Methyl Ethyl Ketone Emissions Calculations

EMISSION POINT NO. 1 (EU-001)
63 LUMBER DRYING KILN

Basis	Value	Reference
MEK Emission Factor	0.008 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{48.900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.20\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.07\ \text{lb}}{\text{hr}}$$

EMISSION POINT NO. 2 (EU-002)
64 NEW LUMBER DRYING KILN

Basis	Value	Reference
MEK Emission Factor	0.008 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Maximum annual fuel usage
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{48,900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.20\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.07\ \text{lb}}{\text{hr}}$$

HAPs Emission Calculations

EMISSION POINT NO. 3 (EU-003)
65 NEW LUMBER DRYING KILN

Basis	Value	Reference
MEK Emission Factor	0.008 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Maximum annual fuel usage
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.20\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.008\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.07\ \text{lb}}{\text{hr}}$$

HAPs Emission Calculations

Phenol Emissions Calculations

EMISSION POINT NO. 1 (EU-001)
66 **LUMBER DRYING KILN**

Basis	Value	Reference
Phenol Emission Factor	0.029 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Future expected kiln production
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.71\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.26\ \text{lb}}{\text{hr}}$$

EMISSION POINT NO. 2 (EU-002)
67 **NEW LUMBER DRYING KILN**

Basis	Value	Reference
Phenol Emission Factor	0.029 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Maximum annual fuel usage
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:
Annual

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{48.900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.71\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.26\ \text{lb}}{\text{hr}}$$

HAPs Emission Calculations

EMISSION POINT NO. 3 (EU-003)
68 NEW LUMBER DRYING KILN

Basis	Value	Reference
Phenol Emission Factor	0.029 lb/Mbf	Maximum factor from NCASI lumber database
Lumber Throughput	48,900 Mbf/yr	Maximum annual fuel usage
Lumber Throughput	9.06 Mbf/hr	Future expected kiln production

Calculation:

Annual

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{48{,}900\ \text{Mbf}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.71\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.029\ \text{lb}}{\text{Mbf}} * \frac{9.06\ \text{Mbf}}{\text{hr}} = \frac{0.26\ \text{lb}}{\text{hr}}$$

EMISSION POINT NO. 4 (EU-004)
69 PLANERMILL CYCLONE

Basis	Value	Reference
Phenol Emission Factor	0.005 lb/ton	Extrapolated test data from a plywood facility
Shavings Production	29,340 tons/yr	Future expected shavings production
Shavings Production	5.44 tons/hr	Future expected shavings production

Calculation:

Annual

$$\frac{0.005\ \text{lb}}{\text{ton}} * \frac{29{,}340\ \text{tons}}{\text{yr}} * \frac{1\ \text{Ton}}{2{,}000\ \text{lb}} = \frac{0.07\ \text{tons}}{\text{yr}}$$

Hourly

$$\frac{0.005\ \text{lb}}{\text{ton}} * \frac{5.44\ \text{tons}}{\text{hr}} = \frac{0.03\ \text{lb}}{\text{hr}}$$

Post-it® Fax Note 7671	Date 8/14/00	# of pages ▶ 11
To Cindy Phillips	From Rick Bradburn	
Co./Dept. DARM	Co. NWD	
Phone #	Phone # SC 695 8364	
Fax # SC 922 6979	Fax #	x1233

Louisiana-Pacific Corporation

8731 Steelfield Rd.
Panama City Beach, FL 32413

(850) 234-6692
(850) 235-1769 Fax

August 9, 2000

CERTIFIED MAIL # 7099 3220 0011 1739 3562
RETURN RECEIPT REQUESTED

Mr. Rick Bradburn
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Re: Louisiana-Pacific Corporation
Marianna Sawmill Construction Permit Application
Facility ID No. 0630028

Dear Mr. Bradburn:

As shown in the submittal by Louisiana-Pacific Corporation for the above referenced facility on June 14, 2000, the expected hazardous air pollutants (HAPs) emissions from the facility will exceed the major source thresholds, therefore the facility is subject to a "case-by-case" Maximum Achievable Control Technology (MACT) review. The primary sources of HAPs emissions from the facility are the three lumber drying kilns while the other sources each emit less than 1 tpy per HAP, therefore the MACT review concentrated on controlling the emissions from the kilns.

The first step taken in the development of the case-by-case MACT was to determine if there were any similar facilities in operation which are currently utilizing any emission control devices for lumber drying kilns. EPA's RACT/BACT/LAER (RBLC) database of permitted facilities was reviewed for any process units within the lumber industry. Table 1 illustrates the entire database contents for the lumber processing industry. Four of the listings are for lumber drying kilns, yet all show that no control device is currently employed.

However, previous experience has shown that the RBLC database is not entirely comprehensive and therefore additional review of the industry was warranted. As a result, Louisiana-Pacific Corporation contacted the EPA contractor, Midwest Research Institute (MRI), for the development of the MACT standards for the wood products industry. In a phone conversation with Becky Nicholson, the MACT development program manager for MRI, L-P was informed that MRI was not aware of any existing lumber drying kilns in the country which currently employed emissions control devices. Additionally, MRI was going to propose to EPA that the MACT standard for the lumber industry would be "no controls." A record of this discussion is attached.

Based upon the information from MRI, the National Council for Air and Stream Improvement (NCASI) was also contacted to determine if there was any additional information they could provide for the study. Mr. David Word of NCASI, provided information regarding the development of the database for the wood products industry by MRI. The information in the database is from surveys of wood products facilities and that any lumber kilns contained would be from co-located lumber and other wood products facilities. A record of this discussion is attached.

Given the information from MRI and NCASI, L-P also contacted representatives from the 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. All of the representatives from these companies stated that they were not aware of any existing kilns within the lumber industry that currently used emission control devices. The records of the discussions with the various industry representatives are attached.

Therefore, Louisiana-Pacific Corporation proposes a MACT determination for the Marianna Sawmill to be "no controls". This assessment is consistent with the expected determination by MRI and with current industry practice. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Geri Shoop
Environmental Manager

Cc: Don Whitman
Mike Anderson
Marianna Environmental Files

Table 1

EPA RBLC Database Information

Existing Lumber Drying Kilns

RBLCID	FACILITY	CITY	STATE	PROCESS	THRUPUT	THRUPUTUNT	POLLUTANT	PRIMEMISS	PRIMEUNIT	CONTROLCOD	BASIS
AL-0119	MACMILLAN BLOEDEL PACKAGING	PINE HILL	AL	HIGH TEMP LUMBER DRY KILN	200	MBF	VOC	4.52	LB/MBF	N	BACT-PSD
AL-0119	MACMILLAN BLOEDEL PACKAGING	PINE HILL	AL	HIGH TEMP LUMBER DRY KILN	200	MBF	PM	0.066	LB/MBF	N	BACT-PSD
AL-0119	MACMILLAN BLOEDEL PACKAGING	PINE HILL	AL	PLANER MILL W/ HI EFFICIENC	130000	LB/HR	PM	3	LB/HR	A	BACT-PSD
AL-0119	MACMILLAN BLOEDEL PACKAGING	PINE HILL	AL	WOOD WASTE PNEUMATIC TR	130000	LB/HR	PM	1.7	LB/HR	A	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	MILL, PLANER	7.3	T/H	PM	0.21	LB/H	A	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	KILNS, LUMBER DRY	0		VOC	5.48	LB/MBF	N	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	BOILER, WOOD FIRED	98	MMBTU/H	PM	0.1	LB/MMBTU	A	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	BOILER, WOOD FIRED	98	MMBTU/H	CO	0.5	LB/MMBTU	N	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	BOILER, WOOD FIRED	98	MMBTU/H	VOC	0.1	LB/MMBTU	N	BACT-PSD
AL-0122	GULF STATES PAPER CORP	MOUNDVILLE	AL	BOILER, WOOD FIRED	98	MMBTU/H	NOX	0.3	LB/MMBTU	N	BACT-PSD
MS-0026	WEYERHAEUSER COMPANY	BRUCE	MS	BOILER, WOODWASTE	90	MMBTU HR	NOX	0.23	LB/MMBTU	P	BACT-PSD
MS-0026	WEYERHAEUSER COMPANY	BRUCE	MS	BOILER, WOODWASTE	90	MMBTU HR	CO	0.4	LB/MMBTU	P	BACT-PSD
MS-0034	HANKINS LUMBER COMPANY	ELLIOTT	MS	LUMBER DRY KILNS (5)	200	MBF/YR	PM	0.25	LB/MBF	N	BACT-PSD
MS-0034	HANKINS LUMBER COMPANY	ELLIOTT	MS	LUMBER DRY KILNS (5)	200	MBF/YR	VOC	3.5	LB/MBF	N	BACT-PSD
MS-0035	WEYERHAEUSER COMPANY	PHILADELPHIA	MS	KILNS, LUMBER DRY, 4	240000	MBF/YR, ALL KILNS	VOC	4	LB/MBF	N	BACT-PSD

Louisiana-Pacific Corporation

Record of Discussion

Between	Geri Shoop
of L-P and	Becky Nicholson
of	Midwest Research Institute
Phone No.:	(919) 851-8181 Ext. 5452
Date of Conversation:	6/26/2000

Background:
Midwest Research Institute (MRI) has been contracted by EPA to develop the Maximum Achievable Control Technologies (MACT) standards for the wood products industry. Ms. Nicholson is the manager of the program for MRI.

I contacted Ms. Nicholson regarding information pertaining to potential emission control devices applied to lumber drying kilns. She informed me that MRI was developing the federal standards and based upon their data there was not a single lumber kiln in the country which employed an emissions control device.

She further stated that MRI was going to propose to EPA that the MACT standard for the lumber manufacturing industry be "no controls," meaning that no additional control devices would be required to satisfy the MACT criteria.

Ms. Nicholson went on to inform me MRI has developed a database of their information and that a copy was provided to David Word of the National Council for Air and Stream Improvement (NCASI) as well as to the American Forest and Paper Association (AF&PA). She suggested that I contact Mr. Word for further information.

Louisiana-Pacific Corporation

Record of Discussion

Between	Geri Shoop
of L-P and	Victor Downes
of	Weyerhaeuser Paper Company
Phone No.:	(253) 924-6096
Date of Conversation:	July 12, 2000

Mr. Downes informed me that Weyerhaeuser did not have any emission control devices operating at any of their sawmill facilities. He also stated that he did not know of any facilities within the lumber industry which were operating emission control devices on lumber drying kilns.