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MAY 17 2002

BUREAU OF AIR REGULATION

May 15, 2002

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

Re: Submittal of MACT Hammer Part I Information

Dear Ms. Phillips,

This letter and permit information form are being submitted pursuant to 40 CFR 63.52, Approval process for new and existing affected sources. The Marianna Sawmill facility is engaged in the production of lumber. We have determined that our facility may be subject to the NESHAP source category, "Plywood and Composite Wood Products", for which the EPA Administrator has failed to promulgate an emission standard by May 15, 2002, as was required by section 112(j) of the Clean Air Act.

The site described above utilizes lumber kilns in its mill operations. We believe the site to be a potential major source of HAP emissions, based on relatively new emission factors for lumber kilns. We officially request, pursuant to 40 CFR 63.52(d), that the Florida Department of Environmental Protection provide a determination of the applicability of the Plywood and Composite Wood Products source category to the lumber kilns.

Should there be any questions concerning the attached information, please call John Gazzaway at (409) 283-8929.

Sincerely,

A handwritten signature in cursive script that reads "Don Gabriel".

Don Gabriel  
Plant Manager

cc: Mr. Doug Neeley, USEPA Region IV

CERTIFIED MAIL ARTICLE NO. 70011140000014763405

Louisiana-Pacific Corporation  
6112 Old Spanish Trail Marianna, FL 32448 850.592.8512 fax: 850.592.2460  
www.lpcorp.com

Model Part 1 Application for Case-by-Case MACT Determination  
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56

1. Company Name: Louisiana Pacific Corporation
2. Mailing Address: 6112 Old Spanish Trail  
Marianna, FL 32448
3. Name of Major Source: LP Marianna Sawmill
4. Location of Major Source: 6112 Old Spanish Trail Cypress, FL 32432
5. Description of Major Source: NAICS 321113 (SIC 2421), kiln drying and planing of dimensional softwood lumber
6. Applicable Section 112 Source Category: See Attachment.
7. Types of sources belonging to the relevant source category present at the major source: See Attachment.
8. Affected sources at the major source for which a section 112(g) MACT determination has been made: None
9. Pursuant to 40 CFR 63.52(e)(2)(ii), this source requests a determination that the section 112(g) MACT determination made for the above referenced affected source(s) is substantially as effective as the emission limitations which would otherwise be adopted pursuant to section 112(j) for the source(s) in question.  
Yes    X    No
10. Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), this source requests Florida Dept. of Environmental Protection to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part: (Identify the emissions units and the source category for which an applicability determination is requested.)  
Lumber Drying Kilns

I certify, based on information and belief, formed after a reasonable inquiry that the above information is true, accurate, and complete.

Bruce Mallory

Bruce Mallory  
General Manager Lumber Operations  
Responsible Official for Marianna Sawmill

5/08/02  
Date

Model Part 1 Application for Case-by-Case MACT Determination  
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56

1. Company Name: Louisiana Pacific Corporation
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6. Applicable Section 112 Source Category: See Attachment.
7. Types of sources belonging to the relevant source category present at the major source: See Attachment.
8. Affected sources at the major source for which a section 112(g) MACT determination has been made: None
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Yes        No
10. Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), this source requests Florida Dept. of Environmental Protection to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part: (Identify the emissions units and the source category for which an applicability determination is requested.)  
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Bruce Mallory  
Bruce Mallory  
General Manager Lumber Operations  
Responsible Official for Marianna Sawmill

5/08/02  
Date

**Attachment**  
**Applicable Section 112 Source Category(ies)**  
**Part 1 Application for Case-by-Case MACT Determination**  
**Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56**

**Instructions:** Review all of the categories below. Check the box next to those categories for which the facility can reasonably determine that one or more sources at the major source belong in the category. For those checked categories, list the types of sources belonging to the relevant source category. The listing of the types of sources in the category does not require a detailed listing of the emissions units at the facility but rather a more general statement regarding the types of units that will be regulated under the particular category. NOTE: This list is based on several EPA publications regarding source categories that would be subject to Section 112(j) as of March 6, 2002. Please ensure that you consult EPA's website for the most current listing of Section 112(j) subject source categories prior to filing the Part 1 Application. EPA's website is located at [www.epa.gov/ttn](http://www.epa.gov/ttn). You can obtain more information regarding the scope of the source categories listed below on EPA's website, <http://www.epa.gov/ttn/atw/112j/info/112j-table2.html>. EPA is expected to issue a list of categories for which Part 1 Applications will be required close to May 15, 2002. That list should be consulted and compared with the list below to determine if any categories have been added to or removed from the list.

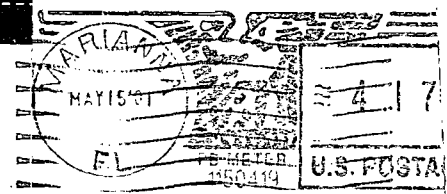
Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Combustion Turbines		
Engine Test Facilities and Rocket Testing Facilities		
Boilers and Process Heaters <ul style="list-style-type: none"> <li>▪ Industrial Boilers</li> <li>▪ Institutional/Commercial Boilers</li> <li>▪ Process Heaters</li> </ul>		
Lightweight Aggregate		
Reciprocating Internal Combustion Engines		
Primary Copper Smelting		
Primary Magnesium Refining		
Coke Ovens: Pushing, Quenching and Battery Stacks		
Integrated Iron and Steel Manufacturing		
Iron Foundries		
Steel Foundries		
Asphalt Roofing Manufacturing and Asphalt Processing		
Asphalt/Coal Tar Application to Metal Pipes (subsumed with Misc. Metal Parts & Products)		
Brick and Structural Clay Products Manufacturing/Clay Minerals Processing		
Lime Manufacturing		
Refractories Manufacturing (formerly Chromium Refractories)		

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
▪ Quaternary Ammonium Compounds Production		
Polyvinyl Chloride and Copolymers Production		
Reinforced Plastic Composites Production		
Generic MACT Categories Carbon Black Production Spandex Production Cyanide Chemicals Manufacturing Ethylene Processes		
Mercury Cell Chlor-Alkali Plants (Formerly Chlorine Production)		
Hydrochloric Acid Production and Fumed Silica Production		
Flexible Polyurethane Foam Fabrication Operations		
Friction Materials Manufacturing		
Miscellaneous Viscose Processes		
Paint Stripping Operations		
Plywood and Composite Wood Products (formerly Plywood and Particle Board Manufacturing)	<b>X</b>	<b>Softwood dimensional lumber drying kilns</b>
Rubber Tire Manufacturing		
Semiconductor Manufacturing		
Wet-Formed Fiberglass Mat Production		

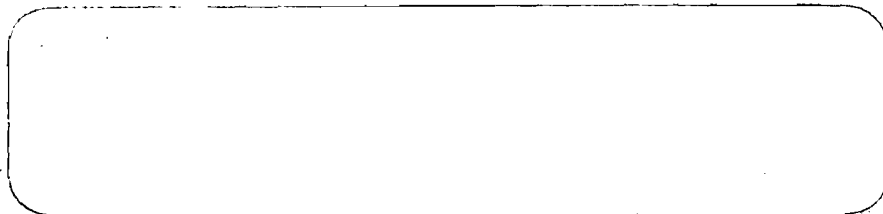


LOUISIANA-PACIFIC CORP  
6112 OLD SPANISH TRAIL  
MARIANNA, FL 32448

**CERTIFIED MAIL**



7001 1140 0000 1476 3405



33395+2400





# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

June 14, 2002

Mr. Don Gabriel  
Plant Manager  
Louisiana-Pacific Corporation  
6112 Old Spanish Trail  
Marianna, FL 32448

Re: Requests for Determination of MACT Applicability for the following facilities:  
West Bay Sawmill  
Marianna Sawmill

Dear Mr. Gabriel:

In response to your letters dated May 15, 2002 which request that the Department make a determination of MACT applicability for each of the referenced facilities, I have attached Chapter 28-105, F.A.C., Declaratory Statements, which specifies the procedure that you must follow in order for us to comply with your requests.

The Department's Agency Clerk is Kathy Carter. Her address is:

Kathy Carter, Agency Clerk  
Florida Department of Environmental Protection  
MS 35  
3900 Commonwealth Boulevard  
Tallahassee FL 32399-3000

Thank you for submitting the 112(j) notification information. Your information submittals appear to meet our current 112(j) requirements.

Please be aware that, although your letters refer to each of these information submittals as an "application," the Department does not recognize your submittals as state permit applications and has no plans to process them as such.

No further 112(j) information is needed from you at this time. If you have any questions, concerning this matter, please contact me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.  
Bureau of Air Regulation

attachment

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## CHAPTER 28-105, F.A.C.

### DECLARATORY STATEMENTS

#### 28-105.001 Purpose and Use of Declaratory Statement.

A declaratory statement is a means for resolving a controversy or answering questions or doubts concerning the applicability of statutory provisions, rules, or orders over which the agency has authority. A petition for declaratory statement may be used only to resolve questions or doubts as to how the statutes, rules, or orders may apply to the petitioner's particular circumstances. A declaratory statement is not the appropriate means for determining the conduct of another person or for obtaining a policy statement of general applicability from an agency. A petition for declaratory statement must describe the potential impact of statutes, rules, or orders upon the petitioner's interests.

#### 28-105.002 The Petition.

A petition seeking a declaratory statement shall be filed with the clerk of agency that has the authority to interpret the statute, rule, or order at issue and shall provide the following information:

(1) The caption shall read:

Petition for Declaratory Statement

Before (Name of Agency)

(2) The name, address, telephone number, and any facsimile number of the petitioner.

(3) The name, address, telephone number, and any facsimile number of the attorney or qualified representative (if any) of the petitioner.

(4) The statutory provision(s), agency rule(s), or agency order(s) on which the declaratory statement is sought.

(5) A description of how the statutes, rules, or orders may substantially affect the petitioner in the petitioner's particular set of circumstances.

(6) The signature of the petitioner or of the petitioner's attorney or qualified representative.

(7) The date.

#### 28-105.003 Agency Disposition.

The agency may hold a hearing to consider a petition for declaratory statement. If the agency is headed by a collegial body, it shall take action on a petition for declaratory statement only at a duly noticed public meeting. If a hearing is held, it shall be conducted in accordance with Sections 120.569 and 120.57(2), F.S. The agency may rely on the statements of fact set out in the petition without taking any position with regard to the validity of the facts. Within 90 days of the filing of the petition, the agency shall render a final order denying the petition or issuing a declaratory statement.