



Georgia-Pacific Wood Products LLC

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BUREAU OF AIR REGULATION

Georgia-Pacific Hosford OSB
12995 Highway 65 North
Hosford, FL 32334
Telephone: (850) 379-4000

Certified Mail-Return Receipt Requested #7008 2810 0000 9991 6712

June 28, 2011

Mr. Jeff Koerner
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

**RE: Georgia-Pacific Wood Products LLC – Hosford, FL OSB
Facility ID: 0770010
Title V Air Operating Permit Number: 0770010-003-AV
Construction Waiver Request – Automatic Overlay Cutter**

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Dear Mr. Koerner:

Georgia-Pacific Wood Products LLC (GP) is requesting an exemption from the requirement to obtain an air construction permit for a proposed automatic overlay cutting system on Emission Unit 013 (EU013) at our Oriented Strand Board (OSB) facility located in Hosford, FL. As described below, the project is to install a non-emitting unit that is not subject to any emission standard or work practice and is eligible for a permit exemption under FAC 62-210.300(3)(b)(1).

At present, EU013 includes: the staging of individual OSB panels, application of adhesive, layup of overlay material from a continuous sheet (e.g., foil, paper, etc.), lamination of the panels and then trimming of overlay material to the panel edges. The process for trimming the overlay material is currently performed manually by two operators. The proposed project is to install a machine that makes the same cuts without the use of the operators.

The overlay line as it currently exists has a capacity to process 28,800 square feet/hr (sf/hr) (120 feet per minute) of overlay panels¹, and is limited by board production. As the project is to create a safer cutting system and does not affect board production, the project will not increase the potential annual emission rates of the emissions unit.

GP estimated the change in actual annual emissions using the difference between the baseline actual emissions (defined by 40 CFR 52.21(b)(48)(ii)) and the projected actual emissions (defined by 40 CFR 52.21(b)(41)(i)). The projected actual production rate and baseline actual rates are 40.9 MMsf/yr and 10.2 MMsf/yr from 2010, respectively. The difference in production is 30.8 MMsf/yr.

From our April 2007 notice to FDEP specifying adhesive properties we use in this process, the following emission factors were presented:

VOC = 0.000047 lbs/sf

Acetaldehyde = 0.00000937 lbs/sf

Vinyl Acetate = 0.0000187 lbs/sf

¹ See facility description in 0770010-005-AC, air construction permit for the Overlay Line

Formaldehyde = 0.00000469 lbs/sf

Methanol = 0.00000234 lbs/sf

Using these emission factors and a rate of 30.8 MMsf/yr, the actual emission increases would be equal to:

Pollutant	Application	Emissions	
	Rate (lbs/sf)	lbs/yr	tons/yr
Acetaldehyde	0.00000937	288.60	0.14
Vinyl Acetate	0.00001875	577.50	0.29
Formaldehyde	0.00000468	144.14	0.07
Methanol	0.00000234	72.07	0.04
Total HAP		1082.31	0.54
VOC	0.000047	1447.60	0.72

These emission increases are below the permitting thresholds specified in 62-210.300(3)(b)(1)b of 5 tons per year for VOC, 2500 lbs/yr total HAP, and 1000 lbs/yr individual HAP.

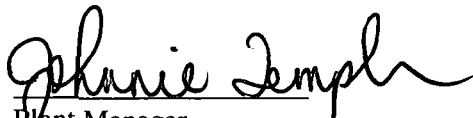
The proposed project will not add any additional pollutants.

As the proposed project for an automatic cutter has no direct emissions or applicable requirements and the change in actual emissions is less than the permitting thresholds, GP believes this equipment is exempt from construction permitting by 62-210.300(3)(b)(1).

GP respectfully requests the Department's concurrence that this project is exempt from the requirement to obtain an air construction permit. Thank you very much for your review of this letter and if you need any additional information, please do not hesitate to contact me at 850-379-4011 or Eric Chang, Regional Environmental Manager, at 404-652-5203.

Certification by Responsible Official: Based on information and belief formed after responsible inquiry, the statements and information in this document are believed to be true, accurate and complete.

Sincerely,



Plant Manager
Johnnie Temples

Cc: Debbie Moore/FDEP Pensacola
Mark J. Aguilar, P.E./GP Atlanta
Eric Chang/GP Atlanta
Kris Waikins/GP Hosford

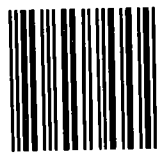
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