

Z 094 212 816

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Mr. Ronald L. Paul	
Street & Number 133 Peachtree Street	
Post Office, State, & ZIP Code Atlanta, Georgia 30303	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date 2/18/00  
 DEP File No. 0770010-001-AC  
 (PSD-FL-282)  
 Proposed Hosford OSB Plant

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

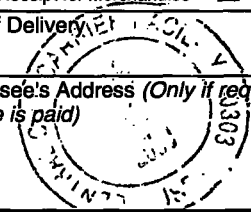
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. Ronald L. Paul Exec. V.P., Wood Products and Distribution 133 Peachtree Street Atlanta, Georgia 30303	4a. Article Number Z 094 212 816
5. Received By: (Print Name)	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
	7. Date of Delivery
6. Signature: (Addressee or Agent) X Pam Rome	8. Addressee's Address (Only if requested and fee is paid)



PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

PS Form 3800, April 1995

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION - TITLE V  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RECEIVED

FEB 24 2000

BUREAU OF AIR REGULATION

1



PS Form 3800, April 1995 (Reverse)

Stick postage stamps to article to cover First-Class postage, certified mail fee, and charges for any selected optional services (See front).

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached, and present the article at a post office service window or hand it to your rural carrier (no extra charge).
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach, and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make an inquiry.

102595-97-B-0145



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

February 18, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ronald L. Paul  
Exec. V. P., Wood Products and Distribution  
Georgia-Pacific Corporation  
133 Peachtree St.  
Atlanta, Georgia 30303

Re: Request for Additional Information – Case-by-case MACT Information  
DEP File No. 0770010-001-AC (PSD-FL-282)  
Proposed Hosford OSB Plant

Dear Mr. Paul:

On January 21, 2000 the Department received your application and complete fee for an air construction/PSD permit for a proposed new OSB plant near Hosford, Florida. We are processing your application, but it is incomplete. In order to continue our review, in addition to the information requested by Joseph Kahn of the New Source Review Section, we will need the following information related to the case-by-case MACT determination. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The application states that "The proposed BACT for the dryers and press (see Section 8), regenerative thermal oxidation, satisfies the 112(g) MACT requirement for formaldehyde from these sources." Since a MACT must be proposed by the applicant in accordance with 40 CFR 63.43(e), see attachment, it is assumed that what this statement means is that the applicant wants the proposed BACT to also be considered as the proposed MACT.

Please review the attachment, "What Information is Needed from the Applicant for a Case-by-Case MACT Determination?" and supply the missing information.

2. In addition to formaldehyde, what other hazardous air pollutants (HAPs) will be emitted from the facility? What will be the potential plantwide emissions of total hazardous air pollutants per year?
3. What events will require the use of the emergency exhausts shown in Figure 3-4a, Process Flow Diagram? How often are these events expected to occur, and of what duration are these events expected to be?
4. In which document did you find SCC 30701001, Flake Dryer, and SCC 30701053, Press Operation?
5. A quick scan of EPA data shows possible VOC removal efficiency of 95% for waferboard dryer (SCC 30700704), and 99% for particleboard drying (SCC 30700703). Please explain why these would not be the best controlled similar sources for MACT purposes.

The Department will continue its review after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Ronald L. Paul  
Georgia-Pacific Corporation  
Page 2 of 2  
February 18, 2000

If there are any questions, please call me at 850/921-9534 or send email to [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us).

Sincerely,



Cindy L. Phillips, P.E.

Air Toxics Unit

Bureau of Air Regulation

attachment

cc: Mr. Gregg Worley, EPA  
Mr. Ed Middleswart, NWD

Mr. John Bunyak, NPS  
Mr. Mark Aguilar, P.E., Georgia-Pacific Corp.

## What Information is Needed from the Applicant for a Case-by-Case MACT Determination?

{REFERENCE: Federal Register / Vol. 61, No. 250 / Friday, December 27, 1996 / Rules and Regulations}

63.43 (d) Principles of MACT determinations. The following general principles shall govern preparation by the owner or operator of each permit application or other application requiring a case-by-case MACT determination concerning construction or reconstruction of a major source, and all subsequent review of and actions taken concerning such an application by the permitting authority:

(1) The MACT emission limitation or MACT requirements recommended by the applicant and approved by the permitting authority shall not be less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority.

(2) Based upon available information, as defined in this subpart, the MACT emission limitation and control technology (including any requirements under paragraph (d)(3) of this section) recommended by the applicant and approved by the permitting authority shall achieve the maximum degree of reduction in emissions of HAP which can be achieved by utilizing those control technologies that can be identified from the available information, taking into consideration the costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

(3) The applicant may recommend a specific design, equipment, work practice, or operational standard, or a combination thereof, and the permitting authority may approve such a standard if the permitting authority specifically determines that it is not feasible to prescribe or enforce an emission limitation under the criteria set forth in section 112(h)(2) of the Act.

(4) If the Administrator has either proposed a relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or adopted a presumptive MACT determination for the source category which includes the constructed or reconstructed major source, then the MACT requirements applied to the constructed or reconstructed major source shall have considered those MACT emission limitations and requirements of the proposed standard or presumptive MACT determination.

### (e) Application requirements for a case-by-case MACT determination.

(1) An application for a MACT determination (whether a permit application under title V of the Act, an application for a Notice of MACT Approval, or other document specified by the permitting authority under paragraph (c)(2)(ii) of this section) shall specify a control technology selected by the owner or operator that, if properly operated and maintained, will meet the MACT emission limitation or standard as determined according to the principles set forth in paragraph (d) of this section.

(2) In each instance where a constructed or reconstructed major source would require additional control technology or a change in control technology, the application for a MACT determination shall contain the following information:

(i) The name and address (physical location) of the major source to be constructed or reconstructed;

(ii) A brief description of the major source to be constructed or reconstructed and identification of any listed source category or categories in which it is included;

(iii) The expected commencement date for the construction or reconstruction of the major source;

- (iv) The expected completion date for construction or reconstruction of the major source;
- (v) the anticipated date of start-up for the constructed or reconstructed major source;
- (vi) The HAP emitted by the constructed or reconstructed major source, and the estimated emission rate for each such HAP, to the extent this information is needed by the permitting authority to determine MACT;
- (vii) Any federally enforceable emission limitations applicable to the constructed or reconstructed major source;
- (viii) The maximum and expected utilization of capacity of the constructed or reconstructed major source, and the associated uncontrolled emission rates for that source, to the extent this information is needed by the permitting authority to determine MACT;
- (ix) The controlled emissions for the constructed or reconstructed major source in tons/yr at expected and maximum utilization of capacity, to the extent this information is needed by the permitting authority to determine MACT;
- (x) A recommended emission limitation for the constructed or reconstructed major source consistent with the principles set forth in paragraph (d) of this section;
- (xi) The selected control technology to meet the recommended MACT emission limitation, including technical information on the design, operation, size, estimated control efficiency of the control technology (and the manufacturer's name, address, telephone number, and relevant specifications and drawings, if requested by the permitting authority);
- (xii) Supporting documentation including identification of alternative control technologies considered by the applicant to meet the emission limitation, and analysis of cost and non-air quality health environmental impacts or energy requirements for the selected control technology; and
- (xiii) Any other relevant information required pursuant to subpart A.

(3) In each instance where the owner or operator contends that a constructed or reconstructed major source will be in compliance, upon startup, with case-by-case MACT under this subpart without a change in control technology, the application for a MACT determination shall contain the following information:

- (i) The information described in paragraphs (e)(2)(i) through (e)(2)(x) of this section; and
- (ii) Documentation of the control technology in place.