



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FACSIMILE TRANSMITTAL SHEET

To	Jim Pennington - FDEP
Fax Number	(850) 921-9533
From	Jim Little Air Planning Branch, Air Permits Section Phone: (404) 562-9118 Fax: (404) 562-9019 E-mail: little.james@epa.gov
Subject	Georgia-Pacific Hosford
Date	October 29, 2004
Pages	4 (including this sheet)

We are also sending the letter by mail.



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OCT 29 2004

4APT-APS

Mr. James K. Pennington
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Pennington:

Thank you for sending the draft prevention of significant deterioration (PSD) permit (PSD-FL-282A) for the Georgia-Pacific (G-P) oriented strandboard manufacturing facility under construction near Hosford, Florida. We understand this permit to be a revision of the original PSD construction permit (PSD-FL-282) for the facility. The revision is needed to accommodate G-P's expectation of being able to achieve a higher production capacity than originally planned. Our comments on the draft revised PSD permit are as follows:

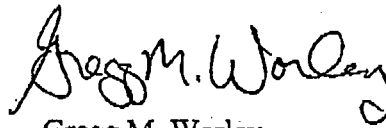
1. The table on page 3 of the draft permit shows the difference between the allowable emissions in the original permit and the new proposed allowable emissions. Showing this difference might imply that the change in production capacity is being treated as a modification and not as a re-issuance of permit for the entire project. We do not believe the Florida Department of Environmental Protection (FDEP) is actually viewing the change as a modification, but we wanted to make clear our position that what is happening is a re-issuance of a permit for the entire project. Please verify that the best available control technology evaluation and the air quality modeling assessment for the change are based on total allowable emissions and not on the change in allowable emissions.
2. In the draft permit conditions for the panel press, Emissions Unit No. 002, FDEP is allowing a switch from a regenerative thermal oxidizer (RTO) to a thermal catalytic oxidizer (TCO) without the need for a permit revision. This seems reasonable to us, but FDEP might consider adding a permit condition requiring G-P to notify FDEP at such time as a switch is made from an RTO to a TCO. Also, please verify that the permit monitoring requirements for compliance control parameters and operational status indicators are still appropriate if the switch is made from an RTO to a TCO. For example, measurement of static pressure might be a good indicator of potential plugging of the RTO media, but is it also an appropriate indicator of possible catalyst deactivation?

3. The draft permit allows excess emissions for two hours in a 24-hour period for startup and shutdown of the flake dryers (Emissions Unit 001), panel press (Emissions Unit 002), and thermal oil system electrostatic precipitator (ESP) bypass stack (Emissions Unit 010). (a) With regard to the thermal oil system, we are not sure why an excess emissions allowance is needed since the only emissions limit is a visible emissions limit and the permit requires operation of the ESP "at all times." We would be interested to know why operation of the ESP during startup and shutdown would not serve to achieve compliance with the visible emissions limit, thereby eliminating the need for an excess emissions allowance. (b) With regard to the flake dryers and panel press, we would be interested to know why the RTO's could not be activated prior to process startup and operated during process startup to eliminate the need for a startup excess emissions allowance for the pollutants controlled by the RTO's. Similarly, we would be interested to know why the RTO's could not be kept in operation during process shutdown until a process shutdown is completed.
4. The table on page 3 of the draft permit shows potential maximum emissions after the change in production capacity. These new potential maximum emissions are generally commensurate with the allowed increases in production capacity (based on a comparison of the new potential maximum emissions listed in the table with the "Current Allowable Emissions" listed in the table). However, potential maximum emissions of carbon monoxide (CO) do not fit this pattern. The listed Potential Maximum Emissions rate for CO is 755.8 tons per year (tpy), compared to the listed Current Allowable Emissions for CO of 179.1 tpy. Most of the potential CO emissions are from the oil heating system (529.5 tpy). We can not find a derivation of oil heating system CO emissions in the permit application.
5. We also have other concerns about emissions from the oil heating system. FDEP notes in the permit conditions for the oil heating system that potential emissions from wood firing in the oil heating system "are accounted for in the estimate for emissions unit 001" (the flake dryers). FDEP further notes that emissions during natural gas firing in the oil heating system will go directly to the atmosphere and that potential direct emissions are PM/PM₁₀ 0.5 tpy, NO_x 26.3 tpy, CO 23.6 tpy, VOC 1.3 tpy, and SO₂ 0.16 tpy. Our concerns are as follows. (a) There are no emissions limits for direct emissions from the oil heating system. (b) The CO limit for the flake dryers including emissions from the oil heating system during wood firing is equivalent to 40.4 tpy, and the stated direct emissions of CO from the oil heating system during natural gas firing is 23.6 tpy. These two numbers do not add up to anything close to the listed Potential Maximum Emissions for CO from the oil heating system of 529.5 tpy. Please provide information to help us understand CO emissions from the oil heating system.

6. In Condition II.6. of the draft permit, FDEP includes the usual provision that the construction permit is no longer valid "if construction is not completed within a reasonable time." Since FDEP issued the original permit for this project in 2000, does the "reasonable time" for construction completion include the time since original permit issuance or does the "reasonable time" clock start over with the proposed permit re-issuance?

If you have any questions concerning the comments in this letter, please call Jim Little at (404) 562-9118.

Sincerely,



Gregg M. Worley
Chief
Air Permits Section