Georgia-Pacific Wood Products LLC

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

February 23, 2010

CERTIFIED MAIL: 70062150000404974434

Mr. Jeff Koerner
Florida Department of Environmental Protection
New Source Review
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
Request to Modify Fuel Recordkeeping Requirements and Compliance Assurance Monitoring (CAM) Plan

Dear Mr. Koerner:

Georgia-Pacific Wood Products LLC (GP) Hosford OSB is requesting a modification to permit conditions in our existing Title V air permit that require daily monitoring of wood and natural gas fuel usage and a revision of our CAM Plan to harmonize requirements between the initial construction permit and the more recent federal Plywood & Composite Wood Product (PCWP) MACT standard (40 CFR 63 Subpart DDDD).

We discussed the daily fuel monitoring issue in a meeting in your office on July 1, 2009. In that meeting, the Department requested that GP submit an application to your office describing the change.

Fuel Recordkeeping Requirements

GP requests that the fuel recordkeeping requirements in our Title V permit be revised as described below.

1. Emission Unit 011 - Thermal Oil Heater: Section III.D of Title V permit:
As stated in the description of the unit in Section III.D of the permit, the Thermal Oil Heater-EU 011 (TOH) is subject to Subpart Dc when the unit exhausts directly to the atmosphere and not when the unit exhausts through the dryer. Therefore, the Subpart Dc recordkeeping requirement should apply only during those periods that the TOH exhausts directly to the atmosphere. GP described this recordkeeping requirement in our PSD application as follows:

> *"The key point in determining applicability of Subpart Dc is hinged upon the existence of intermixing of combustion gases and the heat transfer medium, as expressed clearly in*

> *US EPA's 1992 determination memorandum (see Attachment C). While it is true that the thermal oil will be indirectly heated, under normal operations the final combustion gases are intermixed and come into "direct" contact with the wood flake dryers' heat transfer medium. As such, the thermal oil system would not be subject to NSPS Subpart Dc under normal operating conditions.*
>
> *A possible exception is the case where the combustion gases from the thermal oil suspension burners exit through the ESP stack, as opposed to being routed to the dryers. In order to insure that the system meets the requirements when operating in bypass mode, an electrostatic precipitator and continuous opacity monitor will be installed. Also, daily records will be maintained of fuel usage as required under 40 CFR 60.48c(g)."*

Condition III.D.2 of the permit limits wood and natural gas firing, and Condition III.D.6 requires daily records of the fuel used, both on a 30-day rolling average basis. GP requests that the limits and recordkeeping requirement be modified to reflect the federal provision for monthly recordkeeping, instead of daily recordkeeping. We believe this request is supported by EPA Region 4's November 29, 2006 determination regarding the Department of the Army's base in Fort Benning, Georgia. EPA stated that since there are no applicable emission limits under 40 CFR part 60, subpart Dc for boilers that combust natural gas, EPA determined that compliance for these affected facilities can be adequately verified with monthly fuel usage records. Please see the attached EPA Region 4 determination titled "EPA Region 4 Alternative Fuel Usage Recordkeeping Proposal."

It is also supported by EPA's 2006 changes to Subpart Dc, 40 CFR 60.48, in which EPA added the following provision for monthly recordkeeping instead of daily recordkeeping:

> *40 CFR 60.48c(g)(2): As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.*

GP respectfully requests that Conditions III.D.2 and III.D.6 be revised accordingly to reflect changes in 40 CFR 60, Subpart Dc and EPA's determination as described above. In addition, GP respectfully requests that Condition III.D.9 be revised to reflect the appropriate applicability of 40 CFR 60.48c(g)(2).

2. Emission Units 001 & 002 - Five Flake Dryers with RTO & Panel Press With One RTO or TCO: Sections III.A and III.B of Title V permit:

These emission units consume the following fuels:

EU001 – Flake Dryers combust natural gas and wood. The flake dryers use natural gas to maintain a pilot light and during startup periods. The RTOs also use natural gas burners.

EU002 – Panel Press does not combust any fuel, while its RTO/TCO uses a natural gas burner.

The permit conditions require hourly fuel monitoring on a 30-day rolling average basis for wood and natural gas. The underlying applicable requirement is the BACT emission standards. Neither of these emission units is subject to the NSPS requirement for combustion devices.

The OSB plant processes are designed to use all available wood from the finishing areas and thereby minimize waste and purchased fuel. From our review of our actual gas usage, GP has determined that few 30-day periods include more than 3 days of any natural gas usage in the dryers. Thus, we believe the daily recordkeeping of only wood is appropriate. Natural gas usage is intermittent and most commonly in use during dryer start up or malfunction periods (e.g., the sanding and cutting systems are malfunctioning and do not generate sanderdust for the dryers to burn). We believe natural gas fuel use record keeping is unnecessary to ensure compliance with the BACT limits. Nitrogen oxide emissions generated by the flake dryer use of natural gas are regulated at the RTOs (BACT determination).

In contrast to the dryers, the RTOs and RTO/TCO themselves continuously use natural gas to meet the temperature requirements which assure destruction of volatile organic compounds. As the RTO and TCO/RTO are otherwise required to monitor temperature continuously, GP believes the tracking of a 30-day rolling average for fuel use is unnecessary to assure proper operating of the control device and destruction of VOC, CO and PM. NOx is not regulated by 40 CFR Part 64 (Compliance Assurance Monitoring).

GP respectfully requests removal of the 30-day rolling average basis and recordkeeping of natural gas usage requirement in the respective permit conditions for the dryers and the RTOs and RTO/TCO. We request to retain the current recordkeeping requirements for wood combustion in the dryers.

These permit conditions are reflected in Conditions III.A.2, III.A.4, and III.B.3, which limits wood and natural gas firing to 30-day rolling averages, and Conditions III.A.12, III.A.13, and III.B.11, which require daily records of the fuel used on a 30-day rolling average basis.

Revision of CAM Plan to Harmonize with PCWP MACT Continuous Parameter Monitoring

As a separate issue, during 2009, the facility submitted an application to the regional district office to amend the Title V permit to incorporate all requirements of the PCWP MACT Standard. The PCWP MACT Standard includes emission limits, work practices and monitoring requirements for our Regenerative Thermal Oxidizers (RTOs) and Thermal/Regenerative Catalytic Oxidizer (TCO/RCO). On February 2, 2010, the facility submitted a response to an FDEP Request for Additional Information (RAI) that further clarifies the incorporation of PCWP MACT into the Title V air permit (Application 2209-2). Our submittal to your office today is to further reconcile differences in the original CAM Plan included in the initial construction permits for the facility.

There are several compliance requirements in PCWP MACT that overlap with Hosford OSB's current CAM Plan. Though the CAM Plan and PCWP MACT address VOC and HAP (with THC as its surrogate) emissions, respectively, the compliance requirements are nearly identical. For

example, the current CAM Plan requires documentation of RTO/TCO chamber temperature on a 12-hour rolling average basis for EU 001 and EU 002. However, in PCWP MACT, RTO/TCO chamber temperature is required to be documented on a 3-hour block average (Table 2, Operating Requirements, 40 CFR 63, Subpart DDDD), which is a stricter compliance averaging period.

In addition, when Hosford OSB conducts performance stack tests, the facility must ensure compliance with both Title V permit limits [PM/PM_{10}, NO_X, CO, VOC, VE] and PCWP MACT compliance options [e.g., 90% reduction of total HAP, measured as THC (as carbon)]. These stack tests determine the minimum firebox temperature that the RTOs/TCO must be operated at in order to meet both the Title V CAM Plan and the PCWP MACT compliance option. Operating at two different temperatures to meet the minimum temperature requirements in both the CAM plan and PCWP rule, however, would be virtually impossible. We believe it is sufficient to meet the requirements of the PCWP rule and Title V with one temperature. To demonstrate that we are consistently below our mass emission limits during stack tests, we have attached is a stack test summary presenting destruction efficiency and firebox temperature.

PCWP MACT also contains additional requirements that are not addressed in the current CAM Plan. For example, PCWP MACT requires that process units using a catalytic oxidizer (TCO), check the activity level of the catalyst every 12 months.

G-P requests that the CAM Plan be revised and the PCWP MACT requirements be incorporated into the current Title V operation permit. Our intent is to clarify or eliminate certain compliance requirements that are redundant with or contrary to the PCWP MACT requirements. G-P has included a recommended revised CAM Plan with this application.

G-P appreciates your assistance on this project. If you have any questions regarding these requests, please contact Mark Aguilar at (404) 652-4293 or Eric Chang 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 true, accurate and complete.*

Sincerely,

Johnnie Temples
Plant Manager

Attachments

Cc: Debbie Moore/FDEP Pensacola
Kris Waikins/G-P Hosford OSB
Eric Chang/G-P Atlanta
Mark Aguilar, P.E./G-P Atlanta

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Georgia-Pacific Wood Products, LLC	
2. Site Name: Georgia-Pacific Wood Products, LLC, Hosford OSB	
3. Facility Identification Number: 0770010	
4. Facility Location... Street Address or Other Locator: 12995 HWY 65 N.E., P.O. Box 322 City: Hosford County: Liberty Zip Code: 32334-0322	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: Eric Chang
2. Application Contact Mailing Address... Organization/Firm: Georgia-Pacific Wood Products, LLC Street Address: 133 Peachtree St., N.E., 8th Floor City: Atlanta State: GA Zip Code: 30303
3. Application Contact Telephone Numbers... Telephone: (404) 652 - 5203 ext. Fax: (404) 654 - 1046
4. Application Contact E-mail Address: Eric.Chang@gapac.com

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

☐ Air construction permit.

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

☐ Initial Title V air operation permit.

☐ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☒ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☒ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Re-evaluation of fuel recordkeeping requirements and revise CAM Plan.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
EU 001	Five (5) flake dryers w/ two (2) RTOs		
EU 002	Panel press w/ one RTO or TCO		
EU 011	Thermal oil system ESP (bypass stack)		

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Johnnie Temples

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: Georgia-Pacific Wood Products LLC, Hosford OSB
   Street Address: 12995 HWY 65 N.E., P.O. Box 322
   City: Hosford State: FL Zip Code: 32334

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: (850) 379 - 4000 ext. 4011 Fax: (850) 379 - 4095

4. Owner/Authorized Representative E-mail Address: jrtemple@gapac.com

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.

Johnnie Temples — Signature

2/22/2010 — Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Johnnie Temples

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   [X] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   [ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   [ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   [ ] The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: Georgia-Pacific Wood Products LLC, Hosford OSB
   Street Address: 12995 HWY 65 N.E., P.O. Box 322
   City: Hosford State: FL Zip Code: 32334

4. Application Responsible Official Telephone Numbers...
   Telephone: (850) 379 - 4000 ext. 4011 Fax: (850) 379 - 4095

5. Application Responsible Official E-mail Address: jrtemple@gapac.com

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Johnnie Temples — Signature

2/02/2010 — Date

Professional Engineer Certification

1. Professional Engineer Name: Mark Aguilar
   Registration Number: 52248
2. Professional Engineer Mailing Address...
   Organization/Firm: Georgia-Pacific LLC
   Street Address: 133 Peachtree St., N.E., 9th Floor
   City: Atlanta State: GA Zip Code: 30303
3. Professional Engineer Telephone Numbers...
   Telephone: (404) 652 - 4293 ext. Fax: (404) 232 - 4310
4. Professional Engineer E-mail Address: mjaguila@gapac.com
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 2-1-2010 Date

(seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 16 East (km) 713.5 North (km) 3369.5		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30/26/25 Longitude (DD/MM/SS) 84/45/16	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 24	6. Facility SIC(s): 2493
7. Facility Comment : Facility started production on April 20, 2005			

Facility Contact

1. Facility Contact Name: Johnnie Temples
2. Facility Contact Mailing Address... Organization/Firm: Georgia-Pacific Wood Products LLC, Hosford OSB Street Address: 12995 HWY 65 NE, P.O. Box 322 City: Hosford State: FL Zip Code: 32334
3. Facility Contact Telephone Numbers: Telephone: (850) 379 - 4000 ext.4011 Fax: (850) 379 - 4095
4. Facility Contact E-mail Address: jrtemple@gapac.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official E-mail Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. [x] Title V Source	
4. [x] Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. [x] Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. [x] One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. [x] One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Carbon Monoxide	A	N
Acetaldehyde	A	N
Formaldehyde	A	N
Methanol	A	N
Vinyl Acetate	A	N
Total Hazardous Air Pollutants	A	N
Nitrogen Oxides	A	N
Particulate Matter - Total	A	N
Particulate Matter – PM10	A	N
Sulfur Dioxide	A	N
Vinyl Acetate Monomer	A	N
Volatile Organic Compounds	A	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: 3/12/2009
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: 2/2/2010
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: 7/16/2004

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☐ Attached, Document ID:_____ ☒ Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): ☐ Attached, Document ID:_____
3. Rule Applicability Analysis: ☒ Attached, Document ID: See Cover Letter
4. List of Exempt Emissions Units: ☐ Attached, Document ID:_____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: ☐ Attached, Document ID:_____ ☒ Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
   ☐ Attached, Document ID:_____ [x] Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
   ☐ Attached, Document ID:_____ [x] Not Applicable (revision application)

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
   [x] Attached, Document ID: See Cover Letter
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
   ☐ Attached, Document ID:_____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities Onsite but Not Required to be Individually Listed
   [x] Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____ [x] Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   [x] Attached, Document ID: See Cover Letter ☐ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

   Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not an Acid Rain source)

   Phase II NO_X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

   New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

Source Test Summary Attached
Proposed Compliance Assurance Monitoring Plan revisions attached

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

GEORGIA-PACIFIC WOOD PRODUCTS LLC - HOSFORD OSB PLANT
COMPLIANCE ASSURANCE MONITORING PLAN

Applicability

In order for the CAM Rule to apply to a specific emission unit/pollutant, the following, four criteria must be met:

1) The emission unit must be located at a major source for which a Part 70 or Part 71 permit is required.

2) The emission unit must be subject to an emission limitation or standard.

3) The emission unit must use a control device to achieve compliance.

4) The emission unit must have potential, pre-controlled emissions of the pollutant of at least 100 percent of the major source threshold.

Table 1 summarizes the potential uncontrolled and controlled emissions for each of the emission units at the Hosford OSB Plant that use a control device.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

Table 1. Hosford OSB Plant Source with Control Equipment - Uncontrolled and Controlled Emission Levels (tons per year)

Emission Source	Emission Point Number	Control Device	TSP		PM10		VOC		HAPs		CO	
			Pre	Post	Pre	Post	Pre	Post	Pre	Post	Pre	Post
Five Flake Dryers	EU 001	2-RTO	>100	187	>100	187.0	>100	349.1	HCHO; 140.53	14.05	743.6	185.9
Panel Press	EU 002	RTO/TCO	36 per AP-42	15.77	36 per AP-42	15.77	>100	55.3	Methanol =150; AP-42	14.34	161.6	40.4
Screen Fines	EU 003	Baghouse Receiver	>100	11.62	>100	11.62						
Saw Trim	EU 004	Baghouse Receiver	>100	5.89	>100	5.89						
Mat reject	EU 005	Baghouse Receiver	>100	10.01	>100	10.01						
Specialty Saw	EU 006	Baghouse Receiver	>100	9.87	>100	9.87						
Fuel System	EU 007	Baghouse Receiver	>100	1.87	>100	1.87						
Forming Bins	EU 008	Baghouse Receiver	>100	8.61	>100	8.61						
Hammermill System	EU 009	Baghouse Receiver	>100	11.6	>100	11.6						
Thermal Oil Heater - Wood fired with ESP	EU 011	ESP	>100	35	>100	35						
Thermal Oil Heater - Gas Fired	No Control	CAM Not Required										
Major Source Threshold			100		100			100		25		100

Notes: RTO = Regenerative thermal oxidizer; ESP = Electrostatic precipitator; TCO= Thermal Catalytic Oxidizer; System can operate in the catalytic mode (<1200 F) or regenerative mode (>1500 F).
Pre = Pre-controlled emissions; Post = Post-controlled emissions
Baghouses – Pre-control Emissions are based on 99.9% control directed through a receiver baghouse.
Veneer Dryers (RTO) – Pre-control PM emissions reflect AP-42 for uncontrolled dryers. Post-control emissions are based on permit limits.
Veneer Dryers (RTO) – Pre-control HAPs and VOCs are based on AP-42. Post-control emissions are based on Permit Limits.
Baghouses are inherent to the process and therefore exempt from CAM requirements.
HAP emissions are regulated by 40 CFR 63 Subpart DDDD; other pollutants are regulated by BACT.

As a result of the applicability criteria listed above, the following emission units/pollutants will be subject to CAM.

EU001 Five Flake Dryers with two regenerative thermal oxidizers (RTO) – PM/PM10, Volatile organic compounds (VOCs), Carbon Monoxide (CO)

EU002 Panel Press with RTO/TCO - VOC, CO, PM/PM10

EU011 Thermal Oil Heater with ESP - PM

In contrast, EU003-EU009 Screen Fines, Saw Trim, Mat Reject, Specialty Saw, Fuel System pneumatic system, Forming bins, and Hammermill system and their respective Baghouses are inherent process equipment; therefore, CAM does not apply.

Components of CAM Plan

The CAM Rule contains the following submittal requirements:

40 CFR 64.4(a)	Information on indicators, including indicator ranges or a description of the process by which indicators are to be established and a discussion of performance criteria for the monitoring
40 CFR 64.4(b)	Justification for the proposed elements of the monitoring
40 CFR 64.4(c)	Control device operating data recorded during performance test, supplemented by engineering assessments or manufacturer's recommendations to justify the proposed indicator range
40 CFR 64.4(d)	Test plan and schedule for obtaining data, if performance test data are not available. -NOT APPLICABLE
40 CFR 64.4(e)	Implementation plan, if monitoring requires installation, test or other activities prior to implementation. –NOT APPLICABLE

The following sections address these requirements for the Flake Dryers, Presses, and Thermal Oil fired with wood and controlled by RTO, RTO/TCO, and ESP, respectively.

CAM FOR VOCs, PM/PM10, and CO FROM THE FIVE FLAKE DRYERS/RTOs (EU 001)

A. Monitoring Approach (40 CFR 64.4(a))

1. Compliance Control Parameters

Georgia-Pacific Wood Products LLC (G-P) proposes to monitor one key parameter to show compliance with the limitations on VOCs, CO, and PM/PM10. The permit contains a VOC limit of 79.7 lbs/hour, a CO limit of 42.4 lbs/hr, and a PM/PM10 limit of 42.7 lbs/hour. In order to demonstrate continuous compliance with these requirements, G-P determined the appropriate parameter to monitor is RTO retention chamber temperature. The parameter is controlled, monitored, and recorded continuously at the RTO Control Center.

VOC, CO, and PM/PM10 emissions are destroyed based on a minimum operating temperature in the RTO. Based on testing at Hosford, G-P demonstrated compliance with permitted limits and established a minimum temperature. However, the minimum temperature can be re-established in accordance with the requirements of 40 CFR 63.2262(k). Thus, CAM does not define a specific temperature value.

2. Operational Status Indicators

Operational status of the RTO, the temperature gauges, and the isolation damper positions are constantly monitored by the dryer operator. The RTO control system features audible and visual alarms to alert the operator of a malfunction in RTO operations. These alarms remain active until the proper corrective action is taken. If deficiencies in the performance of the parametric monitoring system occur, corrective action(s) will be taken. Anytime the temperature indicators read below the minimum temperature that has been established in accordance with the requirements of 40 CFR 63.2262(k), the RTO operations are checked for excursions.

If there is a problem with either of the two RTOs that result in one RTO being taken off-line, the isolation damper for the problem RTO will close, re-route the air to the other RTO and shut down dryers for the problem RTO. A closed damper is an indicator to investigate an issue with the problem RTO.

3. Monitoring Location and Averaging Period

The RTO chamber temperature is based on the average reading of thermocouples located in the retention chamber. The continuous readings are recorded and documented every 15 minutes. A 3-hour block average is also documented. The isolation damper positions are also monitored continuously to document a change in position from open to closed (or vice versa).

4. Recording and Recordkeeping

The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters (temperature) and operational status indicators (isolation damper). Recordkeeping and reporting of these parameters is managed using a relational database (such as Wonderware's Industrial SQL Server Software). The unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.

5. Testing and Implementation Schedule

Stack testing for emission limits is performed as required by the current air operating permit.

6. Quality Assurance/Quality Control

40 CFR 63 Subpart DDDD requires the facility maintain a Quality Control Program for Continuous Monitoring System in accordance with 40 CFR 63.8. G-P has developed and implemented a maintenance schedule which includes monthly, quarterly, semi-annual and annual maintenance activities recommended by the equipment manufacturer and/or determined by Georgia-Pacific to be necessary. The maintenance tasks will assure that the RTO and data acquisition systems are being maintained as per the manufacturer's recommendations, which have been developed to enhance the reliability of the equipment and minimize the possibility of malfunction of the systems due to a preventable failure.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

	Proposed CAM EU001	<Existing CAM>
I. Indicator	1. Temperature of RTO retention chamber 2. Isolation Damper	1. Temperature of RTO retention chamber 2. Isolation Damper
Measurement Approach	1. Measure each RTO chamber temperature using thermocouples located in each retention chamber. A 3-hour block average of all the thermocouples shall be documented every 15 minutes. 2. Monitor isolation damper position as open or closed	1. Measure each RTO chamber temperature using eight thermocouples located in each retention chamber. A 12-hour rolling average of all the thermocouples shall be documented every 15 minutes. 2. Monitor damper position as open or closed
II. Indicator Range	1. Any 3-hour block average minimum firebox (retention chamber) temperature reading below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262(k) is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary. 2. Any isolation damper closing is investigated.	1. Any 12-hour rolling average reading for all of the RTO thermocouples below 1492°F is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary. 2. Any damper closed for more than one hour is an excursion.
III. Performance Criteria		
A. Data Representativeness	Minimum firebox temperature will be determined in accordance with the requirements of 40 CFR 63.2262(k).	The data for determining the minimum operating temperature was developed from the onsite stack tests taken in August 2005 and May 2006.
B. Verification of Operational Status	1. Operational status of the RTO, the temperature gauges, and the isolation dampers are monitored each shift by the dryer operator. A parametric monitoring report is reviewed twice each week that summarizes the operating conditions of the RTO including the temperature and isolation damper position. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO. A visual alarm is triggered when an isolation damper closes.	1. Operational status of the RTO, the temperature gauges, and the isolation dampers are monitored each shift by the dryer operator. A parametric monitoring report is printed and reviewed twice each week that summarizes the operating conditions of the RTO including the temperature and damper position. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO. A visual alarm is triggered when a damper is closed.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

	Proposed CAM EU001	<Existing CAM>
C. QA/QC Practices and Criteria (40 CFR 63.2269 (b))	1. Semiannually, the thermocouples are replaced with new units[1] or its accuracy verified with a redundant temperature sensor. 2. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating range or install a new temperature sensor. 3. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. 4. For isolation dampers, monthly checks are done to confirm that the limit (proximity) switches are responding properly to damper position (i.e., confirming dampers in the fully open or fully closed position as appropriate).	1. Weekly printed report review. 2. Calibrate the temperature thermocouple sensors annually. Annually, the thermocouples will be calibrated and certified by the company who performs the calibration to verify that the readings are within a +/- 0.75% level of accuracy according to the standard established in ASTM E230. 3. Calibrate the damper location by visual check and documentation on a monthly basis. 4. Maintenance schedule of monthly, quarterly and annual activities. 5. Audible and visual alarms are checked annually during annual maintenance down periods.
D. Monitoring Frequency (40 CFR 63.2270)	Temperature is measured continuously, averaged and recorded every 15 minutes with a block average for each 3-hour period.	Temperature is measured continuously, averaged and recorded every 15 minutes with a rolling average for each 12-hour period.
E. Data Collection Procedures	The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters (temperature) and operational status indicators (isolation damper). Record keeping and reporting of the parameters are managed using a dedicated computer equipped with a relational database. Additionally, the unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.	The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Record keeping and reporting of the parameters are managed using a dedicated computer equipped with a relational database. Additionally, the unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.

[1] Georgia-Pacific interprets that installing a new temperature sensor rather than calibrating the existing unit eliminates the need for redundant temperature monitoring as stated in 63.2269(b)(4). This interpretation is taken from 63.2269(b)(5) which, when the maximum temperature is exceeded, requires calibration or validation or installation of a new sensor.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

	Proposed CAM EU001	<Existing CAM>
F. Averaging period (40 CFR 63.2270)	1. Temperature readings are documented every 15 minutes. The data is then averaged over a block 3-hour period. The 3-hour block average is the value used to verify compliance with the minimum firebox temperature. 2. Isolation Damper position is monitored continuously.	Temperature readings are documented every 15 minutes, from data collected every 10 seconds. The data is then averaged over a rolling 12 hour period. The 12 hour rolling average is the value used to verify the RTO is operating above a minimum of 1492 degrees F. Damper position is measured continuously.

B. Dryer RTO Monitoring Approach Justification (40 CFR 64.4(b))

1. Background

The emissions unit (EU) consists of the five flake dryers. The dryers operate continuously when the plant is in normal operation. Airflow is ducted from five dryers to a pressure equalization chamber and then to two RTOs. VOC, CO, and PM/PM10 are burned in the retention chambers, then the exhaust gases are vented to the atmosphere.

2. Rationale for Selection of Performance Indicators

An RTO is used to reduce VOC, CO and PM/PM10 emissions from the manufacturing process. Emissions from five dryers are ducted to two RTOs. The wood flake drying process is a continuous operation, but the production rate may vary slightly with the type of product produced. The fraction of VOCs, PM/PM10, and CO that combusts increases with rising temperature. To comply with the applicable emission limits, the minimum temperature established in accordance with the requirements of 40 CFR 63.2262(k) must be maintained.

Isolation damper position was chosen as an indicator because it indicates the RTOs are receiving the exhaust from the dryers, there are no bypasses, and there is an isolation damper for each RTO. When an RTO goes off-line, the isolation damper for that RTO is activated and goes to the closed position. No more than three of the five dryers are automatically routed to the RTO that is on-line. Other dryers will be taken off-line.

3. Rationale for Selection of Indicator Range

The value for the performance indicator is based on stack tests done on the RTO. The facility may re-test in accordance with 40 CFR 63 Subpart DDDD to re-establish a minimum firebox temperature. Pollutant destruction increases with increasing retention chamber temperature, so a maximum temperature limit is not necessary.

C. Control Device Operating Data Recorded During Performance Test (40 CFR 64.4(c))

Summary of the compliance test for both RTOs performed on August 30 and 31, 2005:
CO = 10.37 lb/hr
PM/PM10 = 9.53 lb/hr
VOC = 4.35 lb/hr

CAM FOR VOCs, CO, and PM/PM10 FROM THE PRESS RTO/TCO (EU 002)

A. Monitoring Approach (40 CFR 64.4(a))

1. Compliance Control Parameter

In order to prove continuous compliance with the VOC (12.6 lb/hr), CO (9.2 lb/hr), and PM/PM10 (3.6 lb/hr) limits, G-P proposes to monitor RTO/TCO retention chamber temperature. The retention chamber temperature will be set, monitored, and recorded continuously at the RTO/TCO Control Center.

VOC emissions are destroyed based on a minimum operating temperature in the RTO/TCO. Based on compliance testing at the Hosford OSB facility, G-P demonstrated compliance with permitted limits and established a minimum temperature. However, the minimum temperature can be re-established in accordance with the requirements of 40 CFR 63.2262(k). Thus, CAM does not define a specific temperature value.

2. Operational Status Indicators

The RTO/TCO control system features audible and visual alarms to alert personnel of a malfunction in RTO/TCO operations. These alarms remain active until the proper corrective action is taken. If deficiencies in the performance of the parametric monitoring system occur, corrective action(s) will be taken.

3. Monitoring Location and Averaging Period

The RTO/TCO chamber temperature is based on the average reading of all thermocouples located in the retention chamber – one between each canister. The continuous readings are recorded every 15 minutes and a 3-hour block average is calculated with that information.

4. Recording and Recordkeeping

The RTO/TCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters (temperature). Recordkeeping and reporting of these parameters is managed using a dedicated computer equipped with a relational database (such as Wonderware's Industrial SQL Server Software). The unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.

5. Testing and Implementation Schedule

Stack testing for emission limits is performed as required by the current air operating permit.

6. Quality Assurance/Quality Control

40 CFR 63 Subpart DDDD requires the facility maintain a Quality Control Program for Continuous Monitoring System in accordance with 40 CFR 63.8. G-P has developed and implemented a maintenance schedule which includes monthly, quarterly, semi-annual and annual maintenance activities recommended by the equipment manufacturer and/or determined by Georgia-Pacific to be necessary. The maintenance tasks will assure that the RTO/TCO and data acquisition systems are being maintained as per the manufacturer's recommendations, which have been developed to enhance the reliability of the equipment and minimize the possibility of malfunction of the systems due to a preventable failure.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

	Proposed CAM for EU002	<Existing CAM>
I. Indicator	1.Temperature of RTO/TCO retention chamber	1.Temperature of TCO retention chamber
Measurement Approach	1. Measure the RTO/TCO retention chamber temperature using thermocouples located in the retention chamber. A 3-hour block average of all the thermocouples shall be documented every 15 minutes.	1. Measure the TCO retention chamber temperature using four thermocouples located in the retention chamber. A 12-hour rolling average of all the thermocouples shall be documented every 15 minutes.
II. Indicator Range	1. Any 3-hour block average minimum firebox (retention chamber) temperature reading, below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262(k) is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary.	1. Any 12-hour rolling average reading, for the average of the TCO thermocouples, below 800°F is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary.
III. Performance Criteria		
A. Data Representativeness	Minimum firebox temperature will be determined in accordance with the requirements of 40 CFR 63.2262(k).	The data for determining the operating ranges were developed from onsite stack tests taken in the last compliance test.
B. Verification of Operational Status	1. A parametric monitoring report is reviewed twice each week that summarizes the operating conditions of the RTO/TCO including the temperature. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO/TCO.	1. A parametric monitoring report is printed and reviewed once each week that summarizes the operating conditions of the TCO including the temperature. 2. Visual and audible alarms are triggered when there is a malfunction with the TCO.
C. QA/QC Practices and Criteria (40 CFR 63.2269(b), 63.2282 (e), and Table 2 to 40 CFR 63 Subpart DDDD)	1. Semiannually, the thermocouples are replaced with new units[2] or its accuracy verified with a redundant temperature sensor. 2. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating range or install a new temperature sensor. 3. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. 4. The catalyst is sampled annually to check catalyst activity.	1. Weekly printed report review. 2. Annually, the thermocouples will be calibrated and certified by the company who performs the calibration to verify that the readings are within a +/- 0.75% level of accuracy according to the standard established in ASTM E230. 3. Maintenance schedule of daily, weekly, monthly, quarterly and annual activities. 4. Audible and visual alarms are checked annually during annual maintenance down periods.

[2] Georgia-Pacific interprets that installing a new temperature sensor rather than calibrating the existing unit eliminates the need for redundant temperature monitoring as stated in 63.2269(b)(4). This interpretation is taken from 63.2269(b)(5) which, when the maximum temperature is exceeded, requires calibration or validation or installation of a new sensor.

PROPOSED REVISIONS BY GEORGIA-PACIFIC HOSFORD

	Proposed CAM for EU002	<Existing CAM>
D. Monitoring Frequency (40 CFR 63.2270)	Temperature is measured continuously, recorded at least every 15 minutes, and a 3-hour block average is computed from the 15 minute data.	Temperature is measured continuously (i.e., every 10 seconds), averaged and a 12- hour rolling average recorded every 15 minutes
E. Data Collection Procedures	The RTO/TCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters (temperature). Record keeping and reporting of the parameters are managed using a relational database (such as Wonderware's Industrial SQL Server Software). Additionally, the unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.	The TCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Record keeping and reporting of the parameters are managed using a relational database (such as Wonderware's Industrial SQL Server Software). Additionally,the unit is equipped with a chart recorder that continuously records the temperature and airflow as a back-up in the event of upset or failure of the monitoring computer database.
F. Averaging period (40 CFR 63.2270)	Temperature readings are documented every 15 minutes. The data is then averaged over a block 3-hour period. The 3-hour block average is the value used to verify that there has not been an excursion below the minimum firebox temperature established in accordance with the requirements of 40 CFR 63.2262(k).	Temperature readings are documented every 15 minutes, from data collected every 10 seconds. The data is then averaged over a block 12- hour period. The 12 hour average is the value used to verify that there has not been an excursion below the minimum operational temperature of 800°F.

B. Press RTO/TCO Monitoring Approach Justification (40 CFR 64.4(b))

1. Background

The emissions unit (EU) consists of one 16-opening hot press. The process consists of a forming line, loader, press and unloader, pressure equalization chamber, RTO/TCO, and related duct work. The press operates continuously when the plant is in normal operation, except for routine maintenance and cleaning. The press is equipped with a partial enclosure. Airflow is ducted from the partial enclosure to a pressure equalization chamber and then to the RTO/TCO. VOC compounds, CO, and PM/PM10 are burned in a retention chamber, then the exhaust gases are vented to the atmosphere.

2. Rationale for Selection of Performance Indicators

The RTO/TCO is used to reduce VOC, CO, and PM/PM10 emissions from the hot press. Emissions from the hot press are ducted to the RTO/TCO. To comply with the applicable emission limit, a minimum firebox temperature established in accordance with the requirements of 40 CFR 63.2262(k) must be maintained.

3. Rationale for Selection of Indicator Ranges

The value for the performance indicator was based on stack tests done on the RTO/TCO. Destruction/removal efficiency (DRE) increases with increasing retention chamber temperature, so a maximum temperature limit is not necessary.

C. Control Device Operating Data Recorded During Performance Test (40 CFR 64.4(c))

Summary of the compliance test performed on September 1, 2005.
PM/PM10 = 0.83 lb/hr
VOC = 1.22 lb/hr
CO = 0.12 lb/hr

0770010-011-AC

Control Number: 0800001

Category: NSPS
EPA Office: Region 4
Date: 11/29/2006
Title: Alternative Fuel Usage Recordkeeping Proposal
Recipient: Abrams, Heather
Author: Banister, Beverly H.
Comments:
Subparts: Part 60 Dc Small Indust.-Comm.-Inst. Steam Gen. Units
References: 60.48e(g)

Abstract:

Q: Is a proposal to monitor fuel usage on a monthly basis, rather than a daily basis, acceptable under 40 CFR part 60, subpart Dc, for seven natural gas fired boilers at the Department of the Army's base in Fort Benning, Georgia?

A: Yes. Since there are no applicable emission limits under 40 CFR part 60, subpart Dc for boilers that combust natural gas, EPA determines compliance for these affected facilities can be adequately verified with monthly fuel usage records. NSPS subpart Dc contains emissions limits for sulfur dioxide and particulate, but these limits are only applicable to units that combust coal, oil, and/or wood.

Letter:

11/29/2006

APT-ATMB

Heather Abrams, Chief
Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, GA 30354

Dear Ms. Abrams:

The purpose of this letter is to provide you with a written determination regarding an alternative recordkeeping request outlined in the enclosed letter that the Department of the Army submitted for seven natural gas fired boilers located at Fort Benning, Georgia. These boilers are subject to 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), and the Department of the Army requested approval of a monthly fuel usage recordkeeping frequency as an alternative to a daily recordkeeping frequency. Based upon our review, the proposed alternative recordkeeping frequency is acceptable. Details regarding the Department of the Army's request and the basis for our determination are provided in the remainder of this letter.

The seven affected facilities covered by the Department of the Army's request are located in Buildings 4 (two boilers), 368 (three boilers), and 9180 (two boilers) at Fort Benning. Under provisions in 40 CFR Sec. 60.48c(g), owners and operators of affected facilities under Subpart Dc are required to keep daily records of

the amount of each fuel combusted in each boiler. The seven boilers covered by the Department of the Army's alternative recordkeeping proposal combust only natural gas, and the Department based its request for a reduction in the recordkeeping frequency on a similar proposal that was approved by the U.S. Environmental Protection Agency (EPA) Region 3 in a letter dated June 30, 2005.

On several occasions, Region 4 has approved monthly fuel usage recordkeeping frequencies for Subpart Dc units that combust only natural gas, and the basis for these previous approvals is that there are no applicable emission standards under Subpart Dc for affected facilities that burn only natural gas. Subpart Dc contains emissions limits for sulfur dioxide and particulate, but these limits are only applicable to units that combust coal, oil, and/or wood. Since there are no applicable emission standards for Subpart Dc units that combust only natural gas, compliance for such units can be adequately verified with monthly fuel usage records. Therefore, the reduced recordkeeping frequency that the Department of the Army proposed for the seven Subpart Dc boilers located in Buildings 4, 368, and 9180 at Fort Benning is acceptable to Region 4.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,

Beverly H. Banister
Director
Air, Pesticides and Toxics Management Division

Enclosure

cc: Craig Taylor
Director of Public Works
Department of the Army
Headquarters United States Army Infantry Center
Fort Benning, GA 31905-5000

Polly Gustafson
Environmental Specialist
Directorate of Public Works
Department of the Army
Headquarters United States Army Infantry Center
Fort Benning, GA 31905-5000