



# Georgia-Pacific Wood Products LLC

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

November 6, 2009

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

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BUREAU OF AIR REGULATION

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

0770010-003-AV

Dear Mr. Koerner:

Georgia-Pacific Wood Products LLC (G-P) is requesting an exemption or waiver from the requirement to obtain an air construction permit for a proposed building ventilation system and for the use of an alternate wood species for our Oriented Strand Board (OSB) facility located in Hosford, FL. The facility ID is 0770010 and this letter is in reference to the Title V permit number 0770010-003-AV. These topics were discussed in your offices on June 30, 2009.

## **1. Proposed Building Ventilation System**

Due to the hot indoor temperatures in the mill building, especially during the summer months, G-P would like to install a louvered window system in the top section, near the roof line, of the north and south walls of the facility to help improve and promote cross flow ventilation. The louvered windows would replace existing alternating skylight panels, which do not currently open to allow ventilation. The purpose of the windows would be to allow air to circulate in the mill to reduce heat in the summer and improve working conditions for the plant employees. If the windows do not provide enough heat relief by themselves, we propose to place fans in them. The fans will not be part of any manufacturing or exhaust process.

There are no permit-limited fugitive emissions in the current Title V permit # 0770010-003-AV, nor in the section of the plant where the proposed building ventilation system will be installed. The only unregulated fugitive emissions unit listed in the Title V permit, under Appendix U-1, is the paint booth, which is listed as Emissions Unit EU010 – Fugitive (edge sealing/stenciling booth exhaust w/ dry filter). This Emissions Unit is defined as neither ‘regulated emissions units’ nor ‘insignificant emissions units,’ and is located in a separate section of the plant, where the proposed building ventilation system will not be installed, and will not be affected by this change.

The section of the plant where the ventilation system would be installed begins at the area where the press enclosure is located and continues east towards the end of the building. The existing press enclosure has successfully tested at 95% capture efficiency. In this section of the plant, there is no control of current fugitive emissions except for the building itself, which already has many open bays and doors, and small louvered windows at the base of the north and south walls.

G-P believes that the proposed ventilation system is exempt from permitting requirements per F.A.C. 62-4.040(1)(a) and (b):

*(a) Structural changes which will not change the quality, nature or quantity of air and water contaminant emissions or discharges or which will not cause pollution.*

*(b) Any existing or proposed installation which the Department shall determine does not or will not cause the issuance of air or water contaminants in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified. Such a determination is agency action and is subject to Chapter 120, F.S. Such determination shall be made in writing and filed by the Department as a public record. Such determination may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.*

## **2. Alternate Wood Species**

Hosford OSB would like to reduce operating cost by substituting a portion of the current softwood species with alternate wood species into their process. The alternate wood species that are projected to be used are defined by the American Plywood Association (APA) as “soft hardwoods” and are softwood equivalents for pine plywood and OSB production. The main difference between softwoods and soft hardwoods is moisture and terpene (VOC) content, with soft hardwoods generally containing slightly higher moisture but, greatly reduced terpene content.

G-P reviewed emission factors by NCASI and USEPA and design parameters by the equipment vendors. The emission factors G-P applied in the PSD construction permits (2000 and 2005) reflect a database of source tests that included both softwoods and hardwoods. The softwood dryer and press sources reflect test data with 90 to 100% softwood furnish. The remaining 10% of the furnish for some of the source tests included in the emission factor development consisted of other wood types including hardwoods. Based on the use of soft hardwood species, it was determined that dryer capacity and production would not be impacted by accepting a mix of the alternate wood species.

Based on the above emission factors, the existing conditions of the Title V permit are unaffected by the species substitutions considered here. G-P believes that the use of alternate wood species would fall within F.A.C. 62-4.040(1)(a) and (b). Hosford OSB will ensure that process controls/work practices are in place to assure and document that dryer capacity and production will remain within their Title V permitted limits.

G-P respectfully requests the Department's concurrence with our conclusion that both proposed projects are exempt from the requirement to obtain an air construction permit as described above. 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 404-652-4293 or Eric Chang, Regional Environmental Manager, at 404-652-5203.

Sincerely,



Mark J. Aguilar, P.E.  
Senior Environmental Consultant

Cc: Eric Chang  
Kris Waikins