

Determination of Maximum Achievable Control Technology (MACT)
International Paper Company
McDavid Lumber Mill

The applicant, International Paper Company (formerly known as the subsidiary, Champion International Corp.), applied to the Department for an air construction permit on June 15, 1999 to construct and operate a sawmill. A PSD construction permit was issued on September 10, 1999. International Paper Company subsequently learned of research data that indicated the sawmill dryer would be a major source of methanol, a hazardous air pollutant. Therefore, on December 15, 2000, International Paper Company requested the required determination of Maximum Achievable Control Technology (MACT). The primary sources of hazardous air pollutant (HAP) emissions from the facility are the three lumber drying kilns. HAP emissions from the planing and sawing operations are not readily quantifiable. However, it is estimated that methanol and formaldehyde emissions from these processes will each be less than 1.0 ton per year. The facility will be located at 401 Champion Drive, McDavid, Escambia County, Florida.

The estimated annual tonnage of regulated hazardous air pollutants to be emitted is as follows:

Pollutants	Potential Emissions (tons/year)	MACT Threshold Emission Rate (tons/year)
Formaldehyde	2.8	10
Methanol	31.5	10
Total HAPs	34.3	25

Florida Administrative Code Rule 62-204.800(10)(d)2 requires a MACT review for all major sources of HAPs that are to be constructed or reconstructed, unless:

1. the source is specifically regulated or exempted from regulation under a standard issued pursuant to Section 112(d) "emission Standards," Section 112(h) "Work Practice Standards and Other Requirements," or Section 112(j) "Equivalent Emission Limitation by Permit," and incorporated in another subpart of 40 CFR Part 63; or
2. the owner or operator of the major source received an air construction permit for the construction or reconstruction project before July 1, 1997, or the source was constructed or reconstructed before July 1, 1997.

MACT Determination Requested by the Applicant

International Paper Company performed a data search for other lumber drying kilns in the country to find the best-controlled similar source. A review of EPA's RACT/BACT/LAER clearinghouse revealed no controls on lumber drying kilns. Therefore, the MACT International Paper Company proposed for the lumber kilns, planing and sawing operations, and steam boilers is proper installation, operation, and maintenance.

MACT Determination Procedure

In accordance with 40 CFR 63 Subpart B, which was adopted in Florida Administrative Code Chapter 62-204, *Maximum Achievable Control Technology (MACT) emission limitation for new sources* means the emission limitation which is not less stringent than the emission limitation achieved by the best controlled similar source, and which reflects the maximum degree of reduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed source.

Similar source means a stationary source or process that has comparable emissions and is structurally similar in design and capacity to a constructed or reconstructed source such that the source could be controlled using the same control technology.

In addition, the regulations state that in making the MACT Determination, the Department should give consideration to:

- (a) Any Environmental Protection Agency proposed relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or an adopted presumptive MACT determination for the source category which includes the constructed or reconstructed major source.
- (b) Available information as defined in 40 CFR 63.41.

Though the USEPA has not yet proposed a NESHAP for this source category, MACT for lumber drying kilns is expected to be "no controls".

MACT Determination

After reviewing the applicant's proposed MACT and conferring with the USEPA and their contractor for this NESHAP source category, the Department has made the determination that Maximum Achievable Control Technology (MACT) for the three lumber drying kilns shall be "no controls" but the lumber drying kilns, as well as the planing and sawing operations and boilers, shall be properly installed, operated and maintained. International Paper Company shall compile operation and maintenance plans

for the lumber drying kilns, planing and sawing operations, and boilers that will focus on procedures relevant to minimizing HAP emissions. These operation and maintenance plans must be kept on site and made available to Department personnel for review when requested. As soon as possible after installation of the equipment is complete, submit to the Department a statement that the equipment was properly installed. This statement must be sealed by a professional engineer registered in the state of Florida.

Details of the Determination may be obtained by contacting:

Cindy L. Phillips, P.E.
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Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

Recommended by:

Cindy L. Phillips 8/3/01
Cindy L. Phillips, P.E. Date
Air Toxics/Title III Section
Bureau of Air Regulation

C. H. Fancy 8/3/01
C. H. Fancy, P.E. Date
Chief
Bureau of Air Regulation

Approved by:

Howard L. Rhodes 8/6/01
Howard L. Rhodes, Director Date
Division of Air Resources
Management