Georgia-Pacific

Georgia-Pacific Hosford OSB
PO BOX 322
Hosford, Fl 32334
Telephone 850-379-4017
Fax 404-749-2472

CERTIFIED MAIL

August 31, 2007

Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District
160 Government Center
Pensacola, Florida 32502-5794

RE: Georgia Pacific Wood Products LLC- Hosford, Florida
Permit Number 0770010-003-AV
National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products - 40 CFR Part 63.2251 - Routine Control Device Maintenance Exemption (RCDME)

Dear Rick:

Consistent with the Subpart DDDD provisions allowing a facility to request a routine control device maintenance exemption (RCDME) in recognition of the level of maintenance required by MACT control devices, attached for your review and approval is the RCDME request for the Georgia- Pacific Wood Products LLC, Hosford, Florida OSB Facility.

Thank you for your consideration of our request. If you have any further questions, please contact Paul Hurst at (850) 379-4017.

Sincerely,

Timothy S. Adams
Plant Manager

cc: P. Vasquez

Enclosure

Georgia-Pacific

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PO BOX 322
Hosford, Fl 32334
Telephone 850-379-4017
Fax 404-749-2472

CERTIFIED MAIL 7007 0710 0003 0337 0956

October 14, 2008

Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District
160 Government Center
Pensacola, Florida 32502-5794

RE: Georgia Pacific Wood Products LLC- Hosford, Florida
Permit Number 0770010-003-AV
National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products - 40 CFR Part 63.2251 - Routine Control Device Maintenance Exemption (RCDME)

Dear Mr. Bradburn:

This is in response to your letter dated October 31, 2007, in which you requested additional information related to our request for a Routine Control Device Maintenance Exemption (RCDME) dated August 31, 2007.

- The uptime, downtime and runtime for all equipment and control devices are all tracked and recorded by our Compliance Assurance Monitoring (CAM) plan software. A CAM report is generated and filed to document/report each day's activity (uptime, downtime, runtime) schedule. The period of time for the operation of equipment that occurred when the control device was not in operation will be included in the PCWP MACT Semi Annual Compliance Report along with the percentage of time based on the time of operation for the last twelve months.

- The PCWP MACT Semiannual Compliance Report features a section dedicated to RCDME and in which, the downtimes and associated maintenance activities listed in the request for RCDME, are captured as the event occurs. In specific, the spreadsheet allows for the selection of the appropriate maintenance activity – see "Maintenance Activity" column with dropdown window – and then calculates the annual percent uptime while control device is down and also the percent of

allowable. Please refer to Appendix A which illustrates the RCDME section of the PCWP MACT Semiannual Compliance report.

- Activities that would occur under the RCDME provision will be tracked by the plant Environmental Coordinator and/or the Maintenance Manager within five business days of the event. The tracking report for routine control device maintenance is managed through our work order system software which documents both the processes that are currently operating as well as the control device's operation. Each time a control device is taken off-line for maintenance, a work order is generated that documents the number of hours the device was off-line. Specifically, the work order is filled out by the maintenance personnel that conduct the maintenance activity and then input into the work order data base by the Maintenance Planner. This typically occurs within 24 hours of when the maintenance work was completed. Once the maintenance work order information has been put into the work order data base, it is then accessible on a central network drive to all plant management personnel. This information is used to complete the RCDME section of the PCWP MACT Semiannual Compliance report presented in Appendix A, enclosed herein.

- Emissions are minimized to the greatest extent possible during routine control device maintenance periods in the following ways:

    1. Under normal operations, when a Regenerative Thermal Oxidizer (RTO) control device is going to have any routine maintenance performed on it, product feed to the dryers is stopped. The dryers are allowed to run without product feeding to them for a minimum of fifteen minutes. This allows time for the dryers and associated duct work to the RTO to be purged before the RTO is shut down. Fuel to the dryer burners is turned off and the dryers begin cooling. Dampers isolating dryer emissions from the RTO are closed. To enhance dryer cooling and to prevent the dryer drum from warping, ambient air is circulated through the dryers and vented to atmosphere. Finally, the RTO is shut down and begins cooling so that maintenance activities can be performed.

    2. The same process as described in #1 above is used when an RTO "bakeout" is performed. Under normal operations, product feed to the dryers is stopped, fuel to the dryer burners is stopped and ambient air for dryer drum cooling is circulated through the dryers and vented to atmosphere. Isolation dampers between the dryers and the RTO are closed to isolate the RTO from the dryers during the "bakeout" process. Mechanical interlocks make it physically impossible for air flow from one or more dryers to be routed to an RTO during a "bakeout".

    3. When the Thermal Catalytic Oxidizer (TCO) that controls emissions from the press is going to be shut down for planned maintenance, the press is shut down a minimum of 15 minutes before the TCO is shut down or a

"bakeout" is initiated. This allows the press enclosure and associated duct work going to the TCO to purge before any maintenance activities on the TCO commence. As with the RTOs, once the press is shut down, isolation dampers prevent the flow of air from the press enclosure to the TCO. The TCO also has mechanical interlocks that make it physically impossible for the press to operate while the TCO is shut down.

4. If maintenance is needed on the Control Devices while the processes are still in operation under the RCDME provisions, the processes would be immediately slowed down to a minimal processing speed for maintenance issues that are expected to take less than 15 minutes. If the activity is expected to take more than 15 minutes, the process will be shut down as safely as possible for the personnel and the equipment.

If you have any additional comments or questions please contact Margarete Vest at 904-445-8761.

Sincerely,

Timothy Adams
Operations Manager

Attachment: Appendix A- Semi-Annual Report RCDME Worksheet

Cc: Paul Vasquez
Margarete Vest

Appendix A

Semi-Annual Report RCDME Worksheet

Microsoft Excel - MACT - PCWP - SEMI-ANNUAL COMPLIANCE REPORT - Hosford Version 1(1)(1).5-07-30-08

Reporting				Facility Name:	Georgia Pacific Wood Products	Operating Permit #	770010
Beginning Date:	10/1/2007			Address:	12995 SR 65 North, Hosford,	Date Agency Approved	Not yet approved
Ending Date:	6/30/2008			Date of Report:	7/17/2008		

(To record periods of maintenance addressed in the RCDME and resulted in excess emissions)
Requirements under Table 9 to Subpart DDDD of Part 63.2281(c)(5)(iii)(A)-(C).

Press (OSB, HB) or Veneer		Current Compliance Period		Previous Compliance Period				
Date	Maintenance Activity	Total Run Time (minutes)	Total Time of Maintenance with Bypass	Total Run Time (minutes)	Total Time of Maintenance with Bypass (minutes)	Annual Percent of Uptime while RTO/RCO is Down	Percent Down Time Allowance Approved by Agency (Max. 0.5%)	Percent of Allowable
Pending agency approval				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
				Continue			0.5%	
		0	0			#DIV/0!	0.5%	#DIV/0!

Preventive & Internal Inspection
Bakeout
Washout
Media Replacement
Catalytic Media Sampling
Replacement of Operator/Party

Press/Dryer MDF, HB) or OSB Dryers		Current Compliance Period		Previous Compliance Period				
Date	Maintenance Activity	Total Run Time (minutes)	Total Time of Maintenance with	Total Run Time (minutes)	Total Time of Maintenance with Bypass	Annual Percent of Uptime while RTO/RCO is	Percent Down Time Allowance Approved by Agency (Max.	Percent of Allowable
Pending agency approval				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
				Continue			3%	
		0	0			#DIV/0!	3%	#DIV/0!

Descriptions-Work Practices / RCDME / Performance Test Results