40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Panels (PCWP) MACT

Hosford, FL OSB Facility – January 2010

Citation	Applicability
§63.2230	The PCWP MACT establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. This regulation also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements.
§63.2231	**Applicable -** The Hosford, FL OSB facility manufactures a composite wood product known as Oriented Strand Board (OSB). The facility is a major source of Hazardous Air Pollutants (HAPs). The Table below shows that the total potential HAP emissions from the facility's significant emission sources are greater than 25 tons/year threshold that defines a major source and therefore the facility is subject to PCWP MACT Standards. **Source Description** — **Total HAPs (THC as C)* – Ton/Yr** 600 MMSF/Yr – 3/8" Basis Production Capacity — **Uncontrolled** 505.15 — **Controlled** 52.65 Dryers, Press, and Thermal Oil Heater * HAPs are measured as THC (as carbon). Hazardous Air Pollutants include Acrolein, Acetaldehyde, Formaldehyde, Methanol, Phenol and Propionaldehyde. Total controlled HAPs (measured as THC as carbon) are based on the current permit limit for VOC (as C) and the uncontrolled total HAP value assumes a 90% control efficiency. **Not Applicable - §40 CFR 63.2231** A portion of this section refers to the low-risk subcategory of PCWP manufacturing facilities as specified in appendix B to the rule. This provision of the rule has been vacated by the court and no longer available as a compliance option. **Applicable - §63.2231(a)** The facility is a PCWP facility that manufactures composite wood products by bonding wood material (strands), generally with resin under heat and pressure, to form a structural panel or engineered wood product known as OSB. **Applicable - §63.2231(b)** The facility is a major source for HAP. The Table above indicates that total HAPs emissions from the facility are over the 25 tons/year threshold. Refer to the process description page in the Title V permit application for a description of the OSB manufacturing facility.
§63.2232	**Applicable - §63.2232(a), (b) and (e)** The facility is an existing affected source since it commenced construction prior to January 9, 2003 (date in the regulation that defines a new source). Paragraph (b) lists all affected sources. Many of the sources listed in the permit are considered affected sources under the regulation. However, only the rotary flake dryers, the reconstituted wood product press, and Group 1 miscellaneous coating operations are subject to emission limits and/or work practice standards. **Not Applicable – §63.2232(c), (d)** The facility is not new or reconstructed. Construction of the Facility commenced upon issuance of the PSD Construction permit on October 11, 2000. This is before the trigger date of January 9, 2003.

Citation	Applicability
§63.2233	**Not Applicable - §63.2233(a), (c)** The Facility is not new or reconstructed. Construction of the Facility commenced upon issuance of the PSD Construction permit on October 11, 2000. This is before the trigger date of 1/9/03 **Applicable - §63.2233 (b) and (d)** The Facility installed two RTOs and one TCO to control THC emissions from the 5 rotary flake dryers and hot press, respectively, prior to the October 1, 2007 deadline. The facility also implemented the Group 1 Miscellaneous Coating Operations Work Practice by the deadline. Notifications of Compliance Status were submitted in a timely manner and compliance has been demonstrated with the applicable compliance options, operating requirements, and work practice requirements.
§63.2240	**Applicable - §63.2240 (b)** The Facility is using the add-on control device compliance option (two RTOs and one TCO to control THC emissions from the 5 rotary flake dryers and hot press, respectively). The Facility is using Option (1) of Table 1B, "reduce emissions of total HAP, measured as THC (as carbon) by 90%" for both, 5-flake dryers and press. Facility also uses a wood products enclosure that achieves capture efficiency greater than or equal to 95 percent. In accordance with Table 2, the Facility maintains the 3-hour average firebox temperature greater than the minimum temperature established during the most recent performance test. However, we retain the ability to use any of the six (6) available compliance options in Table 1B allowed under the PCWP MACT and contained in the permit for future compliance demonstrations. **Not Applicable - §63.2240(a), (c)** The facility does not use the Production-Based or Emissions Averaging Compliance Options; therefore, not applicable. However, we retain the ability to use these other compliance options allowed under the PCWP MACT and contained in the permit for future compliance demonstrations.
§63.2241	**Applicable - §63.2241 (a), (b)** The facility complies with Table 3 Item (5) by ensuring only non-HAP coatings are used for all Group 1 miscellaneous coating operations. No action required for section (b) which is reserved for EPA or the delegated agency to grant permission to use alternatives to the work practice requirements. **Not Applicable - §63.2241 (c)** The facility operates five (5) rotary dryers; however, none of its rotary dryers were designated as dry rotary dryers. Therefore, this section does not apply.

Citation	Applicability
§63.2250	**Applicable - §63.2250 (a) through (c)** The Facility has developed and implemented a Startup, Shutdown and Malfunction (SSM) Plan as required by the rule. The Facility always operates and maintains the flake dryers and RTOs; press and TCO and monitoring equipment, in accordance with the Facility's preventive and maintenance program **Not Applicable - §63.2250 (d)** The facility does not operate any direct-fired softwood veneer dryers. Therefore, this section is not applicable.
§63.2251	**Applicable - §63.2251 (a) through (e) – except (b)(3)** The Facility has requested the routine control device maintenance exemption for the two RTOs controlling emissions from the five rotary flake dryers and for the TCO controlling press emissions. The Florida DEP is currently reviewing the RCDME request submitted to FL DEP on 8/31/07. The Facility also submitted a response to a Request for Additional Information (RAI) from FDEP on RCDME on 10/14/08. As required by the RCDME plan, the Facility will record the time that RTO or TCO maintenance exemption is performed **Not Applicable - §63.2251 (b)(3)** Emissions from the rotary dryers and press are not controlled in a single control device. Therefore, this section is not applicable.
§63.2252	**Applicable - §63.2252** The facility has several process units that are subject to the PCWP MACT standard and have no control or work practice requirements. These process units include: • green end operations, • resin preparation, • blending and forming operations, • drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), and • miscellaneous finishing operations (such as sanding, sawing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)).

Citation	Applicability
§63.2260	**Applicable - §63.2260 (a) through (c)** The Facility established the minimum firebox temperature requirement as specified in Table 2 of the rule. The initial performance test of the RTO controlling emissions from the 5 flake dryers and the TCO controlling emissions from the wood products press was conducted during 2/19-21/08. The capture efficiency for the wood product press was repeated on 4/9/08. The performance tests were conducted in accordance with the methods outlined in Table 4 and Table 5. The Facility submitted the Notification of Compliance Status (NOCS) Report to the Florida DEP on 4/21/08 as required and included the initial compliance demonstrations for the Group 1 Miscellaneous Coating Operations per Item (5) in Table 6 of the rule. **Not Applicable - §63.2260 (a) [partial]** The Facility does not operate a combustion unit that accepts process exhausts into the flame zone, therefore, the exemption from the initial performance testing and operating requirements for thermal oxidizers is not applicable.
§63.2261	**Applicable - §63.2261 (a) and (b)** The Facility completed the initial compliance demonstrations within the time frames specified for both, performance tests and demonstrations that do not require performance tests. In specific, performance test of the RTO controlling emissions from the 5 flake dryers and the TCO controlling emissions from the wood products press was conducted during 2/19-21/08. The capture efficiency for the wood product press was repeated on 4/9/08. Initial compliance demonstration for the Group 1 Miscellaneous Coating Operations was completed on 10/31/07. This information is included in the Notification of Compliance Status (NOCS) Report to the Florida DEP dated 4/21/08
§63.2262	**Applicable - §63.2262 (a) through (l) except (d)(2), (f), (g)(2), (i), (j), and (k)(3), and (m) through (o)** The Facility's Notification of Performance Test (NOPT) was filed on 12/21/07. The performance tests were conducted in accordance with the applicable provisions and requirements. Protocol for the performance test submitted with the NOPT describes the required test methods, operating conditions, data collection, percent reduction calculation, determined the firebox minimum temperature, etc. The facility will file notification with the Florida DEP if there is a need to change the minimum firebox temperature in the RTOs or TCO. **Not Applicable - §63.2262(d)(2), (f), (g)(2), (i), (j), and (k)(3), and (m) through (o)** The Facility is not using the production-based compliance option; a biofilter; or introducing process exhaust gases into a flame zone in a combustion unit to meet PCWP MACT and therefore the sections listed above do not apply
§63.2263	**Not Applicable - §63.2263** Facility operates 5 rotary dryers; however, the dryers are not designated as dry rotary dryers and therefore not subject to the requirements of this section.
§63.2264	**Not Applicable - §63.2264** The facility does not operate a hardwood veneer dryer, and therefore not subject to the requirements in this section.

Citation	Applicability
§63.2265	**Not Applicable - §63.2265** The facility does not operate a softwood veneer dryer, and therefore not subject to the requirements in this section.
§63.2266	**Not Applicable - §63.2266** The facility does not operate a veneer redryer, and therefore not subject to the requirements in this section.
§63.2267	**Applicable - §63.2267** The Facility operates a wood products press and enclosure. The facility used the alternative tracer gas test method contained in appendix A to the PCWP MACT rule, to determine the capture efficiency. The facility's Notification of Compliance Status (NOCS) was submitted on 4/21/08.
§63.2268	**Not Applicable - §63.2268** The facility does not operate a wet control device to meet the PCWP MACT standards.
§63.2269	**Applicable - §63.2269(a) and (b)** Continuous parameter monitoring systems (CPMS) for the monitoring of temperature and abort damper position are installed in the dryers RTOs and press TCO and conveyance systems, respectively. The CPMS are inspected and accuracy or function verified as required in the regulation. In specific, the Quality Control Program for the Continuous Monitoring System provides the mechanism to maintain, inspect, verify specifications and set conditions for CMS. The control logic in Wonderware can also be used to verify the 15 minutes cycle required by the rule. Performance specifications and instructions manuals for the thermocouples and position contacts provided by the suppliers are available at the facility. Sections 3 and 3.2 of the Quality Control Program for the Continuous Monitoring System address the maintenance, and inspections and procedures for CMS. In addition, our maintenance planning system is used to schedule and record results of inspections and validation checks of the CMS. Additional tasks are set the Facility's Environmental Calendar for the Facility Environmental Coordinator (FEC) to verify that PCWP MACT related maintenance and inspection tasks are completed on a timely manner. **Applicable - §63.2269(c) and (d)** The facility does not have any dry rotary dryers or veneer redryers and therefore is not required to monitor moisture in wood. The facility does not have any Continuous Emissions Monitoring Systems (CEMs).

Citation	Applicability
§63.2270	**Applicable - §63.2270 (a) through (d) and (f)** Continuous parameter monitoring systems (CPMS) for the monitoring of firebox minimum temperature in RTOs and TCO (3-hour block temperature) and abort damper contacts (damper position) are operated continuously at all times that the process units (flake dryers and press) are operating. A CMS report is printed daily and reviewed by FEC to determine trends and identify data collected during periods of SSM events, CMS malfunctions, repairs, QA check, etc., and verify that valid data is at least 75% of the recorded readings. **Not Applicable - §63.2270 (e)** The facility does not operate a dry rotary dryer or veneer redryer and therefore is not required to monitor moisture in wood. The facility does not operate a biofilter and therefore, the monitoring of bed temperature and outlet THC do not apply.
§63.2271	**Applicable - §63.2271 (a) and (b)** The Facility uses Items (1) and (2) in Table 2 for the dryers' RTOs and press TCO, respectively, and Item (1) in Table 7 for both control systems to demonstrate continuous compliance with the operating requirements. Item (4) in Table 7 is used for the press TCO relative to checking the activity level of a representative sample of the catalyst at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range. The Facility uses Item (5) of Table 8 to demonstrate continuous compliance with the work practice requirements for Group 1 Miscellaneous Coating Operations. The Facility will follow and document compliance with its SSM Plan.

Citation	Applicability
§63.2280	**Applicable - §63.2280 (a) through (e), (g)(1) and (g)(3)** The Facility filed its Initial Notification Report (INR) within 120 days after 9/28/04 as required by the rule. The INR is dated 1/13/05. This requirement is complete and no further action is required. The Facility filed a written notification of intent to conduct the performance test within 60 calendar days before the scheduled date as required by the rule. The Notification of Performance Test (NOPT) is dated 12/21/07. The Initial performance test was conducted on 2/19-21/08. The capture efficiency for the wood product press was repeated on 4/9/08. Facility filed a Notification of Compliance Status (NOCS) for the performance test dated 4/21/08. Both test reports were included in the NOCS. Facility's Notification of Compliance Status (NOCS) for Group 1 Miscellaneous Coating Operations Work Practice was submitted on 10/31/07. A Request for Control Device Maintenance Exemption (RCDME) was submitted to the Florida DEP on 8/31/07. The Facility also submitted a response to a Request for Additional Information (RAI) from FDEP on RCDME on 10/14/08. Currently, waiting for agency approval. The Facility is expected to notify the FL DEP and EPA within 30 days before modifying or replacing the control system for the press or dryers, or before changing the firebox minimum temperature set for the dryers RTO or press TCO. If the Facility chooses to conduct a new PCWP MACT compliance test, then the Facility will submit a new notification of intent to conduct the performance test within 60 calendar days before the scheduled date as required by the rule. **Not Applicable - §63.2280 (f) and (g)(2)** The Hosford OSB facility does not use the emissions averaging compliance option and therefore is not required to meet sections (f) and (g)(3).

Citation	Applicability
§63.2281	**Applicable - §63.2281 (a) through (e), and (g)** The first compliance report covered the period beginning on the compliance date of 10/1/07 and ending on 6/30/08, which lasted at least 6 months, but less than 12 months as required by the rule. The Hosford OSB facility filed Semiannual Compliance Reports on 7/31/08 and 1/29/09. Submittal of first and subsequent compliance reports were in accordance with the rule – e.g., delivered no later than 7/31/08 for first report and 1/31/09 for second report Subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31, and postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively. The facility will notify the Florida DEP about filing the required semiannual compliance report according to the dates set for the Title V permit semiannual deviation report and annual compliance certification once the PCWP MACT compliance requirements have been incorporated into the Title V permit. **Not Applicable - §63.2281 (f)** The facility does not use the emissions averaging compliance option and therefore not required to report emissions averaging related calculations.

Citation	Applicability
§63.2282	**Applicable - §63.2282 (a) through (c) and (e)** The facility's records required to document compliance with PCWP MACT are maintained on-site. Documents include notifications and reports that were submitted to Florida DEP and EPA to comply with PCWP MACT. These records include: • Initial Notification Report. • Notification of Compliance Status (NOCS) • Notification of Performance Test (NOPT), test reports and performance evaluations • Startup, shutdown, and malfunction related documents. • Performance tests and performance evaluations reports • 3-hour block averages of RTO/TCO firebox minimum temperature • Determination of RTO/TCO firebox minimum temperature • Records showing use of non-HAP coatings - Group 1 Miscellaneous Coating Operations • Performance evaluation plan as required in §63.8(d)(3). • Records of the date and time that each deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. • Agency approval of RCDME (pending) • TCO annual catalyst activity test **Not Applicable - §63.2282 (d)** The Facility does not use CEMS or emissions averaging compliance option to comply with PCWP MACT and therefore not subject to the recordkeeping requirements for CEMS and emissions averaging compliance option.
§63.2283	**Applicable - §63.2283** The facility will keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records will be kept on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according. The remaining records may be kept offsite for the remaining 3 years.
§63.2290	**Applicable - §63.2290** Table 10. This section is applicable.
§63.2291	**Applicable - §63.2291** This section is applicable; however, it is intended that the Florida DEP implement and enforce this subpart.
§63.2292	Pertinent definitions are applicable.

Summary of Applicable Requirements of the PCWP MACT
Hosford, FL OSB Facility – January 2010

Citation	Applicability
Table 1A	**Not Applicable -** The facility does not use any of the Production-Based compliance options in Table 1A.
Table 1B	**Applicable -** The Facility uses Option (1) of Table 1B to meet PCWP MACT. (1) Reduce emissions of total HAP, measured as THC (as carbon)[a], by 90 percent However, we retain the ability to use any of the six (6) available compliance options in Table 1B allowed under the PCWP MACT and contained in current permit for future compliance demonstrations.
Table 2	**Applicable -** The Facility established a three hour block average minimum firebox temperature for both, the two regenerative thermal oxidizer (RTO) controlling emissions from the 5 flake dryers and the TCO controlling emissions from the press. The 3-hour block average firebox temperatures (Items (1) and (2) in Table 2) are maintained above the minimum temperature established during the performance test conducted on 2/19/08 and 4/9/09. For the press TCO, the activity level of a representative sample of the catalyst is checked at least every 12 months **Not Applicable** – Items (3), (4) and (5) in Table 2 and listed below do not apply to the Facility: (3) Biofilter (4) Control device other than a thermal oxidizer, catalytic oxidizer, or biofilter (5) Process unit that meets a compliance option in Table 1A of this subpart, or a process unit that generates debits in an emissions average without the use of a control device
Table 3	**Applicable -** The facility complies with the work practice requirement, Item (5) in Table 3 for the group 1 miscellaneous coating operations. **Not Applicable** – Items (1), (2), (3) and (4) in Table 3 and listed below do not apply to the facility: (1) Dry rotary dryers (2) Hardwood veneer dryers (3) Softwood veneer dryers (4) Veneer redryers

<table>
<tr><th>Citation</th><th>Applicability</th></tr>
<tr><td>Table 4</td><td>The requirements in Table 4 that are applicable and not applicable during performance testing of the dryers RTOs and press TCO are summarized below:
<table>
<tr><th>Applicable Requirements</th><th>Dryers RTOs</th><th>Press TCO</th></tr>
<tr><td>select sampling port's location and the number of traverse ports</td><td>Yes</td><td>Yes</td></tr>
<tr><td>determine velocity and volumetric flow rate</td><td>Yes</td><td>Yes</td></tr>
<tr><td>conduct gas molecular weight analysis</td><td>Yes</td><td>Yes</td></tr>
<tr><td>measure moisture content of the stack gas</td><td>Yes</td><td>Yes</td></tr>
<tr><td>measure emissions of total HAP as THC</td><td>Yes</td><td>Yes</td></tr>
<tr><td>measure emissions of total HAP (as defined in §63.2292)</td><td>No</td><td>No</td></tr>
<tr><td>measure emissions of methanol</td><td>No</td><td>No</td></tr>
<tr><td>measure emissions of formaldehyde</td><td>No</td><td>No</td></tr>
<tr><td>meet the design specifications included in the definition of wood products enclosure in §63.2292; or</td><td>No</td><td>No</td></tr>
<tr><td>determine the percent capture efficiency of the enclosure directing emissions to an add-on control device</td><td>No</td><td>Yes</td></tr>
<tr><td>determine the percent capture efficiency</td><td>No</td><td>No</td></tr>
<tr><td>establish the site-specific operating requirements (including the parameter limits or THC concentration limits) in table 2 to this subpart</td><td>Yes</td><td>Yes</td></tr>
</table></td></tr>
<tr><td>Table 5</td><td>Applicable – The Facility used option (2) in Table 5 to demonstrate initial compliance with the reduction of total HAP emissions, measured as THC, by 90% from the two RTOs controlling emissions from the 5 flake dryers and from the TCO controlling emissions from the press.

Not Applicable - The Facility did not choose any of the other options or does not contain any of the process units in Table 5 listed below. Therefore, they are not applicable:
<table>
<tr><td>(1) Meet the production-based compliance options listed in Table 1A to this subpart</td></tr>
<tr><td>(3) Limit emissions of total HAP, measured as THC, to 20 ppmvd</td></tr>
<tr><td>(4) Reduce methanol or formaldehyde emissions by 90 percent</td></tr>
<tr><td>(5) Limit methanol or formaldehyde emissions to less than or equal to 1 ppmvd (if uncontrolled emissions are greater than or equal to 10 ppmvd)</td></tr>
<tr><td>(6) Compliance options in Tables 1A and 1B to this subpart or the emissions averaging compliance option in §63.2240(c)</td></tr>
<tr><td>(7) Compliance options in Table 1B of the rule or the emissions averaging compliance option in §63.2240(c)</td></tr>
<tr><td>(8) Compliance options in Table 1B of the rule or the emissions averaging compliance option in §63.2240(c)</td></tr>
</table></td></tr>
</table>

Citation	Applicability
Table 6	**Applicable** – The facility has demonstrated initial compliance with Item (5) in Table 6 for the Group 1 miscellaneous coating operations work practice. **Not Applicable** - The work practice requirements in Table 6 listed below do not apply to the facility: (1) Dry rotary dryer (2) Hardwood veneer dryer (3) Softwood veneer dryer (4) Veneer redryers
Table 7	**Applicable** – The Facility is demonstrating continuous compliance with Item (1) in Table 7 by continuously collecting and recording the 3-hour block average firebox temperatures (Items (1) and (2) in Table 2) and which are maintained above the minimum temperature established during the performance tests conducted on 2/19-21/08 and 4/9/08. Item (4) in Table 7 applies to the press TCO and the activity level of a representative sample of the catalyst is checked at least every 12 months. **Not Applicable** – The facility does not use a biofilter, a wet control device, or emissions averaging compliance options, and therefore, Items (2), (3), (5) and (6) in Table 7 of the rule, do not apply.
Table 8	**Applicable** – The facility is demonstrating continuous compliance with Item (5) in Table 8 for the Group 1 miscellaneous coating operations work practice by using and maintaining records of the use of non-HAP coatings. **Not Applicable** – Items (1), (2), (3) and (4) in Table 8 and listed below do not apply to the facility: (1) Dry rotary dryers (2) Hardwood veneer dryers (3) Softwood veneer dryers (4) Veneer redryers

Citation	Applicability

Table 9	**Applicable** – The Facility is expected to file semiannual compliance reports.
	
	Regarding immediate notification to the Florida DEP of startup, shutdown, and malfunction events that are not consistent with the SSM Plan, the Facility is prepared to make these notifications as follows:
	
	• Within 2 working days after starting actions inconsistent with the plan:
	  o Call Division of Air Resource Management (850) 488-0114
	  o Send fax to Division of Air Resource Management (850) 922-6979
	
	• Within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority, send follow up letter to:
	  o Division of Air Resource Management
	  2600 Blair Stone Road
	  MS 5000
	  Tallahassee, Fl 32339-2400

Table 10	Table 10 specifies the applicability of the General Provisions to Subpart DDDD sources.