

Appendix B

Work Practice Compliance Plan

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Georgia-Pacific

PLYWOOD & COMPOSITE WOOD PRODUCTS (PCWP) MACT

40 CFR 63, SUBPART DDDD

**SOFTWOOD VENEER DRYERS
WORK PRACTICE COMPLIANCE PLAN**

FOR THE

Georgia-Pacific Wood Products LLC

Hawthorne Plywood Plant

Hawthorne, Putnam County, Florida

Plywood & Composite Wood Products (PCWP) MACT
40 CFR Part 63, Subpart DDDD
Softwood Veneer Dryer Work Practice Compliance Plan

I. Introduction

The PCWP MACT at §63.2241 requires compliance with the applicable work practices as contained in Table 3 of the rule. Table 3 requires that *Softwood Veneer Dryers* minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end (infeed) of the dryers (through proper balancing of the heated zone exhausts). The relevant terms are defined as follows in §63.2292:

II. Definitions

Softwood veneer dryer means a dryer that removes excess moisture from veneer by conveying the veneer through a heated medium, generally on rollers, belts, cables, or wire mesh. Softwood veneer dryers are used to dry veneer with greater than or equal to 30 percent softwood species on an annual volume basis. Veneer kilns that operate as batch units, veneer dryers heated by radio frequency or microwaves that are used to redry veneer, and veneer redryers (defined elsewhere in this section) that are heated by conventional means are not considered to be softwood veneer dryers. A *softwood veneer dryer* is a process unit.

Softwood means the wood of a coniferous tree. Examples of softwoods include, but are not limited to, Southern yellow pine, Douglas fir, and White spruce.

Veneer means thin sheets of wood peeled or sliced from logs for use in the manufacture of wood products such as plywood, laminated veneer lumber, or other products.

Georgia-Pacific's Hawthorne Plywood Plant operation includes 3 *Softwood Veneer Dryers*.

III. Initial Compliance Demonstration

PCWP MACT Table 7 requires that initial compliance be demonstrated by:

1. Minimizing fugitive emissions from the dryer doors and the green end (infeed)
2. Submitting for review and approval, a copy of your plan for minimizing fugitive emissions from the veneer dryer doors and infeed as required in §63.2265 with the Notification of Compliance Status

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IV. Continuous Compliance Demonstration

PCWP MACT Table 8 requires that continuous compliance be demonstrated by:

1. Following your plan for minimizing fugitive emissions from the veneer dryer doors and infeed
2. Keeping records to document that you are following your plan for minimizing fugitive emission from the veneer dryer doors and infeed

V. Notifications, Reports, and Records

PCWP MACT requires:

1. A copy of your plan for minimizing fugitive emissions from the veneer dryer doors and green end that was submitted for review and approval with the Notification of Compliance
2. A Semi-Annual Compliance Report detailing, in accordance with §63.2281(d), each deviation to the work practice requirement to minimize fugitive emissions from the softwood veneer dryer doors and infeed. If there are no deviations from the softwood veneer dryer work practice requirements, the Semi-Annual Compliance Report shall contain a statement, in accordance with §63.2281(c)(7), that there were no deviations from the work practice requirements during the reporting period
3. Records, in accordance with §63.2282(b), (maintenance, repair, inspection records/procedures, etc) that establish compliance with the softwood veneer dryer work practice requirement
4. Records be kept at least 5 years with records on site for at least 2 years (may be kept off site for remaining 3 years) in accordance with §63.2283(b), (c)

VI. Compliance Details

Georgia-Pacific's Hawthorne Plywood Plant facility will maintain compliance with the work practice requirements for Softwood Veneer Dryers by developing and following an inspection and maintenance plan for minimizing fugitive emissions from the veneer dryer doors and infeed.

Weekly inspections of dryer doors will be used to schedule repairs on dryer down day. Prior to the weekly scheduled shut down of one dryer, the Dryer Leader will observe that dryer and note any doors with excessive emissions. The Dryer Leader, or his designee, will enter a work order into MP2 for completing the work during the dryer's maintenance down time.

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Maintenance records are kept in MP2.

Required Documentation:

- Current records of inspections and maintenance for the softwood veneer dryer doors and dryer infeed will be maintained MP2 and will be reviewed by the Environmental Coordinator at least every six months as part of the preparation of the Semi-Annual Compliance Report.
- Any plans for a changes to the plan will be reviewed by the Environmental Coordinator for compliance with the work practice requirements and will be submitted to the Field Engineer prior to implementation.

VII. Plant-Specific Activities, Hawthorne Plywood

Dryer Doors

The Dryer Department Leader observes overall dryer operational condition as part of his general duties. When excess door leakage is noted, he or someone at his direction initiates a production work order in the plant's MP2 maintenance scheduling/documentation system for adjustment of the leaking door. Door adjustments can be made while the dryer is in normal operation. Completed work orders for adjustments are maintained in MP2. Information for these adjustments can be found in MP2 Work Order History via a search for *Door Adjustment*.

Detailed inspection, repair and/or replacement of defective door seals and grout seals at the base of the dryer must be done during a cold maintenance shutdown of the dryer. Normally, one of the three (3) veneer dryers at the Hawthorne facility is shut down each week on a rotating basis for a period of approximately 8 hours for routine preventive maintenance and cleaning. The other two (2) veneer dryers remain operational during this period. Detailed visual observations of door seals and grout seals are made during the dryer's maintenance down day, and specific repair needs are identified.

Based on the inspection, work orders are initiated in MP2 for the needed repairs. Defective door seals and grout seals are repaired or replaced during the maintenance shutdown. Work orders for completed repairs are recorded in MP2. This information can be found in MP2 Work Order History via a search for *Dryer Door Seals and Grout Seals*.

Dryer Infeed

Emissions from the infeed (green end) of the dryer are minimized by adjusting the dryer exhaust dampers. The Dryer Department Leader observes and documents overall dryer operating condition as part of his general duties. When excess infeed emissions are noted, he or someone at his direction initiates a work order in MP2 for adjustment of the dryer exhaust dampers. Damper adjustments can be made during normal dryer operation. Based

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on the inspection, work orders are initiated in MP2 for any adjustments needed. Work Orders for completed adjustments are recorded in MP2. Information for these adjustments can be found in MP2 Work Order History via a search for *Dryer Damper Adjustment*.

Routine adjustments of the dryer exhaust dampers for change of wood species are not recorded in MP2. Currently, prior to running sand pine veneer in a dryer, the dampers on that dryer are adjusted to a different setting. This practice is due to the fact that sand pine typically has less moisture than other species, and a slight reduction of the dryer exhaust damper openings is necessary to reduce the risk of fire inside the dryer. These settings are maintained throughout the course of sand pine, which usually lasts no more than one shift. After all the green sand pine veneer is dried, the dampers are reset to their normal positions for the drying of all other species of wood veneer. Runs of sand pine are rare, usually occurring less than once per month. Hawthorne's experience suggests that fugitive dryer emissions are not greater during runs of sand pine.