Florida Department of Environmental Protection

Northeast District
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Charlie Crist
Governor

Jeff Kottkamp
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Michael W. Sole
Secretary

March 2, 2010

Ms. Teresa Davidson
Georgia-Pacific Wood Products, LLC.
223 Gordon Chapel Road
Hawthorne, Florida 32640

Re: Title V Air Operation Permit Revision/Renewal
PROPOSED Permit No.: 1070015-022-AV
Hawthorne Plywood Mill

Dear Ms. Davidson:

One copy of the "PROPOSED Determination" for the Proposed Title V Air Operation Permit Revision for the Georgia-Pacific Wood Products, LLC.' Hawthorne Plywood Mill located at 223 Gordon Chapel Road, Hawthorne, Putnam County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/eproducts/ards/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact MengChiu Lim at 904/807-3238.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:mcl

Enclosures

Cc: Mark J. Aguilar, P.E., Georgia Pacific, LLC. [Email: mjaguila@gapac.com]
Steve M. Wilson, Regional Environmental Manager, Georgia-Pacific Wood Products, LLC. (SMWilson@GAPAC.com)
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)

PROPOSED Determination

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Georgia Pacific Wood Products, LLC. for the facility located at 223 Gordon Chapel Road, Hawthorne, Putnam County was issued on January 19, 2010. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the *Palatka Daily News* on January 30, 2010. The DRAFT Title V Air Operation Permit was available for public inspection at the Northeast District Office in Jacksonville. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on February 8, 2010.

II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from 1 respondent during the 30 (thirty) day public comment period. Listed below is each response to each comment received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Comments from the applicant received on February 15, 2010.

i. The applicant proposes to make changes to specific condition No. A.2 of Section III. The applicant proposes to describe "plywood trim" as "resinated plywood trim". The applicant also proposes to add language in the condition to allow the Electrostatic Precipitator to operate with only one cell if performance testing demonstrates that the unit can meet the emissions limit under such operation mode.

Response: The Department agrees to make the descriptive changes of "resinated plywood trim". The Department disagrees with the proposal regarding the method of operation for the Electrostatic Precipitator. The Department finds that this proposal is a significant change, and shall be addressed in a separate application to allow for more thorough review of the proposal.

ii. The applicant proposes to make changes to specific condition No.A.12 of Section III. The proposed changes are as shown below.

(1) The gallons of used oil burned each month, excluding on-specification used oil contained in ~~the~~ any-spill cleanup materials.
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period excluding any on-specification used oil contained in spill cleanup materials.
(3) Results of the analyses required.
(4) The permittee shall maintain on-site records of all used oil sampling documentation and laboratory analysis information for a period of ~~up to~~ 5 years."

Response: The Department agrees with the proposed descriptive changes. The recordkeeping of the on-specification used oil usage is not intended to account for used oil contained in the spill cleanup materials as it is believed that the quantity will be relatively small, and there is no practical way to measure or estimate the quantity.

iii. The applicant proposes to make changes to the CAM plan language.

a. The applicant proposes to change the measurement approach language to

"Measure the RTO chamber temperature using ~~three~~ the thermocouples located in the combustion chamber."

It's explained that the proposed change is due to the concern about the potential liability of violation with condition language if more than three thermocouples are installed.

Response: The Department agrees to change the language to "at least three thermocouples…." To address facility's concern, but prefer to have a specified number of thermocouples in the CAM plan as it add reassurance that the RTO has sufficient number of thermocouples and the measured temperature is representative of the temperature in the combustion chamber.

b. The applicant proposes to change the definition of excursion to

"Any 3-hour block average firebox temperature at or below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262 (k)."

Response: The Department agrees with the proposed change. The language offers more details about the requirements, and does not change the original intent of the condition.

c. The applicant proposes to change the language in data representativeness to

"Minimum firebox temperature will be determined in accordance with the requirements of 40 CFR 63, Subpart DDDD"

Response: The Department agrees with the idea of making the condition more inclusive, but has decided to revise the condition to "The data for determining the operating range will be developed base on the performance test (s) and the procedures described in 40 CFR 63.2260 through 22269, at which the RTO could operate at and maintain compliance." as it will address the issue being brought up, and still offer sufficient details about the requirements.

d. The applicant proposes to replace "temperature gauges" with "monitoring equipments" to verify the operational status of the RTO. The applicant also requests to delete the wording of "printed" associates with monitoring report as the facility has more

ways to review the report (i.e. computer) instead of previous past practices of reviewing the printed report.

Response: The Department agrees with the applicant. The word "printed" will be deleted from the entire portion the CAM plan that associates with the monitoring report.

e. The applicant proposes to conduct temperature sensor validation checks semiannually instead of performing calibration on the temperature sensor annually.

Response: Plywood MACT requires the facility to calibrate the temperature sensor semiannually, more frequent than the CAM QA/QC requirements. It is unclear whether the "validation check" proposed by the applicant can be treated as "calibration". The Department will not make the changes as requested. It is believed that as long as facility complying with the Plywood MACT monitoring equipment's calibration requirements, they should be able to satisfy the calibration requirement in the CAM plan. A permitting note is inserted in the CAM plan to reflect how the facility complies with Plywood MACT requirements regarding this issue.

f. The applicant proposes to change the language in the data collection procedures. The proposed language is as shown below.

"Additionally, the unit is equipped with a chart recorder that continuously records the firebox temperature as a back-up ~~in the event of upset or failure~~ of the computer monitoring ~~computer~~ database."

Response: The Department agrees with the proposed descriptive changes.

g. The applicant proposes to change the language in the averaging period. The proposed language is as shown below.

"The 3 hour average is the value used to verify compliance with the minimum ~~operational~~ firebox temperature."

Response: The Department agrees with the proposed descriptive changes.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.