**From:** Brad James
**To:** McWade, Tammy
**Subject:** RE: West Fraser Whitehouse - PSD Application Requested Clarifications
**Date:** Tuesday, June 10, 2014 6:49:03 PM

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Tammy,

Glad the clarification information previously provided was helpful for processing the permit application.

Regarding the maximum production rate identified in Table C-1, the data is not used in the emissions calculations included in the submitted PSD applicability analysis for the Whitehouse Mill kiln conversion project. Trinity completed several internal updates to the analysis due to the mill being identified by the DEP NE District Office as a existing PSD minor source, and removed the baseline emissions calculations that utilized the historical operation data included in Table C-1.

West Fraser can remove this table and re-submit the PSD applicability analysis as Table C-1 was not used in the calculations. The only data regarding historical operation to estimate associated emissions increases is included in Table C-9.

Let me know if you have any additional questions.

Best Regards,

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**Brad James, P.E.**
Managing Consultant

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**From:** McWade, Tammy [mailto:Tammy.McWade@dep.state.fl.us]
**Sent:** Friday, June 06, 2014 8:50 AM
**To:** Brad James
**Subject:** RE: West Fraser Whitehouse - PSD Application Requested Clarifications

That helps a lot! Thank you!

Can you clarify one more thing, the maximum production rate in Table C-1 provided by historical data.

Thank you for all your help!

Tammy

*Tammy T. McWade*
**Engineer Specialist IV**
**Florida Department of Environmental Protection**
**Division of Air Resource Management (DARM)**
**Office of Permitting and Compliance (OPC)**
**Phone: 850/717-9086**
**GIC: 59586**

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**From:** Brad James [mailto:BJames@trinityconsultants.com]
**Sent:** Thursday, June 05, 2014 2:56 PM
**To:** McWade, Tammy
**Subject:** West Fraser Whitehouse - PSD Application Requested Clarifications

Tammy,

Based on your questions, I wanted to provide the following clarifications regarding the Whitehouse Mill kiln conversion project. The updates are bold underlined font below.

- Application Narrative – page 1-1: The existing steam batch lumber drying Kiln 3 (EU003) structure will be modified with the existing 54 ft heating chamber extended to 80 ft, **and Kiln 3 will no longer be in service as the batch kiln equipment will be removed**. The other two (2) existing steam batch lumber drying kilns (EU001 – EU002) at the mill will **also** be removed and replaced by the new continuous drying Kiln 4. The other equipment to be removed includes the three (3) existing associated wood and propane-fired burners. The current burners **for all three existing kilns** will be removed and the two (2) new kilns will be direct fired with dry shavings burners with heat input capacities of 40 MMBtu/hr each.
- Application Narrative – page 2-3: Each new continuous kiln will be 80 ft long for the heating chamber. The existing steam batch lumber drying Kiln 3 (EU003) structure will be modified with the existing 54 ft heating chamber extended to 80 ft, **and Kiln 3 will no longer be in service as the batch kiln equipment will be removed**. The new continuous kilns will also include an additional 67 ft "Energy Recovery" chamber added at either end of the heat chamber (for total length of 214 ft for each kiln system). The other two (2) existing steam batch lumber drying kilns (EU001 – EU002) at the mill will be removed and replaced by the new continuous drying Kiln 4.

Therefore, no modification of Kiln No. 3, just the physical structure use for one of the two new continuous kilns. Therefore, no modified unit but a new kiln with potential emissions for the new kiln used in the PSD applicability analysis.

- Past Potential Throughput/Lumber Production Increase – Table C-9 (Appendix C): West Fraser estimated the past potential throughput for the three removed batch kilns (EU001 and EU003) based on the maximum monthly historical production and scaled to determine the annual value (by multiplying by 12) – 110 MMBF/yr (or 493,328 tpy of wood/lumber).

Therefore, this estimate accounts for "could have been accommodated" emissions from the past operations by using the maximum monthly historical production rate for the Whitehouse Mill. Please confirm the "discrepancy" you identified in our discussion regarding another annual kiln production rate used for the associated units (NOT MODIFIED) emissions increases for the proposed kiln conversion project.

Feel free to contact me with any additional questions.

Best Regards,

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**Brad James, P.E.**
Managing Consultant

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