



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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August 24, 2009

BUREAU OF AIR REGULATION

Ms. Susan DeVore, Project Engineer
Bureau of Air Regulation
Florida Department of Environmental Protection
Bob Martinez Building
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

Dear Ms. DeVore:

Thank you for sending the Prevention of Significant Determination (PSD) application for a proposed project at North Florida Lumber, Inc. in Bristol (Liberty), FL. The project consists of modifications to existing Kiln 2 to convert it from a batch process kiln to a triple length continuous kiln (TLK). Physical changes related to the project include increasing the length of Kiln 2 from 85 to 227 feet; adding a new motor control center, lumber carts, and fans; and making changes to the electrical room. The Florida Department of Environmental Protection has determined that the project is subject to PSD review for volatile organic compounds.

The Region 4 office of the U. S. Environmental Protection Agency (EPA) has reviewed the permit application, and has the following comments:

1. In reviewing the draft permit and preliminary determination, Region 4 finds that the permitting authority has not addressed $PM_{2.5}$ as a regulated New Source Review pollutant. If the PM_{10} surrogate approach is used, then the permitting authority should provide an adequate rationale to support the use of this approach for this project. The preliminary determination should contain an analysis as to whether or not PM_{10} is a reasonable surrogate for $PM_{2.5}$ under the facts and circumstances of the specific project at issue and not proceed with the general presumption that PM_{10} is always a reasonable surrogate for $PM_{2.5}$.

If you have any questions about these comments or require additional information, please contact Lorinda Shepherd at (404) 562-8435.

Sincerely,

Gregg M. Worley
Chief
Air Permits Section