

Date: December 20, 2004
To: Norbord Permit File
Subject: Meeting Notes

RE: Application No. 15812 – Title V/PSD Amendment for Norbord-Cordele

Attendees:

Norbord: Peter Quosai (EHS Manager from Canada), Phillip Towles (Regional Environmental Mgr – South Carolina), Avery Smith (Plant Manager – Cordele)

Trinity Consultants: Ryan Gesser (Managing Consultant), Andy Hixon (Consultant)

EPD/APB: Heather Abrams, John Yntema, Susan Jenkins, Richard Monteith

1. **Comment:** EPD would like to know the size of the IC engines (in BHP) to rule out (or in) the RICE MACT. In addition, Norbord must propose BACT for the “new” IC engines.

Response: At this time, Norbord is not able to know whether the plant expansion will include IC engines (for peaking and/or emergency use). Thus, they are unable to specify a maximum BHP for the IC engines. The IC engines listed in Section D1 of the Title V application may also include existing equipment.

Action: Norbord will identify which IC engines listed in Section D1 are new versus existing. Norbord will specify the maximum BHP for any new IC engine as well as the purpose of any new IC engine. Norbord will propose BACT for any new IC engine.

2. **Comment:** EPD would like some details regarding the generic fuel burning equipment listed in Section D3 of the Title V application in order to determine if it is, or is not subject to the Boiler MACT.

Response: At this time, Norbord is not able to know whether the plant expansion will include new “generic” fuel burning equipment.

Action: Norbord will identify which generic fuel burning equipment listed in Section D3 are new versus existing. Norbord will propose BACT for any new generic fuel burning equipment.

3. **Comment:** With regard to the proposed Energy System, EPD’s view is that it will be subject to Subpart Db and EPD does not believe that requesting a determination by EPA Region 4 would be of much use. If Norbord believes that the proposed system should not be subject to Subpart Db, EPD requests that Norbord submit a request to EPD for a determination that EPD can pass along to EPA, in order to obtain a timely determination. On the other hand, the Energy system appears to not be subject to the Boiler MACT.

Response: Norbord will acquiesce on the Subpart Db issue and agree to EPD's findings. In addition, Norbord agrees with EPD's findings regarding Boiler MACT applicability.

Action: No action necessary on the part of either EPD or Norbord.

4. **Comment:** EPD would like the capacity of the dryers to be more closely specified. Our reading of the application indicates that each dryer could range in size from 17 to 52 tons per hour in capacity. This range is too large and makes it hard to evaluate BACT

Response: The application requests authorization to construct and operate three dryers. Norbord anticipates a phased construction approach to the inclusion of dryers. Two dryers will be constructed first. Subsequently, a third dryer will be constructed. Norbord is unable to specify a per dryer capacity size/range at this time. The plant will be a "design" as your build plant. Norbord indicated that the "total" dryer input will be 52 tons per hour whether that is with two or three dryers. Norbord indicated that they would like a "flexible" permit that did not identify the number of size of the dryers. Norbord indicated that they would prefer a permit that set the maximum capacity to be dried at 52 tons per hour.

Action: Norbord will investigate the dryer capacity sizes based on current information.

5. **Comment:** With regard to the proposed Energy System, EPD would like to have a diagram of it, including all inputs of energy and where (and by what) energy is used (i.e., indicate pre-heaters and heat exchangers).

Response: Norbord indicated that the Energy System design will be much like the existing Energy System.

Action: Norbord will provide an updated discussion of the Energy System as well as a PFD of the system.

6. **Comment:** Please specify whether the thermal oil heater will be heated only by waste air from the Energy System or whether it will have its own separate burner.

Response: Nothing discussed.

Action: Norbord will provide the requested information.

7. **Comment:** With regard to the control system on the dryers, it would be easier for EPD to evaluate BACT if we knew whether Norbord is leaning towards using a wet or dry system and, if dry, whether it will be catalytic, regenerative or just thermal.

Response: At this time, Norbord is unable to specify the exact design features of the air pollution control system. They did volunteer that they are looking at either a TCO or an RTO for the dryers and board press. In addition they did volunteer that they are looking at a WESP immediately after the dryers.

Action: Norbord will further investigate the air pollution control system design. EPD will investigate the flexibility allowed under PSD regarding multiple control equipment options meeting BACT/being specified as BACT.

8. **Comment:** EPD is now reviewing a separate PSD application for a “green field” fiberglass insulation facility proposed to be built in Cordele by Owens Corning. EPA has noted that the facilities are only about 3 miles apart and has suggested that EPD make sure that any modeling done makes sure that additive effects are taken into considerations. This is not a request that Norbord do anything at this time, but a heads-up that we may need to do additional modeling.

Response: ok

Action: EPD will investigate the type of response generated for a similar EPA request. I believe that Washington County – Duke Sandersville and Tiger Creek is an example.