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Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch
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Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

JAN 06 2005

Mr. Phillip E. Towles
Regional Environmental Coordinator
Norbord Industries, Inc.
564 Woodyard Road
Kinards, South Carolina 29335

RE: Norbord Georgia OSB
 Cordele, Crisp County, Georgia
 Application No. 15812 Dated November 5, 2004

Dear Mr. Towles:

Norbord Georgia OSB ("Norbord") submitted a PSD application and Title V Amendment application to construct and operate a oriented strandboard (OSB) capable of producing 650 million square feet (on a 3/8" basis) at Norbord's existing OSB plant in Cordele, Georgia. Norbord has indicated that they want a construction permit by the end of the first quarter of 2005.

Norbord and EPD met on December 20, 2004 to discuss the status of EPD's review. In particular, both parties discussed EPD's questions posed to Norbord's consultant (Trinity Consultants), via electronic mail, on December 9, 2004. The December 9, 2004 questions pertained to information needed to perform rule applicability determinations as well as information needed by EPD to clarify the details of the plant design. The questions posed in the December 9, 2004 electronic mail were based on EPD's review of Sections 1, 2, and 4 and Appendix A of the application.

EPD has begun review of Section 5 of the application which pertains to Norbord's Best Available Control Technology (BACT) analysis. During our review of Section 5, we discovered several critical flaws and omissions that must be resolved before we can review the application. Our initial review has focused on the energy system/dryers combined stack for NOx and CO emissions. It has not addressed the other applicable air pollutants for the energy system/dryers combined stack as well as the other process equipment and the computer modeling (both PSD and air toxics). These items will be addressed, to the extent necessary, after you have submitted a complete application.

1. Class I Area Impacts

The application mentions the Class I Area that is within 200 km of the proposed source. However, it does not include any Class I Area impact analysis. In order to ensure that your analysis is done correctly, you should contact the FLM for the potentially affected Class I Area. Please note that EPD should be copied on any written correspondence that is exchanged between the source and the FLM. EPD will follow up with the FLMs located within 200 km of the proposed site to ensure that their concerns have been addressed.

2. Plant Design

As discussed in the December 20, 2004 meeting, please identify the anticipated auxiliary equipment (and its maximum anticipated size/output) to be included in the plant expansion. An example of auxiliary equipment is internal combustion engines and fuel-burning equipment.

Additional information needed includes: Would any new thermal oil heater include a natural gas burner of its own? If so, what is the size of the burner? Will any new rotary dryer include a natural gas burner of its own? If so, what is the size of the burner?

3. Best Available Control Technology (BACT) Analysis

The proposed plant expansion is subject to PSD review for NO_x, CO, VOC, PM, and PM₁₀. There are several critical flaws and omissions with Norbord's BACT analysis that must be resolved. The discovered flaws/omissions discovered thus far with Norbord's BACT analysis include the following:

- Technologies specified in Table 5-2 of the application do not include options chosen by Norbord as specified in Table 5-7.
- Section 5.4.2 is very hard to follow as Norbord did not document the technical feasibility of all options noted in Tables 5-2 and 5-7.
- The applicant did not identify a short-term BACT emission limit (lb/hr, lb/MMBtu, ppm, etc) for the control options identified as technically feasible on a per air pollutant and per emission unit basis.
- The applicant provided a hardcopy of their RBLC search; however, Norbord did not provide an analysis of this data (such as what is the lowest short-term emission rate permitted for an identical or similar operation). In addition, the hardcopy forms provided were un-readable because the font size was too small.
- The applicant did not provide any energy and environmental impact analysis per control option per air pollutant per emission unit.
- The applicant did not provide an economic analysis for each control option per air pollutant per emission unit.
- The applicant did not provide a BACT analysis which supports the verbal request posed in the December 20, 2004 meeting. That is, to receive a PSD permit that authorizes several different control options for the applicable stacks.
- Norbord proposed short term and annual BACT emission limits per air pollutant per emission unit. Norbord did not propose an averaging period for each short term BACT emission rate. In addition, Norbord did not clearly specify whether the VOC BACT limit is on a carbon, propane, etc basis?

4. Title V Application

A cursory review of Norbord's Title V Amendment application has been performed.

- How does Norbord intend on verifying compliance with the short and long term BACT emission limits?
- What Reference Test Methods does Norbord propose?

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5. Conclusion

Please submit a response to the questions posed in this letter by February 15, 2005. If the above items are not addressed by February 15, 2005 (EPD may reconsider if it is clear that they are in the process of being addressed in an expeditious manner), then we plan to return the application to you. Your attention to this matter is appreciated. If you have any questions, you may contact me at 404/363-7143.

Sincerely,

A handwritten signature in black ink that reads "Susan Jenkins". The signature is fluid and cursive, with the first name "Susan" and last name "Jenkins" clearly legible.

Susan Jenkins
Environmental Engineer
Stationary Source Permitting Program