



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 30 2015

REPLY TO THE ATTENTION OF:

Ms. Kristin Hart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Hart:

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) draft construction permit for Louisiana Pacific Corporation- Hayward. (#14-DCF-189). The proposed project revises the Best Available Control Technology (BACT) requirements in order to reroute emissions from existing wood fired thermal oil heater stacks to wafer dryers controlled using cyclones, wet electrostatic precipitators and regenerative Thermal oxidizers. In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

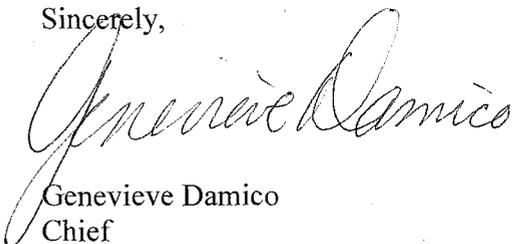
1. The permit proposes that the thermal oil heaters (TOHs) retain their original numeric emissions limitations while being rerouted to vent through the wafer dryers, cyclones, wet electrostatic precipitators and regenerative thermal oxidizers to existing stacks S14 and S24. The preliminary determination document states that the Permittee can continue to meet the original emission limits for stacks S14 and S24 which were developed when only the wafer driers and control devices were vented to the stacks and these limits are retained in the permit. In most cases, the limits for the TOHs are more stringent than those of the stacks. WDNR proposes to demonstrate compliance with the limits for the TOHs by performing compliance emission testing from stacks S14 and S24 when burning wood fuel in the TOHs and directing emissions to the operating line 1 dryers and control systems. The compliance demonstration further requires that "The process shall be capable of operating the TOHs and control equipment alone, while not operating the dryers (if requested)". EPA believes that as written, the compliance demonstration is not practically enforceable. The emissions limitations for the TOHs are more stringent than the limits for the emissions from the stacks. It is possible that emission testing performed at the stack while the dryers are operating could show an exceedance of the TOH limits and it would be impossible to determine whether it was the emissions from the TOH or the emissions from the dryers that caused the stack emissions to exceed the TOH emission limits. While the permit specifies that the Permittee must be capable of operating the TOHs and control equipment alone, it is not clear when this would be required by the department. To improve practical enforceability of the emission limitations and improve transparency, EPA suggests that WDNR specify that the Permittee be required to perform compliance emissions testing of the TOHs and control equipment

alone, while not operating the dryers, in the event that any of TOHs' emissions limitations, as measured at the stack, are exceeded when the dryers are operating.

2. On page 15 of the draft permit, the compliance demonstration for carbon monoxide for boilers 11 and 12 does not specify whether the driers and control device need to be operating when compliance emission testing occurs. Please clarify whether they should be operated during testing or explain why it is not necessary for them to operate.
3. Section E of the draft permit contains emission limitations from Stacks S14 and S24, which will include emissions from the TOHs along with the emissions from the wafer dryers. The compliance demonstration requires the Permittee to perform compliance emission testing of emissions from "the dryer system, when burning wood fuel," to demonstrate compliance. The heading for the section states that, "each dryer system (Line 1 and Line 2) consists of two wafer dryers with burner units that fire wood fuel or distillate fuel oil. Each dryer system is controlled by primary cyclones, a wet electrostatic precipitator and a thermal oxidizer in series. The thermal oil heaters exhausts from each line shall be directed to the dryers...". From this description of the dryer system, it is unclear if the TOHs are considered to be part of the dryer system and if they are required to operate while compliance emission testing is performed. Is it physically possible for the dryers to operate while the TOHs are not operating? If the dryers are able to operate without the TOHs operating, please clarify that during the compliance emission testing, both the dryer systems and the TOHs must be operated.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,



Genevieve Damico
Chief
Air Permits Section