



Southern Reporting, Inc.

Transcript of
Public Hearing

11/16/2010

In Re: Draft Proposed Part 70 Air Quality Title V
Operating Renewal permit for Roseburg Forest
Products South, L.P. (Holly Hill MDF)
10-057-TV-RE and 10-078-TV-RE-H

COPY

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APPEARANCES

DHEC officials present:

Richelle Tolton
Elizabeth Basil
Katharine Buckner
Soraya Purvis
Tim Pearson
Jennifer Hughes

Roseburg Forest Products South,
L.P. officials present:

Gene Ling
Scott Cross

Roseburg Forest Products South,
L.P. officials present via
telephone:

Ellen Porter
Kristana Lee

PROCEEDINGS

1
2 THE HEARING OFFICER: Good evening. It is now 6:35 on
3 Tuesday, November 16th, and this public hearing
4 regarding the Draft Proposal Part 70 Air Quality
5 Title V Operating Renewal Permit for Roseburg
6 Forest Products South, L.P., Holly Hill MDF, is now
7 called to order. For the record, this facility is
8 located at 1972 Gardner Boulevard, Highway 453 --

9 MR. LING: Ellen --

10 THE HEARING OFFICER: -- in --

11 MR. LING: -- I'm going --

12 THE HEARING OFFICER: -- Holly Hill --

13 MR. LING: -- to put you on speaker phone, okay?

14 THE HEARING OFFICER: -- South Carolina and here -- here
15 in Orangeburg County.

16 On behalf of the Department of Health and
17 Environment Control, DHEC, I welcome you and thank
18 you for taking the time to come here this evening.
19 My name is Richelle Tolton, and I am the regional
20 community liaison for DHEC's Environmental Quality
21 Control Office. Tonight I will be serving as
22 hearing officer.

23 Before I go any further, I have a few items to
24 address. First, I ask that you please turn off
25 your cell phone or switch it to vibrate so that you

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1 do not disturb others during the hearing. Next, if
2 you have not already done so, I encourage each of
3 you to sign the attendance sheet located at the
4 sign-in table. By signing in, this will ensure
5 that DHEC has a complete record of all attendees at
6 this hearing. We have asked for your mailing or
7 e-mail address on the sign-in sheet so that we can
8 notify you of any future information regarding
9 Roseburg Forest Products. Third, when you sign in,
10 you should've -- when you signed in, you should've
11 received a folder with information pertaining to
12 the hearing. If you did not receive one of these,
13 please raise your hand and our staff will bring you
14 a folder. In this folder there are various pieces
15 of information you may find useful, including an
16 agenda for this hearing, a list of DHEC staff with
17 their contact information, and a pre-addressed
18 comment form should you need it.

19 Next, I would also like to point out our court
20 reporter who is seated here, and she will be
21 responsible for preparing a written report of the
22 formal part of this hearing. This transcript will
23 serve as the official record of this public
24 hearing. If at some later time you're interested
25 in reviewing this record of tonight's hearing, you

1 may request to see it.

2 Let it be known that two representatives from
3 Roseburg's environmental office are joining the
4 hearing via cell phone speaker.

5 And then, moving forward, the purpose of this
6 hearing is to provide a formal opportunity for you
7 to give us your verbal and written comments. This
8 is also an opportunity for DHEC staff and
9 representatives of Roseburg Forest Products to
10 present information to you about the draft permit.
11 It is important that you know that the requested
12 air permit has not been approved and is still in
13 draft form. This decision to grant or deny this
14 permit has not been made at the -- the time of this
15 hearing. All comments received will be reviewed by
16 DHEC staff prior to making a permit decision, so
17 your input is very important. A decision as to
18 whether or not the air permit will be approved,
19 modified, or denied will not be made tonight during
20 this hearing.

21 We recognize many of you may have concerns and
22 questions regarding this draft permit. The
23 comments you share may provide DHEC staff with
24 additional ideas or thoughts about this draft
25 permit. Please understand that this is not a

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1 question-and-answer session. This is considered a
2 formal hearing where comments made will be
3 recorded. To ensure that everyone has an
4 opportunity to be heard, questions will not be
5 answered by DHEC staff during the formal hearing.

6 Please note that the draft permit has been
7 written to ensure that Roseburg Forest Products can
8 continue to operate in compliance with state and
9 federal air quality regulations. These regulations
10 are in place to protect human health and welfare
11 and to ensure that air quality standards are
12 maintained.

13 We welcome your comments this evening. If you
14 plan to make oral comments, you should've noted
15 this on the sign-in sheet. If you're unsure at
16 this time if you will be making an oral comment,
17 that's okay too. I will call on everyone who's
18 indicated that they do want to comment first, and
19 then I'll give anyone else who has not had a chance
20 to speak tonight an opportunity to come forward.
21 Written comments are also welcome and may be given
22 to me tonight or you may submit them directly to
23 DHEC. All written comments must be received no
24 later than close of business on November 23rd.
25 Again, that date is November 23rd, 2010.

1 If you have questions relating to submitting
2 written comments, please see a DHEC staff member
3 before you leave. In order for tonight's hearing
4 to move forward in a timely and orderly fashion, I
5 would like to cover some guidelines that have been
6 established. There will be no cross-examination or
7 questions answered while the presentation or
8 comment is being made. I, however, reserve the
9 right to ask a speaker to clarify a point.

10 All comments tonight -- actually, this is a
11 little different. We can make the comments from
12 the location that you're seated or come up here.
13 Just -- we want to just have you close to the
14 microphone so that they can be recorded, or we can
15 bring a microphone to you if you want to stay
16 seated since we're in such a small area, and as
17 long as we get it near the -- the recording device
18 for the court reporter.

19 So that everyone has an opportunity to speak,
20 your comments should be -- should not exceed more
21 than five minutes per individual. Please remember
22 that the quality of what each person is saying is
23 what's important tonight, not how many people say
24 the same thing.

25 For this hearing we will proceed in this

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1 order: Ms. Katharine Buckner with DHEC's air --
2 Bureau of Air Quality will explain the department's
3 draft permit, a presentation being made by Mr. Gin
4 -- Gene Ling and Mr. Scott Cross for Roseburg
5 Forest Products, and then I will call on
6 individuals who have indicated on the sign-in sheet
7 that they would like to comment. Speakers will be
8 heard in the order in which they signed in. And
9 then anyone who has decided during the course of
10 the evening that they would like to make a comment
11 but did not indicate so when they signed in will be
12 called upon by random by raising their hands.
13 Please remember that this is the only time for
14 those who have not yet spoken.

15 Before making your comment, I would ask that
16 each of you clearly state your name and group
17 you're representing, if there's any, and -- for the
18 court reporter. If you have a written copy of your
19 comments and don't mind leaving it with us, please
20 give it to me when you have finished speaking.
21 Should any statements begin to digress from the
22 intent of this hearing, I will interrupt the
23 speaker and ask him or her to limit their comments
24 to the technical issues -- issues regarding this
25 draft permit.

1 I ask that each speaker allow -- be allowed to
2 present his or her views without interruption. I
3 will not allow disruptions to alter the intent of
4 this hearing. Each person who's requested to
5 participate here tonight must be given a fair
6 opportunity to provide his or her presentation or
7 comment.

8 Okay. I will now call on Katharine with the
9 Bureau of Air Quality who will be -- give a brief
10 overview of the draft DHEC -- permit -- has written
11 for this proposed project.

12 MS. BUCKNER: Good evening. I'm Katherine Buckner with
13 the Bureau of Air Quality within South Carolina
14 Department of Health and Environmental Control.
15 This evening I'm going to discuss the renewal of
16 Roseburg Forest Products' Title V Operating Permit.
17 Tonight I will talk about --

18 MS. BASIL: (To Ms. Buckner) Slow down.

19 MS. BUCKNER: Okay. Sorry.

20 Tonight I will talk about the purpose of a
21 public hearing and the reason for this hearing, the
22 Title V Air Operating Permit Program, the
23 operations at the facility and the associated
24 emissions, Roseburg's regulatory history, and a
25 discussion of the changes at the facility since the

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1 last Title V Operating Permit was issued.

2 MS. BUCKNER: (To Ms. Basil) Okay.

3 MS. BUCKNER: I'll also discuss the draft permit,
4 including which regulations apply to this facility,
5 how the facility will comply with those
6 regulations, and any potential future requirements
7 for Roseburg, a discussion of chromium emissions
8 from this facility, applicable regulations, and
9 compliance with these regulations, and information
10 on how to submit comments or questions to DHEC
11 about the renewal of the permit.

12 MS. BUCKNER: (To Ms. Basil) Okay.

13 MS. BUCKNER: The purpose of a public hearing is to
14 accept written comments from the community and
15 interested parties and to provide an opportunity to
16 record oral comments. This meeting is being held
17 during the public comment period that started
18 October 13th, 2010, and will close November 23,
19 2010. DHEC previously held a 30-day public comment
20 period from July 21st to August 19th, 2010. During
21 the public comment period, the Bureau of Air
22 Quality received a request for a public hearing as
23 well as a written comment about hexavalent
24 chromium, which is also called "Chromium VI."
25 Later I'll talk about the emissions from this

1 facility, including the amount of hexavalent
2 chromium that may be emitted.

3 MS. BUCKNER: (To Ms. Basil) Okay.

4 MS. BUCKNER: The Title V Program was developed when the
5 Clean Air Act was amended in 1990. It is called
6 "Title V" because that is the section where it is
7 in the Clean Air Act. Its purpose is to make the
8 Clean Air Act more effective and easily
9 enforceable. Title V Permits are federally
10 enforceable, and DHEC has the responsibility of
11 overseeing the Title V Program in South Carolina.
12 It does this by listing all regulations that apply
13 to the source as well as requirements to show how
14 the facility's complying with these regulations.
15 In short, a Title V Permit includes all applicable
16 state and federal regulations, all pollutant and
17 emission limitations, and any required testing,
18 monitoring, record keeping, and reporting.

19 MS. BUCKNER: (To Ms. Basil) Okay.

20 MS. BUCKNER: Currently, Roseburg is not operating. The
21 facility has not operated since December 2008;
22 however, they can begin operating again at any time
23 under the current Title V Permit. Roseburg
24 manufactures 3/4 inch fiberboard panels. The
25 fiberboard panels are created through a process of

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1 mixing, drying, gluing, and pressing of green-wood
2 chips and plywood trim. The fiberboard panels are
3 finished by various sawing and sanding operations.
4 A boiler that uses wood waste for fuel provides
5 steam for the dryers and press.

6 The main emissions from this facility are
7 particulate matter, hazardous air pollutants,
8 called "HAPs," and volatile organic compounds,
9 called "VOCs." Particulate emissions come from all
10 of the operations at the facility, from conveying
11 raw materials, sawing and sanding operations, to
12 the boiler. Wood naturally contains some hazard
13 air pollutants, which can also be called "toxic air
14 pollutants" and "VOCs." These pollutants are
15 emitted when the wood chips are dried, the wood
16 fiber is pressed, and the wood waste is burned in
17 the boiler. HAPs and VOCs are also emitted from
18 the resins used to glue the fibers together. Other
19 emissions from wood burning and -- are sulfur
20 dioxide, carbon monoxide, and nitrogen oxides.
21 Chromium, a toxic pollutant, is also emitted from
22 the boiler.

23 The facility uses two multiclones and an
24 electrostatic precipitator to control particulate
25 emissions from the boiler. A bioscrubber is used

1 to control toxic pollutants and VOCs, such as
2 formaldehyde, from the two dryers and the press.

3 MS. BUCKNER: (To Ms. Basil) Okay.

4 MS. BUCKNER: The initial Title V Permit for this
5 facility was issued in September 2002 to Georgia
6 Pacific Corporation. Roseburg Forest Products
7 acquired the facility in August of 2006. This
8 renewal of the Title V Permit will contain all
9 applicable regulations. The renewal will also
10 reflect the changes at the facility since the last
11 operating permit was issued.

12 MS. BUCKNER: (To Ms. Basil) Okay.

13 MS. BUCKNER: Since the last Title V Operating Permit
14 was issued, some changes have occurred at the
15 facility. In December of 2007, Roseburg was
16 granted permission to enclose the press and install
17 a bioscrubber. The press was enclosed so that the
18 emissions could be captured and sent to the
19 bioscrubber. The bioscrubber controls toxic
20 emissions from two existing dryers and the new
21 press enclosure.

22 In 2008, the facility was approved to
23 construct a sander-dust reinjection system with a
24 new cyclone. Sander dust is the dust generated
25 from the various sawing -- or sanding operations at

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1 the facility. The facility has been burning the
2 sand -- had been burning the sander dust in the
3 boiler. The project allowed the facility to
4 recycle the sander dust produced at the facility
5 and reuse it in the board production process as
6 wood fiber.

7 MS. BUCKNER: (To Ms. Basil) Okay.

8 MS. BUCKNER: Other changes to the Title V Permit
9 include the bag -- the bag filters and cyclones
10 were reclassified as process equipment and not
11 control equipment. The equipment connected to the
12 bag filters and cyclones cannot operate without
13 these devices in place and operating and, so are
14 considered part of the process.

15 Two exemptions and a minor change were
16 incorporated into the draft renewal -- Title V
17 Renewal Permit. An existing bag filter was
18 replaced with another bag filter, exhaust from a
19 pressure relief valve was rerouted, and the
20 replacement of two open conveyors with enclosed
21 conveyors.

22 Some items have been removed from the permit.
23 A cleanup conveying system and cyclone that is part
24 of the Bark/Fines conveying system was removed from
25 the facility, and a collocated sawmill facility was

1 shut down, so references to this facility were
2 removed from the permit.

3 MS. BUCKNER: (To Ms. Basil) Okay.

4 MS. BUCKNER: As I said earlier, the Title V Permit
5 covers any federal or state regulations that apply
6 -- that the facility is subject to. Briefly, I
7 will discuss Roseburg's regulatory applicability.
8 The facility's wood waste boiler is subject to fuel
9 burning regulations, which limit its opacity,
10 particulate, and sulfur dioxide emissions. The
11 fuels permitted for use in the boiler are wood
12 waste, and bark, board trim, green fines, sander
13 dust, wood fiber, and used oil mixed with wood
14 waste.

15 The facility must demonstrate compliance with
16 the Ambient Air Quality Standards, which are set to
17 protect the public health and welfare. Compliance
18 with the Ambient Air Quality Standards is
19 demonstrated by modeling the emissions from the
20 facility. This facility has previously shown
21 compliance with these standards for their
22 operations. Since the facility has not been
23 operating, modeling was not performed for this
24 renewal. A condition in the Title V Permit
25 requires the facility to -- facility to update

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1 modeling prior to starting up any source.

2 The facility is allowed to combust in the
3 boiler waste oils that have been generated on site.
4 Burning this waste oil makes them subject to waste
5 combustion and reduction regulations and waste oil
6 analysis requirements. This regulation limits the
7 amount of metals and hydrochloric acid in the
8 waste.

9 The Process Industries Regulation limits
10 opacity, which is the amount of smoke or dust that
11 impairs your vision, and particulate matter
12 emissions from various wood operations at the
13 facility.

14 MS. BUCKNER: (To Ms. Basil) Okay.

15 MS. BUCKNER: The facility must demonstrate compliance
16 with the Toxic Air Pollutants Regulation, which are
17 set to protect the public health and welfare.
18 Compliance with the Toxic Air Pollutants Regulation
19 is demonstrated by modeling the emissions from the
20 facility. This facility has previously shown
21 compliance with these standards for their
22 operations. Because the facility has not been
23 operating, updated modeling for toxic air
24 pollutants was not performed for this renewal. The
25 facility is required to demonstrate compliance with

1 modeling prior to starting up any sources.

2 Two dryers and the press are subject to a
3 federal regulation that controls emissions from
4 plywood and composite wood operations. The federal
5 regulation, also known as "Maximum Achievable
6 Control Technology" or "MACT," is required by the
7 Clean Air Act to reduce toxic emissions from
8 specific wood processes. The Plywood and
9 Composites Wood MACT requires the facility to
10 control formaldehyde emissions from the two dryers
11 and the press by 90 percent. The facility
12 installed a bioscrubber to comply with this
13 regulation.

14 Another -- another regulation that may apply
15 to Roseburg in the future is the Boiler MACT.
16 Currently, the Boiler MACT is a proposed rule by
17 the U.S. EPA and is not a final regulation. Under
18 the proposed regulation, emission limitations on
19 particulate matter, carbon monoxide, hydrochloric
20 acid, dioxin, furans, and mercury will be required
21 for the boiler at Roseburg. The proposed Boiler
22 MACT also prescribes continuous monitoring of
23 particulate and carbon monoxide, performance
24 testing, an energy assessment, and appropriate
25 monitoring, record keeping, and reporting to

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1 demonstrate compliance with the limits set forth --
2 forth in this regulation. Again, this rule is
3 currently proposed and is not final. Once
4 finalized, the boiler will have -- likely have
5 three years to comply with any limits.

6 MS. BUCKNER: (To Ms. Basil) Okay.

7 MS. BUCKNER: The facility is required to conduct
8 various tasks to ensure that it continues to meet
9 the requirements of the regulations. For example,
10 the -- the facility is required to continuously
11 monitor the smoke, also known as "opacity," from
12 the wood waste boiler using a continuous opacity
13 monitor. The facility is required to test the
14 boiler every two years to ensure that the
15 particulate emissions are within the limits
16 specified in the permit. The facility must also
17 monitor the operation of the electrostatic
18 precipitator to ensure that it is proper --
19 properly operating and controlling particulate
20 emissions from the boiler. The facility is also
21 required to analyze the used oil that is burned in
22 the boiler and record the amount of used oil that
23 burned on a weekly basis.

24 To meet the requirements specified in the
25 Plywood and Composite Wood MACT and reduce

1 formaldehyde emissions, the facility installed a
2 bioscrubber to control emissions from the two
3 dryers and the press. The facility is required to
4 -- to conduct source tests of the bioscrubber in
5 the summer and winter to establish operating
6 temperature ranges. The temperature will be
7 continuously monitored, recorded, and reported
8 semiannually. Also, the Plywood and Composites
9 MACT -- Wood MACT requires the facility to use non-
10 HAP coatings for their various coating operations.

11 The permit also requires record keeping and
12 semiannual reporting of visual inspections and
13 quarterly reporting of monthly production records.
14 The facility must also do a Title V Annual
15 Compliance Certification. In this certification,
16 the facility must list each requirement in the
17 permit and certify how they have met that
18 requirement.

19 MS. BUCKNER: (To Ms. Basil) Okay.

20 MS. BUCKNER: As I mentioned before, a written comment
21 was received by the bureau about chromium emissions
22 from this facility. A specific type of chromium
23 called "hexavalent chromium" or "Chromium VI"
24 occurs naturally in wood. This pollutant is
25 considered a hazardous or toxic air pollutant.

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1 This boiler is -- the boiler at this facility burns
2 wood waste and used oil, both of which can produce
3 chromium emissions. The potential emissions of
4 Chromium VI from the boiler are .0012 pounds per
5 hour or the equivalent of .005 tons per year.

6 Since Chromium VI is a toxic -- toxic
7 pollutant, Roseburg is required to demonstrate
8 compliance with the Toxic Air Pollutants Regulation
9 for this pollutant. The Toxic Air Pollutants
10 Regulation is set to protect the public health and
11 welfare. Compliance with the Toxic Air Pollutants
12 Regulation is demonstrated by modeling the
13 emissions from the facility or by demonstrating
14 emissions are at or below a de minimis level.
15 However, the facility did demonstrate compliance by
16 showing that the Chromium VI emissions are below
17 the de -- de minimis levels for the Toxic Air
18 Pollutant Regulation. The de minimis level is a
19 level at which air dispersion modeling would not be
20 required if the facility-wide emissions for a
21 specific pollutant were below this level. The de
22 minimis level for Chromium VI is .03 pounds per
23 day. The estimated potential Chromium VI emissions
24 from this facility are .029 pounds per day.

25 The Chromium VI emissions discussed thus far

1 are potential emissions and are based on EPA
2 emission factors. A better indicator of the actual
3 emissions from a facility is to conduct a stack
4 test. A stack test conducted in 2003 showed that
5 total chromium emissions, which includes Chromium
6 VI, to be .0004 pounds per hour, which is less than
7 the potential emissions. For comparison purposes,
8 if you multiply the total chromium result from the
9 stack test by 24 hours per day, you get
10 .0096 pounds per day, which is much less than the
11 de minimis level for Chromium VI, which is
12 .03 pounds per day.

13 MS. BUCKNER: (To Ms. Basil) Okay.

14 MS. BUCKNER: DHEC does several things to try to help
15 ensure that facility -- that a facility is
16 operating in compliance. The source evaluation
17 section reviews and requires approval of all stack
18 test plans, can attend the stack test, and reviews
19 the results of the test. The boiler was tested in
20 2003, 2005, and 2007 for the compliance with
21 Standard 1 Particulate Limit. All of these tests
22 showed compliance with the particulate limit. The
23 facility has a compliance agreement with DHEC that
24 upon restart of the facility a source test will be
25 conducted to show compliance with the Plywood and

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1 Composites Wood MACT.

2 The regional office and the air toxic sections
3 conduct inspections of the facility. Since the
4 issuance of the Title V Permit in 2002, inspections
5 of this facility were conducted in 2003, 2004,
6 2005, 2007, and 2008. No violations have been
7 observed during any of these comprehensive
8 inspections.

9 The technical management section reviews
10 periodic reports, including Title V Annual
11 Compliance Certifications, as required by a
12 facility's permit. Roseburg's periodic reporting
13 has been timely. The facility has noted minor
14 deviations in their annual compliance
15 certifications since 2004. However, they have
16 implemented actions to correct these deviations,
17 and no enforcement referrals have been made of
18 these deviations.

19 MS. BUCKNER: (To Ms. Basil) Okay.

20 MS. BUCKNER: The regional office also handles all
21 complaints and investigates them. There have been
22 no complaint investigations for this facility
23 during this Title V Period, since 2002. The
24 facility has also -- also has a compliance
25 agreement with South Carolina DHEC to retest the

1 bioscrubber to demonstrate compliance with the
2 Plywood and Composite Wood MACT after start up of
3 the facility.

4 MS. BUCKNER: (To Ms. Basil) Okay.

5 MS. BUCKNER: If you should have any comments on the
6 Title V Operating Permit, please feel free to
7 contact me at the address or phone given here. If
8 you have other questions or concern, you may
9 contact the local DHEC air person listed here, Tim
10 Pearson.

11 MS. BUCKNER: (To Ms. Basil) Okay.

12 MS. BUCKNER: Comments made during and after the public
13 hearing may be considered when making a decision
14 regarding the draft permit. Written comments must
15 be submitted and received before the close of the
16 business day on November 23rd, 2010. All comments
17 should include the facility name. The draft permit
18 and statement of basis along with the public notice
19 can be viewed through November 23rd at the Web site
20 given here, and please submit your comments to
21 Soraya Purvis at the address listed here.

22 Thank you.

23 THE HEARING OFFICER: Thank you.

24 Okay. I -- now I would call on Gene and
25 Scott. They will be giving a presentation on

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1 behalf of Roseburg Forest Products.

2 MR. LING: Good evening. My name's Gene Ling. I'm the
3 plant manager at the Roseburg, Holly Hill facility.
4 Thank you for being here tonight. Want to give you
5 a little background on Roseburg.

6 MR. LING: (To Ms. Basil) If you go to the
7 next slide.

8 MR. LING: Roseburg is a West Coast-based company. It
9 manages vast timberlands, thousands of acres of
10 land, and produces a variety of forest products,
11 which include hardwood plywood, softwood plywood,
12 engineered lumber, particleboard, and, of course
13 the Holly Hill MDF facility. It also operates the
14 largest sawmill in North America, which is one of
15 the largest ones I've ever seen. But one thing I
16 do want to mention that's not in this presentation
17 is that, you know, Roseburg has a set of core
18 values. And since I've been with them in 2006,
19 they have done an excellent job of living up to
20 those values, and one of those is commitment to the
21 community. Couple of examples of this is: Just
22 the Holly Hill facility has donated computers,
23 printers, school supplies to the local community
24 schools and churches. And we also have an internal
25 employee giving campaign where people pledge their

1 wages, a certain amount, whatever amount they want
2 to donate. We just closed it for this year, just
3 the employees have donated over \$412,000 to
4 primarily United Way, but other charities such as
5 Special Olympics, Boys' Homes, Boy Scouts. So --
6 and our owner also does a partial match, so we
7 estimate that we'll donate almost \$700,000 this
8 year. And last year was close -- it was just a
9 little bit less than that. So they truly do
10 exercise the -- that value.

11 They also are committed to the environment.
12 We've started up what's called an "environmental
13 management system." Not only to -- we want to be
14 compliant, but we want to make sure that our
15 employees understand what they're doing on a day-
16 to-day basis.

17 Moving on, Roseburg wanted to improve their
18 market position, so they expanded it into the east
19 as it was mentioned earlier. We -- they purchased
20 multiple particleboard facilities, laminating
21 facilities. Laminating facilities are in
22 Mississippi and Orangeburg, South Carolina, and of
23 course, the Holly Hill MDF facility.

24 Give you a little background on Holly Hill
25 MDF. It was built in 1974 by the Holly Hill Lumber

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1 Company. Then it was purchased in 1980 by Georgia
2 Pacific. As I mentioned, it was acquired by
3 Roseburg in December of 2006. It employed
4 approximately 125 at -- at a peak load. Of course,
5 it goes up and down with economic conditions. But,
6 unfortunately, the economic conditions, as we've
7 seen in many other industries, forced us to curtail
8 in December of 2008. However, you know, it's very
9 important that we maintain the -- the activity of
10 our permit -- our Title V Permit until we make a
11 permanent decision to close the plant. I mean,
12 it's sitting idle, but it's under a curtailment
13 mode.

14 They've already kind of gone through our
15 process, but in general, the process at Holly Hill
16 involves taking raw material, such as chips,
17 sawdust, shavings, plytrim and breaking them into
18 fiber by pressurized refining. A wood-fire boiler
19 supplied steam to the refiners. Dryer turbines,
20 which drove the fans and the press heat itself.
21 There were four pressurized refiners. They reduce
22 the raw material into a fiber and then resin was
23 added and then blown into the dryer.

24 Two -- there were two flash tube dryers, which
25 reduce the moisture content down to a desired

1 level, typically, around 10 percent.

2 After that we formed a mat and pressed it to
3 make a medium-density fiberboard master panel. All
4 the emissions that we generated, as they mentioned,
5 from the dryer and the press were filtered back
6 through a bioscrubber. These panels were cut and
7 sanded and shipped to secondary manufacturers such
8 as RTA Furniture, kitchen cabinet doors, MDF
9 moldings, general use. So if you went to Lowe's
10 and Home Depot you might see MDF that you might
11 want to make a speaker cabinet with. Or if you're
12 renovating a house, you've probably seen MDF
13 moldings. They're a little cheaper than solid
14 moldings. And kitchen cabinet doors. Most -- most
15 everybody has MDF in their house in some capacity.
16 Holly Hill made one of the best MDFs for that
17 purpose.

18 MR. LING: (To Ms. Basil) Okay.

19 MR. LING: Scott's going to come up and talk to you a
20 little bit about hexavalent chromium.

21 MR. CROSS: Good evening. My name's Scott Cross. I'm
22 from the Vienna, Georgia plant, which is a Roseburg
23 facility that manufactures particleboard. At that
24 facility I'm the environmental coordinator, which
25 is to say my job is mainly record keeping,

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1 monitoring, and environmental duties related to a
2 manufacturing facility.

3 As far as hexavalent chromium is concerned,
4 again, it's been already stated that it's also
5 known as "Chromium VI." It's a naturally occurring
6 substance or element. The potential air emissions
7 at Holly Hill included hexavalent chromium from the
8 hogged fuel boiler.

9 MR. CROSS: (To Ms. Basil) And the next --
10 okay.

11 MR. CROSS: The chimney -- or as referred to in the
12 industry as a "stack" -- at Holly Hill is
13 controlled by two sets of multiclones followed by
14 an ESP or electrostatic precipitator, which was
15 already mentioned, to control particulate emissions
16 or dust and smoke.

17 Hogged fuel covers a very wide range of
18 material that can be used as a source of energy.
19 Wood encompasses a number of sources, such as bark,
20 wood sticks, sawdust, sander dust, over- and
21 undersized wood chips rejected from the process,
22 whole-tree chips, and scrap pallets. This diagram
23 is just basically showing a real simplified process
24 for generating steam. It's basically the same
25 concept as when you put a pot of water on your

1 stove and -- and start -- once it gets above 212,
2 water starts driving off of the pot. This is the
3 same concept, except this steam that's coming off
4 the pot is captured and sent to another part of the
5 process or equipment to generate heat, so it's the
6 same concept.

7 MR. CROSS: (To Ms. Basil) Okay.

8 MR. CROSS: Again, potential emission calculations --
9 you know, most air emissions are calculated based
10 on published emission factors rather than actual
11 testing results. In general, testing is complex
12 and expensive. Costs can range between 5 and
13 \$30,000, depending on the complexity of the test.
14 And boilers must be tested biannually for
15 particulate matter or smoke or dust. Hexavalent
16 chromium emissions are based on public emission --
17 publicized emission factors. In the calculation at
18 the bottom of the screen, the three -- 330 --
19 333.6 million Btu per hour comes from the boilers'
20 nameplate. That's the rated capacity. That's how
21 -- that's the unit of measure that they -- industry
22 uses to signify how much -- how -- how big or the
23 size of a boiler is for potential capacity can be
24 used in a process. The 00000.35 [sic] pounds of
25 Chromium VI per million Btu or 3.5 times ten to the

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1 negative six that is an emission factor that's --
2 that comes from AP-42 the Fifth Edition, which was
3 in September of 2003.

4 The AP-42 has been published since 1972 and is
5 the primary compilation of EPA's emission factoring
6 information. It contains emission factors and
7 process information for more than 200 air pollution
8 source categories. A source category is a specific
9 industry sector or group of similar emitting
10 sources. The emission factors have been developed
11 and compiled from source test data, material
12 balance studies, and engineering estimates. And,
13 again, it was already mentioned that the -- Georgia
14 Pacific tested this boiler in 2003 and indicated
15 much lower levels: The .0004 pounds per hour
16 compared to the standard or the allowable.

17 MR. STONE: (To Ms. Basil) Okay.

18 MR. STONE: And the last line is just a -- a reference
19 to where you can find more information about
20 AP-42 and emission factors. The EPA's Web site
21 address there -- the URL is there. And on the
22 EPA's Web site, in addition to just AP-42, is a
23 vast amount of information related to this topic.

24 Thank you.

25 THE HEARING OFFICERS: Thank you.

1 This concludes the presentations by DHEC and
2 the facility regarding the draft permit. Now we'll
3 ask anyone who has decided during the course of the
4 evening that they would like to make a statement to
5 please raise your hand.

6 All right. Seeing none, the comment portion
7 of this public hearing is now concluded.

8 Before we adjourn this hearing, I would like
9 to explain the process that DHEC will follow in
10 making a decision on the draft permit. Following
11 this public hearing and formal comment period, DHEC
12 will make a decision as to whether the permit --
13 the draft permit should be approved, approved with
14 conditions, disapproved, or modified. This
15 decision will be based upon the review and
16 consideration of the applicable state and federal
17 air quality regulations, the review of comments
18 made at this hearing in the form of a transcript,
19 the review of all other comments received within
20 the required time frame, and the consideration of
21 any other pertinent information.

22 As stated earlier tonight, written comments
23 may be submitted through close of business on
24 November 23rd, 2010. All written comments received
25 on or before this date will be considered as part

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1 of the decision-making process. A copy of the
2 notice of appeal procedures is included in your
3 hearing folder. These are the procedures that must
4 be followed if a final review, otherwise known as
5 an "appeal," is requested after a permit decision
6 has been made. Any person has the right to request
7 a final review or appeal of any permit decision
8 made by DHEC. This request must be in writing to
9 the DHEC's Clerk of Board within 15 days after the
10 notice of DHEC's decision has been mailed along
11 with a filing fee in the amount of \$100.

12 In consideration of this requirement, if you
13 indicated on the hearing sign-in sheet that you
14 wanted to receive any future information about the
15 permit for Roseburg Forest Products or if you have
16 submitted comments either before, during, or after
17 this hearing, you will receive notification of
18 DHEC's decision by standard U.S. mail or e-mail.
19 If you want to be notified by certified mail, you
20 should have indicated that on the sign-in sheet.

21 Finally, I would like to point out that there
22 is a public participation survey in your folder.
23 We are interested in knowing your thoughts and
24 suggestions on what you liked or didn't like about
25 tonight's hearing and how we can improve our public

1 participation efforts. Please take a moment to
2 complete this survey, place it in the box on the
3 sign-in tables as you leave outside this room. Any
4 comments or suggestions are appreciated and will be
5 kept anonymous.

6 On behalf of DHEC, I would again like to thank
7 everyone for your attendance this evening. The
8 time is now 7:14, and this hearing is officially
9 adjourned. No further formal recording of this
10 hearing will take place.

11 (Whereupon, at 7:14 p.m., the meeting of the
12 above-entitled matter was concluded.)

13 (*This transcript may contain quoted material.
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15 by the speaker.)

16 (**Certificate accompanies sealed original only.)
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