

Part 70 Operating Permit Amendment

Permit Amendment No.: 2621-103-0007-V-03-4 Effective Date: March 3, 2010

Facility Name: **Georgia-Pacific Consumer Products LP**
(Savannah River Mill)
393 Fort Howard Road
Rincon, Georgia 31326, Effingham County

Mailing Address: P.O. Box 828
Rincon, Georgia 31326-0828

Parent/Holding Company: GP Consumer Products Holdings LLC

Facility AIRS Number: 04-13-103-00007

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Modifications to the Bleaching Systems, including changes in bleaching chemicals, as described in Section 1.3 of this permit amendment.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2621-103-0007-V-03-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 18577 dated November 18, 2008; any other applications upon which this Permit Amendment or Permit No. 2621-103-0007-V-03-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2621-103-0007-V-03-0.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The proposed project will first involve changes to Bleaching System No. 3 to replace its use of “coated book” waste paper with “post consumer” waste paper. The project will require the modification or replacement of a number of pieces of process equipment, including a new bleach tower, one new dissolved air floatation devices, the upgrade of the disc thickener, a new primary bank of forward cleaners, two new washers, new flotation cells, and new fine screens. These improvements will allow Bleaching System No. 3 to increase its potential production rate of bleached pulp from the current permitted rate of 300 ADTBP (air-dried tons bleached pulp) per day to 364 ADTBP per day.

Detailed engineering for the proposed upgrades to Bleaching System Nos. 1, 2 and 4 has not yet been developed, but the changes for those systems will not result in production increases above the current permitted rates of 500, 500, and 550 ADTBP per day, respectively. The upgrades for these three bleaching systems will, however, allow the SRM (Savannah River Mill) to operate these systems closer to their potential production rates.

The project also involves the elimination of sodium hypochlorite as a bleaching chemical and the conversion of sodium hydrosulfite systems to sodium borohydride and sodium bisulfite. The changes will include the following:

- Conversion of the existing hydroboost storage tank to a bulk sodium borohydride storage tank;
- Conversion of the existing sodium hydrosulfite storage tank to a bulk sodium bisulfite storage tank;
- Conversion of the 4% hydrogen peroxide make down system to a 10% dilution system to include a new transfer pump, tank solution mixer, metering pump, and flow control;
- Conversion of the existing 50% sodium hydroxide make down system to produce a 7% solution stream to include a new in-line mixer, metering pumps, and flow controls; and
- Changing the chlor-alkali de-ionized water system to provide for both high and low pressure de-ionized water from the chemical feed dilution streams for hydrogen peroxide, sodium hydroxide, sodium bisulfite, and sodium borohydride.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.4 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PULP	Pulp Processing Area	40 CFR 52.21	3.3.20, 6.1.7, 6.2.9 through 6.2.11, and 6.2.20 through 6.2.22*	None	None
FP04 FP05 FP06 FP08	Bleaching System No. 1 Bleaching System No. 2 Bleaching System No. 3 Bleaching System No. 4	40 CFR 52.21	3.3.20, 6.1.7, 6.2.9 through 6.2.11, and 6.2.20, 6.2.22, and 6.2.23*	None	None
BT01	Sodium Bisulfite Tank	40 CFR 52.21	3.3.26 and 6.2.21 through 6.2.23*	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

3.3 Equipment Federal Rule Standards

- 3.3.20 The Permittee shall not discharge or cause the discharge into the atmosphere VOC emissions resulting from bleaching operations, chemical additive usage, and solvent usage in an amount equal to or exceeding 201.3 tons combined during any twelve consecutive month period from the Pulp Processing Area (Source Code PULP) and Bleaching System Nos. 1 through 4 (Source Codes FP04, FP05, FP06, and FP08).
[40 CFR 52.21]
- 3.3.26 The Permittee shall maintain and operate the Sodium Bisulfite Tank (Source Code BT01) in accordance with the plan described in Condition 6.2.21.
[40 CFR 52.21]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

xiii. Any consecutive 12-month period during which the total VOC emissions from the Pulp Processing Area (Source Code PULP) and Bleaching System Nos. 1-4 (Source Codes FP04, FP05, FP06, and FP08), calculated in accordance with Condition 6.2.10, equals or exceeds 201.3 tons.

[40 CFR 52.21]

6.2 Specific Record Keeping and Reporting Requirements

6.2.10 The Permittee shall use the monthly usage records from Conditions 6.2.9 and 6.2.20 to calculate total monthly VOC emissions for each equipment category specified in Conditions 3.3.16 and 3.3.20 in accordance with the following formula. The monthly VOC emissions totals shall be used to calculate emissions on a 12-month rolling basis. The emission records shall be kept available for inspection or submittal for five years from the date of record. The Permittee shall submit the monthly emission totals and 12-month rolling totals calculated during each reporting period with the quarterly report required by Condition 6.1.4.

[391-3-1-.03(2)(c), 40 CFR 70.6(a)(3)(i)(A), and 40 CFR 52.21]

$$M_{\text{paper}} = (A)(B)(C) \text{ and } M_{\text{pulp}} = (D)(E)(F) + (G)$$

Where:

- M_{paper} = total pounds of VOC emitted from the paper machines during the month;
- M_{pulp} = total pounds of VOC emitted from the pulp processing area and the bleaching systems during the month;
- A = gallons chemical additive and/or cleaning solvent used on paper machines during month;
- B = paper machine chemical additive and/or cleaning solvent density in lb/gal;
- C = weight fraction VOC in paper machine chemical additive and/or cleaning solvent;
- D = gallons of chemical additives and/or solvent used in pulp processing area or in bleaching systems during calendar month;
- E = density of chemical additives and/or solvent used in pulp processing area or in bleaching systems in lb/gal;

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- F = weight fraction VOC in chemical additives and/or solvent used in pulp processing area or in bleaching systems.
- G = pounds of VOC emitted from the pulp processing area and the bleaching systems during the month based on NCASI or other approved emission factors.

The Permittee shall notify the Division in writing if VOC emissions from Paper Machine Nos. 16 through 20 (Source Codes PM01 through PM05) exceed 17.2 tons during any calendar month or if combined VOC emissions from the Pulp Processing Area (Source Codes PULP) and Bleaching System Nos. 1 through 4 (Source Codes FP04, FP05, FP06, and FP08) exceed 16.7 tons during any calendar month from any of the equipment categories specified in Conditions 3.3.16 and 3.3.20. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limits in Conditions 3.3.16 and 3.3.20.

- 6.2.20 The Permittee shall maintain monthly pulp production records for the Pulp Processing Area (Source Code PULP) and Bleaching System Nos. 1-4 (Source Codes FP04, FP05, FP06, and FP08).
[391-3-1-.03(2)(c); 40 CFR 70.6(a)(3)(i)(A); 40 CFR 52.21]
- 6.2.21 The Permittee shall submit for Division approval, within 120 days of the issuance of this permit, a good operating practices plan for the maintenance and operation of the Sodium Bisulfite Tank (Source Code BT01). The plan shall describe the measures taken to minimize sulfur dioxide emissions from the tank.
[40 CFR 52.21]
- 6.2.22 The Permittee shall furnish the Division written notification as follows:
[40 CFR 60.7 and 40 CFR 63.9]
- a. A notification of the date construction is commenced for each of the bleaching system modifications within 15 days after such date.
- b. A notification of the date of completion for each of the bleaching system modifications postmarked within 15 days after such date.
- 6.2.23 The Permittee shall commence modification of the bleaching systems within 18 months of the date of issuance of this permit. Approval to construct shall become invalid if construction is not commenced by that date. For the purposes of this Permit, the definition of "commence" is given in 40 CFR 52.21(b)(9).
[40 CFR 52.21(r)]

PART 8.0 GENERAL PROVISIONS

8.27 Diesel-Fired Internal Combustion Engines

8.27.1 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) Federal Rule 40 CFR Part 60 Subpart A-"General Provisions" and Subpart III-"Standards for Stationary Compression Ignition Internal Combustion Engines," for diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005. Such requirements include but are not limited to:

[40 CFR 60.4205(b), 391-3-1-.02(8)(b)77]

- a. Equip all emergency generator engines with non-resettable hour meters
- b. Use only diesel fuel with a maximum sulfur content of 500 ppm (15 ppm after October 1, 2010) unless otherwise specified by the Division.