

# Part 70 Operating Permit Amendment

**Permit Amendment No.:** 2631-305-0001-V-03-3    **Effective Date:**

**Facility Name:**            **Rayonier Performance Fibers, LLC – Jesup Pulp Mill**

**Facility Address:**        4470 Savannah Highway  
Jesup, Georgia 31545, Wayne County

**Mailing Address:**        P.O. Box 2070  
Jesup, Georgia 31598

**Parent/Holding Company:**        Rayonier Performance Fibers, LLC

**Facility AIRS Number:**    04-13-305-00001

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:

Installation of staged air on No. 5 and No. 6 Recovery Furnaces (Source Codes RF01 and FR04), C-Mill conversion to dissolving pulp and production change of ADMT of pulp per any twelve consecutive months.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

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. 2631-305-00001-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. 20035 dated November 3, 2010; Revised June 29, 2011 any other applications upon which this Permit Amendment or Permit No. 2631-305-00001-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 **12** pages.

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Director  
Environmental Protection Division

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## **PART 1.0 FACILITY DESCRIPTION**

### **1.3 Process Description of Modification**

The Facility is requesting C-Mill conversion to dissolving pulp project, the color reduction project, and the project to authorize burning landfill/bio-gas in the Lime Kiln.

The facility is requesting to convert C-Mill from fluff pulp to dissolving pulp production with an annual facility-wide net pulp production limit of 539,000 ADMT and to increase the combined annual BLS burning rate in the No. 5 and No. 6 Recovery Furnaces from 1,549,425 to 1,612,947 short tons per year (4.1 percent increase). In order to reduce emissions, the facility will install staged air combustion systems on the No. 5 and No. 6 Recovery Furnaces. The facility plans to install more stages of combustion air on these furnaces to significantly reduce emissions.

The facility also plans to install additional brown stock washing capacity in A and C Mills to further capture BLS and reduce color discharge, and install equipment to allow the production of dissolving pulp in the C-Mill

A list of equipment changes as part of this modification is included in the attached revised Appendix A, in Permit Application #20035. Changes include the modification of the digester and blow tank systems on C-Mill, and the installation of a new hardwood chip pile (emissions associated with the new hardwood chip pile are approximated by calculating the increased emissions assuming an increased throughput to the existing chip piles). Both the existing recovery furnaces may require additional heat transfer surface and may need modifications to the existing precipitators. The facility may need to install a new set of evaporators, a crystallizer, and a causticizer/slaker to handle the additional BLS.

The increase in BLS burning rate is needed to account for the increased black liquor solids associate with dissolving pulp production and to reduce color and chloro-organics in the effluent to the wastewater. These solids are generated in the digesters and are removed by the brown stock washers.

The facility plans to install additional wash presses on A and C Mills, to remove more lignin in a form that can be burned in the recovery furnace, and to provide better washing for brown pulp, and thus achieve a better BLS capture.

The facility may also install an anaerobic digester system for the treatment of foul condensates from the kraft pulping process. This system would be used either as an alternative to or in combination with current MACT compliance options.

Finally, the facility requests to be able to burn either landfill gas or biogas generated by anaerobic digester system in the Lime Kiln to displace an equivalent amount of heat input from existing fuels. The anaerobic digester system will be equipped with a flare to burn the biogas for limited periods when the gas cannot be used in the lime kiln.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.2 Facility Wide Federal Rule Standards**

- 2.2.1 The Permittee shall comply with one of the following limits for total net pulp production at all times:  
[40 CFR 52.21, 40 CFR 52.21 Avoidance]

Current Production Limit

- a. The total net pulp production limit from the entire facility shall not exceed 616,656 air-dried metric tons of pulp per any twelve consecutive months.

After Completion of Staged Air No. 5 and No. 6 Recovery Furnace and C Mill Conversion

- b. Following the installation of staged air on No. 5 and No. 6 Recovery Furnaces and the equipment necessary to produce dissolving pulp on the C-Mill, the total net pulp production from the entire facility shall not exceed 539,000 air-dried metric tons of pulp per any twelve consecutive months.
- c. Delete

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**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

**3.1 Amended Emission Units**

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
RF01	No. 5 Recovery Furnace	40 CFR 52.21, 40 CFR 63 Subpart MM, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(gg), 40 CFR 52.21 Avoidance, 40 CFR 51.308 – Regional Haze SIP	3.3.3, 3.3.5, <b>3.3.12</b> to 3.3.14, 3.3.35, <b>3.3.36</b> , 3.4.8 to 3.4.11, 3.4.26, 4.2.1, 4.2.2, <b>4.2.11</b> , <b>4.2.12</b> , <b>4.2.14</b> , 4.2.18, 5.2.1, 5.2.3, 5.2.11, <b>6.1.7</b> , 6.2.9 to 6.2.12, <b>6.2.23</b> to <b>6.2.23</b> , 6.2.24, <b>6.2.25</b> , 6.2.26, 6.2.27, <b>6.2.32</b> , <b>6.2.33</b> , <b>6.2.34</b>	RFC1  SACS	No. 5 Recovery Furnace Precipitator Staged Air System – Install more stages of combustion air on the furnace
RF04	No. 6 Recovery Furnace	40 CFR 52.21, 40 CFR 63 Subpart MM 40 CFR 60 Subpart BB, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(gg), 40 CFR 52.21 Avoidance, 40 CFR 51.308 – Regional Haze SIP	3.3.1 to 3.3.3, 3.3.5, <b>3.3.12</b> to 3.3.14, <b>3.3.37</b> , 3.4.10, 3.4.11, 3.4.26, 4.2.1, 4.2.2, <b>4.2.12</b> , <b>4.2.13</b> , <b>4.2.14</b> , 4.2.19, 5.2.1, 5.2.3, 5.2.11, <b>6.1.7</b> , 6.2.9 to 6.2.12, <b>6.2.24</b> to <b>6.2.26</b> , 6.2.27, <b>6.2.32</b> , <b>6.2.33</b> , <b>6.2.34</b>	RFC3  SACS	No. 6 Recovery Furnace Precipitator Staged Air System - Install more stages of combustion air on the furnace
DG01 AD99, BD99, CD99	A Digester System, B Digester System, C Digester System (Including Foul Condensates and A, B, and C Turpentine System)	40 CFR 60 Subpart BB, (Batch Dig. 18, 20, 27, 28, 29, 30, 31, 32) 40 CFR 63 Subpart S, 391-3-1-.02(2)(gg)	3.3.1 to 3.3.4, 3.3.17, 3.3.21, 3.3.23, 3.3.25 to <b>3.3.33</b> , 3.3.32, 3.3.34, 3.4.19, 4.2.5, 5.2.6 to 5.2.8, <b>6.1.7</b> , 6.2.13 to 6.2.17, 6.2.21, 6.2.22	NCC3,  CA81, NCC1, EN99	Batch NCG Packed Tower Scrubber (Pre-Incineration) Lime Kiln, Incinerator, Wastewater Treatment Plant
NCC1	NCG Incinerator	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(gg), 391-3-1-.03(2)(c)	3.3.1 to 3.3.4, 3.3.17 to 3.3.21, 3.3.23, 3.3.25 to 3.3.32, 3.4.15 through 3.4.18, 4.2.5, 4.2.6, 5.2.1, 5.2.2, 5.2.6 to 5.2.8, <b>6.1.7</b> , 6.2.12 to <b>6.2.15</b> , 6.2.16, 6.2.17	NCC2	SO <sub>2</sub> Packed Tower Caustic Scrubber

**3.3 Equipment Federal Rule Standards**

No. 5 Recovery Furnace (Source Code: RF01) and No. 6 Recovery Furnace (Source Code: RF04)

3.3.12. The Permittee shall comply with one of the following limits for the combined black liquor solid (BLS) throughput for the No. 5 and No. 6 Recovery Furnaces at all times:  
[40 CFR 52.21, 40 CFR 52.21 Avoidance]

Current BLS throughput Limit

- a. The combined BLS throughput for the No. 5 and No. 6 Recovery Furnaces (Source Codes RF01 and RF04) shall not exceed 1,549,425 tons per any twelve consecutive months.

After Completion of Staged Air on No. 5 and No. 6 Recovery Furnace and C Mill Conversion

- b. Following the installation of staged air on No. 5 and No. 6 Recovery Furnaces (Source Codes RF01 and RF04) and the equipment necessary to produce dissolving pulp on the C-Mill, the combined BLS throughput for No. 5 and No. 6 Recovery Furnaces shall not exceed 1,612,947 tons per any twelve consecutive months.
- c. Delete

Wastewater Treatment Plant (Source Code: EN99)

3.3.33 The Permittee shall collect and treat all condensates regulated by 40 CFR 63 Subpart S. This treatment will include the option to treat all condensates entirely or in combination in the wastewater treatment plant or using a new anaerobic biological treatment system. Biogas produced in the anaerobic treatment system will be used as a fuel in the lime kiln and alternatively in a flare system when the gas cannot be treated in the lime kiln.

After Completion of Staged Air No. 5 and No. 6 Recovery Furnace and C Mill Conversion

- 3.3.36 Upon completion of Staged Air for No. 5 Recovery Furnace and C Mill Conversion projects, the Permittee shall not discharge or cause the discharge, into the atmosphere, from the No. 5 Recovery Furnace (Source Code: RF01), any gases which: [40 CFR 52.21 Avoidance Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]
- a. Contain nitrogen oxides in excess of 1.44 lb/ton BLS.
  - b. Contain particulate matter in excess of 0.31 lb/ton BLS.
  - c. Contain sulfur dioxides in excess of 20 ppm, corrected to 8 percent oxygen.
  - d. Contain carbon monoxide in excess of 300 ppm, corrected to 8 percent oxygen.
  - e. Contain total reduced sulfur (TRS) in excess of 3.2 ppm, corrected to 8 percent oxygen, or contain TRS in excess of 12.3 tons per any 12 consecutive month period.(The 3.2 ppm 30-day rolling average for TRS shall apply until such time the Permittee installs continuous mass emissions monitoring for TRS emissions on No, 5 Recovery Furnace to demonstrate compliance with the 12 consecutive month emissions limit.)
- 3.3.37 Upon completion of Staged Air for No. 6 Recovery Furnace and C Mill Conversion projects, the Permittee shall not discharge or cause the discharge, into the atmosphere, from the No. 5 Recovery Furnace (Source Code: RF01), any gases which: [40 CFR 52.21 Avoidance Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]
- a. Contain nitrogen oxides in excess of 1.51 lb/ton BLS.
  - b. Contain particulate matter in excess of 0.31 lb/ton BLS.
  - c. Contain sulfur dioxides in excess of 20 ppm, corrected to 8 percent oxygen.
  - d. Contain carbon monoxide in excess of 300 ppm, corrected to 8 percent oxygen.
  - e. Contain total reduced sulfur (TRS) in excess of 3.2 ppm, corrected to 8 percent oxygen, or contain TRS in excess of 20.6 tons per any 12 consecutive month period.(The 2 ppm 30-day rolling average for TRS shall apply until such time the Permittee installs continuous mass emissions monitoring for TRS emissions on No, 5 Recovery Furnace to demonstrate compliance with the 12 consecutive month emissions limit.)
- 3.3.38 Delete

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- 3.3.39 Upon completion of the C Mill Conversion projects, the Permittee shall not discharge or cause the discharge, into the atmosphere, from the Wastewater Treatment Plant (Source Code EN99), any gases, which contain volatile organic compounds in excess of 3.3 pounds per ODTUP. [40 CFR 52.21 Avoidance]
- 3.3.40 Delete

**PART 4.0 REQUIREMENTS FOR TESTING**

**4.2 Specific Testing Requirements**

4.2.7 [Reserved]

4.2.11 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of the Staged Air System on the No.5 Recovery Furnace and the C-Mill conversion project, the Permittee shall conduct performance tests for Nitrogen Oxide (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>) and Carbon Monoxide (CO) emissions on the No. 5 Recovery Furnace (Source Code: RF01) to demonstrate compliance with Condition 3.3.36. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

4.2.12 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of the installation of the Staged Air System on the No.5 Recovery Furnace, the Permittee shall conduct the performance tests: [40 CFR 52.21 Avoidance]

<b>Equipment</b>	<b>Pollutants</b>
No. 5 Recovery Furnace	Particulate Matter
No. 5 Recovery Furnace Dissolving Tank	Particulate Matter

4.2.13 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of the Staged Air System on the No.6 Recovery Furnace and the C-Mill conversion project, the Permittee shall conduct performance tests for Nitrogen Oxide (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>) and Carbon Monoxide (CO) emissions on the No. 6 Recovery Furnace (Source Code: RF04) to demonstrate compliance with Condition 3.3.37. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

4.2.14 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of the Stage Air System on the No.6 Recovery Furnace and the C-Mill conversion project, the Permittee shall conduct the following performance tests: [40 CFR 52.21 Avoidance]

<b>Equipment</b>	<b>Pollutants</b>
No. 6 Recovery Furnace	Particulate Matter
No. 6 East and West Recovery Furnace Dissolving Tanks	Particulate Matter

4.2.15 Delete

4.2.16 Delete

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**

**5.2 Specific Monitoring Requirements**

- 5.2.9 Until such time as the Division has approved surrogate parameters submitted by the Permittee for determining compliant operation of the Wastewater Treatment Plant – Aeration Basin #1A (E99) or the potential Anaerobic Treatment Plant, the Permittee shall continue its present practice of daily balance determination of treatment achieved. Please note that, compliance with Condition 5.2.9 satisfies Condition 4.2.5 and Condition 5.2.10. [40 CFR 63.453(j)(1)(ii), 40 CFR 63.447(b), 63.453(a) and Report submitted on September 2, 2004 pursuant to 63.447(h)]
- 5.2.10 The Permittee shall obtain daily inlet and outlet liquid grab samples from the Wastewater Treatment Plant – Aeration Basin #1A (E99) or, as applicable, the Anaerobic Treatment Plant to have HAP data available to perform quarterly percent reduction tests. The Permittee shall perform the following procedures with the liquid samples: [40 CFR 63.453(j)(2), 63.453(j)(3), 40 CFR 63.447(b), 63.453(a) and Report submitted on September 2, 2004 pursuant to 63.447(h)]
- a. Perform the percent reduction procedures specified in 40 CFR 63.457(l) within 45 days after the beginning of each quarter as specified in 40 CFR 63.453(j)(3)(ii).

**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)

xxi. Any 3-hour average recirculation flow rate to the No. 6 Recovery Furnace Dissolving Tank East Scrubber (RFC4) below 103 gpm.

xxiii. Any 3-hour average recirculation flow rate to the No. 6 Recovery Furnace Dissolving Tank West Scrubber (RFC5) below 104 gpm.

xxix. Any period of process time during which emissions from the Oxygen Delignification System are not controlled by the Incinerator (Source Code NCC1) or the No. 5 Recovery Furnace. [40 CFR 52.21 Avoidance]

xxxiii. Any 30-day rolling average period during which the average TRS concentration from the No. 5 Recovery Furnace is in excess of 3.2 ppm on a dry basis corrected to 8 percent oxygen (or any 12 consecutive month period during which TRS emissions are greater than 12.3 tons), after the installation of staged air on No. 5 Recovery Furnace and the C-Mill conversion project.

xxxiv. Any 30-day rolling average period during which the average TRS concentration from the No. 6 Recovery Furnace is in Excess of 3.2 ppm on a dry basis corrected to 8 percent oxygen (or any 12 consecutive month period during which TRS emissions are greater than 20.6 tons), after the installation of staged air on No. 5 Recovery Furnace and the C-Mill conversion project.

Wastewater Treatment Plant

xxxvi. Any 15-day rolling average during which the average VOC emissions from the Wastewater Treatment Plant exceeds 3.3 pounds per ODTUP, in accordance with Condition 6.2.34, after completion of the C-Mill Conversion project. [40 CFR 52.21 Avoidance]

## 6.2 Specific Record Keeping and Reporting Requirements

- 6.2.15 The Permittee shall maintain records sufficient to calculate and record the total amount of HAP as methanol removed by the steam stripper, Wastewater Treatment Plant – Aeration Basin #1A (E99) and the anaerobic treatment system to determine compliance with the 40 CFR 63 Subpart S (Condition No. 3.3.31) requirement for treatment of foul condensate. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

### Incinerator (Source Code NCC1) and No. 5 Recovery Furnace (RF01)

- 6.2.23 Within 60 days of the completion of the performance tests required by Condition 4.2.8, the Permittee shall submit to the Division for approval the CO emission rate correlations. The submission shall include all necessary supporting data. [40 CFR 52.21 Avoidance]
- 6.2.25 The Permittee shall implement the corrective action plan as developed in Condition 6.2.24 if any of the following monitoring exceedances occur:
- a. Any average of 10 consecutive 6-minute averages resulting in a measurement of greater than 20 percent opacity from the D Lime Kiln Precipitator (CAC1), the No. 5 Recovery Furnace Precipitator (RFC1), or the No. 6 Recovery Furnace Precipitator (RFC2);
  - b. Any 3-hour average pressure drop across the No. 5 Recovery Furnace Dissolving Tank Scrubber below 4.2 inches H<sub>2</sub>O;
  - c. Any 3-hour average recirculation flow rate to the No. 5 Recovery Furnace Dissolving Tank Scrubber below 333 gpm;
  - d. Any 3-hour average recirculation flow rate to either of the No. 6 Recovery Furnace Dissolving Tank Scrubbers (RFC4 or RFC5) below 103 gpm;
  - e. Any 3-hour average fan amperage on the fans for either of the No. 6 Recovery Furnace Dissolving Tank Scrubbers (RFC4 or RFC5) below 81.4 amps;
  - f. Any 3-hour average recirculation flow rate to either of the No. 6 Recovery Furnace Dissolving Tank Scrubbers (RFC4 or RFC5) below 104 gpm; or
  - g. Any 3-hour average fan amperage on the fans for either of the No. 6 Recovery Furnace Dissolving Tank Scrubbers (RFC4 or RFC5) below 92.5 amps.
- 6.2.32 The Permittee shall submit to the Division a notification when all the projects in the C-Mill Conversion project of Application #20035 are completed, including the installation of Stage Air on the No. 5 Recovery Furnace (Source Code: RF01) and No. 6 Recovery Furnace (Source Code RF04). This notification shall be postmarked within 15 days of the completion date.

- 6.2.33 The Permittee shall submit to the Division a notification when each of the following projects described in The C-Mill Conversion of this application are completed:
- a. The installation of Staged Air on No. 5 Recovery Furnace (Source RF01)
  - b. The installation of Stage Air on No. 6 Recovery Furnace (Source Code RF04)
  - c. The installation of Oxygen Delignification on the C-Mill
  - d. Deleted
  - e. The installation of the anaerobic digester system for treatment of foul condensates
  - f. All the projects described in C-Mill Conversion of this application are completed
  - g. Each notification shall be postmarked within 15 days of the above completion of the project.
- 6.2.34 Upon completion of C-Mill Conversion, No. 5 and No. 6 Recovery Furnace projects, the Permittee shall maintain daily records sufficient to calculate VOC emissions from the Wastewater Treatment Plant in pounds per ODTUP. For the purpose of demonstrating compliance with Condition 3.3.39, total HAPs as defined in 40 CFR 63.457(g) shall be used as the equivalent of total VOCs. The Permittee shall conduct the following to demonstrate compliance with the VOC limit in Condition 3.3.39:
- a. Conduct daily mass balance determination and 15-day rolling averages for methanol capture and destruction within the waste water treatment system
  - b. Conduct annual characterization for determination of total HAPs
  - c. Use EPA's Water9 model to develop emissions factors for total VOCs (HAPs) emissions.
  - d. Use model factors to calculate daily and 15-day rolling average of total VOCs (HAPs) emissions from the wastewater treatment system.

The Permittee shall submit a sample report to the Division within 30 days upon completion of C-Mill Conversion, No. 5 and No. 6 Recovery Furnace projects.

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.12 Revocation of Existing Permits and Amendments**

The following Air Quality Permits and Amendments are subsumed by this permit and are hereby revoked:

Air Quality Permit Number(s)	Dates of Original Permit Issuance or Amendment
2631-305-0001-V-03-2	August 30, 2011