

Facility Name: **Georgia-Pacific Chemicals LLC (Vienna Plant)**

City: Vienna

County: Dooly County

AIRS #: 04-13-093-00013

Application #: 17221

Date SIP Application Received: January 18, 2007; Updated April 9, 2007

Date Title V Application Received: January 18, 2007; Updated April 9, 2007

Permit No: 2821-093-0013-V-01-4

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>SSCP</b>	N/a	N/a
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2821-093-0013-V-01-0	September 18, 2003	X	
2821-093-0013-V-01-1	June 15, 2004	X	
2821-093-0013-V-01-2	August 31, 2005	X	
2821-093-0013-V-01-3	January 31, 2007	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2821-093-0013-V-01-0	Initial Title V permit.
2821-093-0013-V-01-1	Amendment for an increase in the formaldehyde production limit and the operation of a rental boiler.
2821-093-0013-V-01-2	Amendment for modifications to the resin kettles, an increase in the resin production limit, and the consolidation of the resin limits into a single production limit.
2821-093-0013-V-01-3	Amendment for a name change from Georgia-Pacific Resins to Georgia-Pacific Chemicals.

**B. Regulatory Status****1. PSD/NSR/RACT**

The source is non-major with respect to PSD/NSR. The potential emissions of each criteria pollutant is less than 100 tpy.

**2. Title V Major Source Status by Pollutant****Table 3: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM <sub>10</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes			✓
CO	Yes			✓
TRS	No			
H <sub>2</sub> S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes			✓

## II. Proposed Modification

### A. Description of Modification

The facility has proposed the following modifications:

- The installation of a 12.6 MMBtu/hr natural gas fired boiler designated as Source Code NGB1.
- The increase in the formaldehyde production limit from 130 million pounds to 140 million pounds per year (on a 50% solution basis) as a result of minor modifications to the formaldehyde process. The modifications include adding additional heat via steam to the methanol vaporizer, adding a vortex breaker in the bottom of the absorber, adding a site glass to the absorber, adding a NEAR IR to the absorber to monitor explosivity, adding a flange to the absorber (to allow for a future methanol recovery project), and replating the silver catalyst basket.
- The change in the minimum Thermal Oxidizer (Source Code OX-1) operating temperatures for 40 CFR 63 Subparts G, F, and OOO based on performance testing conducted in December 2005.
- The venting of Resin Storage Tank UF-13 to the Thermal Oxidizer so that it can receive Resin Kettle mischarges.

Please see the narrative for the initial Title V permit for a complete process description.

The facility address and mailing address have been updated on the amendment cover page. The physical location of the facility has not changed.

### B. Emissions Change

**New boiler:** The new boiler will be a source of PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions. The emissions have been calculated per the natural gas combustion emission factors found in the US EPA's AP-42 document. The potential emission increases due to the installation of the boiler are 0.42 tpy PM/PM<sub>10</sub>, 0.03 tpy SO<sub>2</sub>, 0.30 tpy VOC, 5.52 tpy NO<sub>x</sub>, and 4.64 tpy CO.

**Increased formaldehyde production:** The formaldehyde process is a source of VOC, HAP, and CO emissions. In December 2005, the facility conducted performance testing for the Formaldehyde and Resin Plants. During those tests the facility recorded the inlet loading to the thermal oxidizer of HAP and VOC from each process and the formaldehyde production rate. The facility has used this data to calculate uncontrolled emissions at the new production limit. The facility then applied the 98% control that is required under 40 CFR 63 Subpart G to determine potential emissions at the outlet of the thermal oxidizer. The CO emissions calculations are based on performance testing at another Georgia-Pacific formaldehyde plant where a factor was determined in terms of pounds CO per ton of 50% formaldehyde. Emissions from the change are minimal because the thermal oxidizer provides a high level of control. It should be noted that while the thermal oxidizer can fire natural gas at 35 MMBtu per hour, combustion can be sustained due to hydrogen present in the formaldehyde process tail gases. The facility will normally burn only a small amount of natural gas to maintain flame color. For this reason natural gas usage will not increase due to this modification. The potential emission increases due to the formaldehyde plant modifications are 1.16 tpy VOC, 0.59 tpy HAP, and 1.81 tpy CO.

**Change in minimum thermal oxidizer temperature:** There will be no emissions changes as a result of this modification. The limits in the current permit are based on testing completed in 2002. This modification will allow the facility to operate under the compliant temperatures for the formaldehyde and resins processes recorded during the December 2005 test.

Conversion of tank UF-13 to a mischarge tank: There will be no emissions changes as a result of this modification. Any emissions from the tank will be directed to the thermal oxidizer and these are the same emissions that would be sent to the oxidizer if the material had remained in the kettle.

**Table 4: Emissions Change Due to Modification**

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	<0.42	0.42
PM <sub>10</sub>	Yes	<0.42	0.42
SO <sub>2</sub>	Yes	<0.033	0.033
VOC	Yes	<1.46	1.46
NO <sub>x</sub>	Yes	<5.52	5.52
CO	Yes	<6.45	6.45
TRS	No	N/a	N/a
H <sub>2</sub> S	No	N/a	N/a
Individual HAP	Yes	<0.56	0.56
Total HAPs	Yes	<0.59	0.59

C. PSD/NSR Applicability

This modification is not subject to PSD/NSR. The facility is not classified as a major PSD/NSR source and the emissions from the modification do not make the facility a major source.

**III. Facility Wide Requirements**

- A. Emission and Operating Caps: Not Applicable.
- B. Applicable Rules and Regulations: Not Applicable.
- C. Compliance Status: Not Applicable.
- D. Operational Flexibility: Not Applicable.
- E. Permit Conditions: Not Applicable.

**IV. Regulated Equipment Requirements**

- A. Brief Process Description

Please see the initial Title V for a complete process description.

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

B. Equipment List for the Process

The entire equipment list has been included in the amendment for ease of reading.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
NBG1	Natural Gas Boiler 1	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d)	3.3.61, 3.4.6, 3.4.7, 5.2.2, 6.2.24, and 6.2.25*	None	None
<b>Formaldehyde Plant</b>					
ABS-1	Formaldehyde Absorber	40 CFR 63 Subpart F 40 CFR 63 Subpart G 391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	3.2.1, 3.3.1, 3.3.4, 3.3.5, 3.3.10, 3.3.57 through 3.3.59, 3.4.1, 4.2.6, 4.2.7, 4.2.10, 4.2.11, 5.2.1, 5.2.4, 5.2.8, 5.3.1, 5.3.11, 5.3.12, 6.1.7, 6.2.1, 6.2.6 through 6.2.13, 6.2.21, 6.2.23, and 6.2.26*	OX-1	Thermal Oxidizer
MeOH	Methanol Tank	40 CFR 63 Subpart F 40 CFR 63 Subpart G	3.3.1, 3.3.3, 3.3.6, 3.3.10, 3.3.57 through 3.3.59, 3.4.1, 3.4.2, 4.2.6, 4.2.7, 4.2.10, 4.2.11, 5.2.1, 5.2.3, 5.2.4, 5.2.8, 5.3.1, 5.3.11, 5.3.12, 6.1.7, 6.2.2, 6.2.3, 6.2.6 through 6.2.13, and 6.2.21*	OX-1	Thermal Oxidizer
B-1 B-2 INST	Formaldehyde Tank Formaldehyde Tank Off-Specification Formaldehyde Tank	40 CFR 63 Subpart F 40 CFR 63 Subpart G	3.3.1, 3.3.7, 3.3.58, 3.3.59, 3.4.1, 3.4.2, 5.2.1, 5.3.1, 6.2.2, and 6.2.8 through 6.2.13*	OX-1	Thermal Oxidizer
P-1 P-2	Formaldehyde Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G	3.3.1, 3.3.7, 3.3.58, 3.3.59, 3.4.1, 3.4.2, 5.2.1, 5.3.1, 6.2.2, and 6.2.8 through 6.2.13*	OX-1	Thermal Oxidizer
FUG (LDAR)	Pumps, valves, connectors, pressure relief devices, agitators, open-ended valves or lines, instrumentation systems, and sampling connection systems	40 CFR 63 Subpart F 40 CFR 63 Subpart H	3.3.1, 3.3.11 through 3.3.28, 3.3.58, 3.3.59, 4.2.1 through 4.2.3, 5.2.5, 5.3.1, 5.3.2 through 5.3.10, and 6.2.8 through 6.2.13*	None	None
N/A	Formaldehyde Transfer Operations	40 CFR 63 Subpart F 40 CFR 63 Subpart G	3.3.1, 3.3.8, 3.3.58, 3.3.59, 6.2.4, and 6.2.8 through 6.2.13*	None	None
N/A	Formaldehyde Plant Maintenance Wastewater	40 CFR 63 Subpart F	3.3.1, 3.3.9, 3.3.58, 3.3.59, 6.2.5, and 6.2.8 through 6.2.13*	None	None
CONV DIST VAP	Methanol Converter Distillation Unit Methanol Vaporizer	None	None*	None	None

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
<b>Liquid Resin Manufacturing</b>					
K-1 K-2 K-3	Resin Batch Process Kettles Sump and Vacuum with Vacuum Pumps VP-1, VP-2, and VP-3	40 CFR 63 Subpart OOO 391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.2 through 3.2.4, 3.3.29, 3.3.30, 3.3.55, 3.3.57 through 3.3.59, 3.4.1, 3.4.2, 4.2.6 through 4.2.9, 5.2.1, 5.2.7, 5.2.8, 5.3.1, 5.3.15, 6.1.7, 6.2.14, 6.2.16 through 6.2.21, and 6.2.23*	OX-1	Thermal Oxidizer
PFWT-1	Phenol / Formaldehyde Weigh Tank	40 CFR 63 Subpart OOO 391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.2 through 3.2.4, 3.3.29, 3.3.30, 3.3.55, 3.3.57 through 3.3.59, 3.4.1, 3.4.2, 4.2.6 through 4.2.9, 5.2.1, 5.2.7, 5.2.8, 5.3.1, 5.3.15, 6.1.7, 6.2.14, and 6.2.16 through 6.2.21*	OX-1	Thermal Oxidizer
UF-13	Resin Kettle Mischarge Tank	40 CFR 63 Subpart OOO 391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.2 through 3.2.4, 3.3.29, 3.3.30, 3.3.55, 3.3.57 through 3.3.59, 3.3.62, 3.4.1, 3.4.2, 4.2.6 through 4.2.9, 5.2.1, 5.2.7, 5.2.8, 5.3.1, 5.3.15, 6.1.7, 6.2.14, 6.2.16 through 6.2.21, and 6.2.27**	OX-1	Thermal Oxidizer
FUG (LDAR) including Tanks RM1-4, PD-1, PD-2, UFC-1, and MT-1	Valves, pumps, connectors, agitators, instrumentation systems, pressure relief devices, sampling connection systems, open-ended valves or lines	40 CFR 63 Subpart OOO (40 CFR 63 Subpart UU)	3.3.29, 3.3.31 through 3.3.54, 3.3.58, 3.3.59, 4.2.4, 4.2.5, 5.2.6, 5.3.1, 5.3.13, 5.3.14, and 6.1.7*	None	None
UH-1 BS-1	Urea Storage and Feed System Salt Storage and Feed System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.3.1, and 6.1.7*	SCRUB-2	Shower Scrubber
SI-1 SI-2 RMMT	Extender Storage and Feed System Filler Storage and Feed System Resi-Mix Mix Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.3, 3.4.4, 5.2.2, 5.2.9, 5.3.1, and 6.1.7*	BH-1	Baghouse
N/A	Resin Loading Racks	None	None	None	None
<b>Other</b>					
N/A	Roadways and Fugitive Dust	391-3-1-.02(2)(n)	3.4.5*	None	None

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

†Table 3.1.4 replaces Tables 3.1, 3.1.1, and 3.1.2 found in Air Quality Permit Nos. 2821-093-0013-V-01-0, 2821-093-0013-V-01-1, and 2821-093-0013-V-01-2, respectively. Air Quality Permit No. 2821-093-0013-V-01-03 does not include an emission unit table.

C. Equipment & Rule Applicability

*Natural Gas Boiler 1*

The boiler has a capacity of 12.6 MMBtu/hr and will fire only natural gas. The unit was constructed in 2004. The boiler is subject to the following rules and regulations:

40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Georgia Rule - 391-3-1-.02(2)(b) – Visible Emissions [Subsumed by Rule (d)]

Georgia Rule - 391-3-1-.02(2)(d) – Fuel-burning Equipment (Opacity and Particulate Matter)

Georgia Rule - 391-3-1-.02(2)(g) – Sulfur Dioxide (This standard has not been included in Section 3.4 of the permit because natural gas inherently complies with the sulfur limit.)

The boiler is not subject to 40 CFR 63 Subpart DDDDD (Boiler MACT). The unit is considered a new, small, gas burning unit as described in 40 CFR 63.7506(c)(4).

*Resin Plant*

Resin Batch Process Kettles with Vacuum Pumps (Source Code K-1 through K-3), Weigh Tank (Source Code PFWT-1), and Resin Kettle Mischarge Tank (Source Code UF-13) are subject to the following rules and regulations. There are no rule changes due to the proposed modification. The mischarge tank has been added to the appropriate section of the equipment list. It is no longer considered an insignificant source.

40 CFR Part 63 Subpart OOO – National Emission Standards for Organic Hazardous Air Pollutants: Manufacture of Amino/Phenolic Resins (UF and PF Resins)

Georgia Rule 391-3-1-.02(2)(a)(1) – General Provisions

Georgia Rule - 391-3-1-.02(2)(b) – Visible Emissions

Georgia Rule - 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes

Georgia Rule - 391-3-1-.02(2)(g) – Sulfur Dioxide (This standard is for fuel burned in the Thermal Oxidizer. Since the unit only burns natural gas, the standard has not been included in Section 3.4 of the permit.)

The UF-13 tank is also subject to 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

E. Operational Flexibility

Not Applicable.

F. Permit Conditions

Condition 3.2.1 has been modified. The formaldehyde production limit has been increased from 130 MM pounds per year to 140 MM pounds per year on a 50% solution basis. The limit is enforced under the provisions of Georgia Rule 391-3-1-.02(2)(a) and was placed in the permit in response to the facility's failure to obtain proper permits for the modification of the resin plant in the 1980's. The limit also ensures that any production increases are evaluated by the Division to determine if additional performance testing is necessary.

Conditions 3.3.2, 3.3.3.a , and 3.3.30 have been modified to allow the facility to operate under the thermal oxidizer temperatures that represented compliance with the most recent performance tests for the HON (formaldehyde plant) and the Resin MACT (resin plant). In the 2002 tests, the facility recorded a thermal oxidizer temperature of 903 degrees Celsius for the formaldehyde plant and resin plant operating simultaneously and 941 degrees Celsius for the resin plant operating alone. It was determined by the EPD that the facility must use the minimum temperature of 941 degrees Celsius because the Resin MACT, as written, does not allow for two different temperature set points within the daily average when the compliant temperature for the resin plant is higher than the temperature for the plants operating simultaneously (please see pages 25 and 26 of the narrative for the initial Title V for further explanation).

In the 2005 testing, the facility showed compliance with the resin plant alone at 671 degrees Celsius, the formaldehyde plant alone at 829 degrees Celsius, and with the plants operating simultaneously at 817 degrees Celsius. Condition 3.3.2 has been modified to change the minimum thermal oxidizer temperature for the formaldehyde process vent to 829 degrees Celsius. Condition 3.3.3.a has been modified to change the minimum thermal oxidizer temperature for the methanol storage tank to 829 degrees Celsius when the formaldehyde plant is operating and to 671 degrees Celsius when the formaldehyde plant is not operating to meet the 95% control requirement (the tests indicated >99% control for methanol at 671 degrees and >99.9% control at 829 degrees). Condition 3.3.30 has been modified to require a temperature of 829 degrees if the formaldehyde plant and resin plant are operated simultaneously for a full day. If the formaldehyde plant is down for a full day (usually for planned maintenance) then the facility is permitted to use the lower temperature of 671 degrees to demonstrate Resin MACT compliance. This modification will allow the facility to use less natural gas when there is a formaldehyde plant outage. This represents a cost savings for the plant, conserves fuel, and eliminates combustion pollutants that would have otherwise been emitted.

Condition 3.3.61 has been added to the permit. The condition requires the facility to comply with the general provisions in 40 CFR 60 Subpart A and the provisions of 40 CFR 60 Subpart Dc for the operation of the new boiler. The facility will only be subject to record keeping requirements because the boiler burns no fuels other than natural gas.

Condition 3.3.62 has been added to the permit. The condition requires the facility to comply with the provisions of 40 CFR 60 Subpart Kb for the operation of Kettle Mischarge Tank UF-13.

Conditions 3.4.6 and 3.4.7 have been added to the permit. The conditions describe the particulate matter and opacity provisions that the new boiler is subject to under Georgia Rule (d).

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

**A. Individual Equipment:**

Formaldehyde Production: Conditions 4.2.10 and 4.2.11 have been added to the permit to require the facility to conduct performance testing for the formaldehyde plant.

Natural Gas Boiler: No performance testing is required for the new boiler.

**B. Equipment Groups (all subject to the same test requirements): Not Applicable.**

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

Formaldehyde Production: The existing permit conditions already include all of the monitoring requirements for determining compliance with the formaldehyde plant provisions. No additional monitoring requirements are necessary.

Natural Gas Boiler: Condition 5.2.2.c has been added to the permit and requires the facility to monitor the amount of natural gas fired in the boiler in order to comply with the record keeping provisions of 40 CFR 60 Subpart Dc. No direct monitoring is required for particulate matter or opacity provision because the unit only burns natural gas. It is highly unlikely that a natural gas boiler would violate the provisions of Georgia Rule (d).

B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable.

**VII. Other Record Keeping and Reporting Requirements**

Condition 6.1.7.b(i) has been modified to reflect the new formaldehyde process production limit.

Conditions 6.1.7.c(iii) and 6.1.7.c(vi) have been modified to refer back to the temperature found in Conditions 3.3.2 and 3.3.30 rather than indicating a specific value. This will require fewer conditions to be modified for future temperature value changes.

Condition 6.2.7 has been modified to correct typographical errors in paragraphs (c) and (d). The permit should have referred to Conditions 3.3.2 and 3.3.3 where it referred to Condition 3.3.30. This correction is important due to the adjustments in the HON and Resin MACT thermal oxidizer temperatures.

Conditions 6.2.24 and 6.2.25 have been added to the permit for the operation of the new boiler. The record keeping and reporting provisions are required under 40 CFR 60 Subpart Dc and ensure that the boiler is not subject to any limits other than those listed in the permit.

Condition 6.2.26 has been added to the permit. The condition requires the facility to notify the Division of the startup of the modified formaldehyde plant.

Condition 6.2.27 has been added to the permit. The condition requires the facility to maintain general records for Kettle Mischarge Tank UF-13 in accordance with the provisions of 40 CFR 60 Subpart Kb.

**VIII. Specific Requirements**

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

The insignificant activities table in Attachment B has been updated to remove Tank UF-13, which has been moved to the emission unit table.

- D. Temporary Sources  
Not Applicable.
- E. Short-Term Activities  
Not Applicable.
- F. Compliance Schedule/Progress Reports  
Not Applicable.
- G. Emissions Trading  
Not Applicable.
- H. Acid Rain Requirements  
Not Applicable.
- I. Prevention of Accidental Releases  
Not Applicable.
- J. Stratospheric Ozone Protection Requirements  
Not Applicable.
- K. Pollution Prevention  
Not Applicable.
- L. Specific Conditions  
Not Applicable.

**Addendum to Narrative**

The 30-day public review started on June 28, 2007 and ended on July 30, 2007. Comments were received by the Division. Facility comments were received from Karl Nelson, Plant Manager, on July 16, 2007.

**Facility Comments**

**Comment 1**

Page 4, Condition 3.3.2 – The last sentence should be deleted because “operating day” is not references in the permit condition eliminating the necessity to define it here as it is defined several other times in the conditions containing this term.

**EPD Response:** The Division agrees that the term “operating day” is not used in the reference permit condition. The Division has corrected this by adding the phrase “during each ‘operating day’ ” at the end of the first sentence of Condition 3.3.2. The definition of an operating day should not be deleted from the condition.

**Comment 2**

Page 7, Condition 4.2.11 – The term “operating day” is used in this condition but not defined. It should be either defined again here or reference another permit condition where the term is defined.

**EPD Response:** The Division agrees with the comment. The definition of “operating day” has been added to the condition.

**Comment 3**

Page 8, Condition 5.2.2 – This condition requires the facility to install monitoring devices for the natural gas boiler but there is no timeframe for doing so. The condition should be amended to add, “within 60 days after permit issuance” or something to that effect so that the facility has sufficient time to install these monitoring devices and is not put in a situation of noncompliance on the date the permit is issued.

**EPD Response:** It is not necessary to specify a time period because the boiler must be in compliance with all provisions of 40 CFR 60 Subpart Dc upon startup. No changes have been made as a result of this comment.

**Comment 4**

Page 9, Condition 6.1.7.c(iii) – Third line of the condition is the phrase “temperature applicable temperature” – seems this should state merely “applicable temperature” so the first “temperature” should be deleted.

**EPD Response:** The Division agrees with the comment. The extraneous language has been deleted.

**Comment 5**

Page 10, Condition 6.2.7.a – The second sentence states “Such records shall be maintained in a manner such that the records are up-to-date and readily accessible for inspection for at least 5 years from the date of each performance test required by Condition 4.2.1.a and b to establish the temperature range that indicates proper operation of the Thermal Oxidizer by recording and reporting the average firebox temperature over the full period of the performance test.” This sentence is not only confusing, but it also seems to require that we keep continuous records of the firebox temperature for 5 years after the performance test. This doesn’t seem right because we typically must keep all records for 5 years and this phrase as written seems to suggest that some of the records will be kept for less than 5 years if they are generated after the performance test. Therefore, to be consistent with the requirement to keep all records for a minimum of 5 years, all the words in this sentence after “5 years” should be deleted.

**EPD Response:** The Division agrees that the phrase “from the date of each performance test required by Condition 4.2.1.a and b to establish the temperature range that indicates proper operation of the Thermal Oxidizer by recording and reporting the average firebox temperature over the full period of the performance test” should not have been included in the condition. It has been deleted as requested.

**Comment 6**

Page 11, Condition 6.2.7.d – Second line of the condition should state “operating day is less than . . .”

**EPD Response:** The Division agrees with the comment. The change has been made.

**Comment 7**

Page 11, Condition 6.2.7.d and e – These subparts create a very confusing recordkeeping scenario and appear to be contradicting one another. Subpart d states that if the average temperature is less than the compliance temperature, then data under paragraph e shall be recorded and kept for 5 years. However, subpart e states that if temperatures are at or above the compliance temperature than the permittee may record that all values were at or above the compliance temperature and retain this for 3 years (and also retain the information required by paragraph c). So, it appears, subpart d applies to temperatures below the compliance temperature but requires the information in subparts d and e to be retained even through subpart e addresses situations when the temperatures are at or above the compliance temperature. Please revise these subparts to clearly indicate when and what type of records are required when temperatures are above or below the compliance temperatures.

**EPD Response:** The Division believes the confusion is due to a typographical error in paragraph (d) of the condition. The paragraph should read “. . . retain the data recorded that operating day under paragraph (a) of this condition for 5 years” rather than “. . . retain the data recorded that operating day under paragraph (e) of this condition for 5 years.” The paragraph reference has been corrected. The remaining language in these paragraphs is taken directly from 40 CFR 63 Subpart G.

**Comment 8**

Page 12, Condition 6.2.26 – This condition states that the facility shall furnish EPD with written notification after startup and then defines “startup” to mean “the setting in operation of a source for its intended purpose.” This definition should include a “debugging period.”

**EPD Response:** Condition 6.2.26 has been modified to read as follows:

- 6.2.26 The Permittee shall furnish the Division written notification as follows. For the purpose of this Permit, “startup” shall mean the setting in operation of a source for its intended purpose.
- a. The actual date of the initial startup of the modified Formaldehyde Plant, within 15 days after such date.
  - b. The actual date of the commencement of stable operation of the modified Formaldehyde Plant, within 15 days after such date.
  - bc. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the application for the Formaldehyde Plant.

**EPD Changes**

Condition 4.2.10 – The first sentence of the condition has been corrected to read as follows:

Within 60 days of achieving maximum production capacity for the Formaldehyde Plant, but not later than 180 days after ~~achieving maximum production capacity~~ startup of the modified Formaldehyde Plant, the Permittee shall conduct performance tests for the operation of Thermal Oxidizer OX-1.