Part 70 Operating Permit Amendment

Permit Amendment No.: **2631-099-0001-V-01-2** **Effective Date:** Jan 29, 2002

Facility Name: **Georgia-Pacific Corporation, Cedar Springs Operation**
Highway 273 West, P.O. Box 44
Cedar Springs, Georgia 31732, Early County

Mailing Address: Highway 273 West, P.O. Box 44
Cedar Springs, Georgia 31732

Parent/Holding Company: Georgia-Pacific Corporation

Facility AIRS Number: 04-13-099-00001

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 or in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

To increase NOx limit on the NCG/SOG incinerator and to update monitoring permit conditions based on performance tests and alternative monitoring.

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 or in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2631-099-0001-V-01-0. 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. 13111 dated June 22, 2001 and; any other applications upon which this Permit Amendment or Permit No. 2631-099-0001-V-01-0 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 **13**, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2631-099-0001-V-01-0

Director
Environmental Protection Division

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

3.3 Equipment Federal Rule Standards

3.3.17 The Permittee shall not discharge or cause the discharge into the atmosphere from the incinerator/scrubber system any gases which:

a. Contain nitrogen oxide emissions in excess of 50 pounds per hour; [40 CFR 52.21 Avoidance]

b. Contain sulfur dioxide emissions in excess of 9.0 pounds per hour; [40 CFR 52.21 Avoidance]

c. Contain PM10 emissions in excess of 9.0 pounds per hour; [40 CFR 52.21 Avoidance]

d. Contain volatile organic compound emissions in excess of 9.0 pounds per hour. [40 CFR 52.21 Avoidance]

3.3.24 Deleted

3.4 Equipment SIP Rule Standards

3.4.12 Deleted

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

a. Method 1 for sample point location,

b. Method 2 for the determination of flow rate,

c. Method 3 for the determination of stack gas molecular weight,

d. Method 4 for the determination of stack moisture,

e. Method 5 for the determination of particulate matter emissions,

f. Method 6 for the determination of the concentration of sulfur dioxide,

g. Method 7 for the determination of the concentration of nitrogen oxides,

h. Method 9 and the Procedures of Section 1.3 for the determination of the opacity of visual emissions,

i. Method 10 for the determination of carbon monoxide emissions,

j. Method 16 for the determination of the concentration of total reduced sulfur,

k. Method 17 for the determination of particulate matter emissions from recovery boilers if a constant value of 0.004 gr/dscf is added to the results of Method 17 and the stack temperature is no greater than 400 °F.

l. Method 19 for the determination of nitrogen oxides emission rate,

m. Method 21 for the determination of volatile organic compound leaks,

n. Method 305 or NCASI Method DI/MEOH-94.02, Methanol in Process Liquids GC/FID (Gas Chromatography/Flame Ionization) for the determination of methanol content,

o. Method 101A or Method 105 for the determination of mercury emissions,

p. Method 308 for the determination of methanol emissions from stationary sources,

q. The procedures described in U.S. Environmental Protection Agency document EPA-600/2-80-018 (Samplers and Sampling Procedures for Hazardous Waste Streams) shall be used to obtain the sample of used oil,

r. Method 6010B, contained in the SW-846 methods manual of U.S. Environmental Protection Agency's Office of Solid Waste, shall be used to determine concentrations of arsenic, cadmium, chromium and lead,

s. ASTM Method D808 shall be used to determine total halogens,

t. ASTM Method D 93 shall be used to determine flashpoint,

u. SW-846 Method 8082 shall be used to determine Polychlorinatedbiphenyls (PCB).

For the determination of volatile organic compound emission rates from the NCG incinerator, Methods 308, 16, and 18 shall be used.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.
[391-3-1-.02(3)(a)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Pressure drop and scrubbant flow rate for Lime Kiln scrubbers.
[40 CFR 52.21]

b. Pressure drop and scrubbant flow rate for Smelt Dissolving Tank scrubbers 1, 2 and 3.
[40 CFR 52.21]

c. Pressure drop and scrubbant flow rate for Power Boilers 1 and 2 scrubbers.
[391-3-1-.02(2)(d)]

d. Temperature at the back end of the first pass of the incinerator (Source Code R425).
[40 CFR 63.453(b)]

e. Process wastewater feed rate, steam feed rate and process wastewater column feed temperature for the steam stripper (Source Code R424).
[40 CFR 63.453(g)]

f. Scrubbant flow rate and pH of the incinerator scrubber.
[40 CFR 52.21 Avoidance]

5.2.7 The Permittee shall visually inspect each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d) at a minimum of once per each month (during the first week of operation each month) and shall comply with the inspection requirements specified in 40 CFR 63.964, except for the closed-vent system and control device inspection and monitoring requirements specified in 40 CFR 63.964(a)(2). The closed-vent system and control device shall meet the requirements specified in 40 CFR 63.453(a) through (k).
[40 CFR 63.453(l)]

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)]

a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

Lime Kilns 1 & 2

i. Any 24-hour period during which the average TRS concentration measured and recorded in accordance with 5.2.1(a) are in excess of 40 ppm on a dry basis corrected to 10 percent oxygen.
[391-3-1-.02(2)(gg)1(iv)]

Recovery Boilers 1 & 2

ii. Any 12-hour period during which the average TRS concentration measured and recorded in accordance with 5.2.1(b) are in excess of 5 ppm on a dry basis corrected to 8 percent oxygen.
[40 CFR 52.21]

iii. Any 3-hour period during which the average SO2 concentration measured and recorded in accordance with 5.2.1(b) are in excess of 300 ppm on a dry basis corrected to 8 percent oxygen.
[40 CFR 52.21]

iv. Any six minute period during which the opacity from Recovery Boiler 1 or 2 measured and recorded in accordance with Condition 5.2.1(b) are equal to or in excess of 20 percent.
[40 CFR 52.21(j)(3)]

Recovery Boiler 3

v. Any six minute period during which the opacity from Recovery Boiler 3 measured and recorded in accordance with Condition 5.2.1(c) is equal to or in excess of 40 percent.
[391-3-1-.02(2)(b)1]

vi. Any 24-hour period during which the average emissions of TRS from the recovery furnace measured and recorded in accordance with Condition 5.2.1(c) are in excess of 20 ppm on a dry basis corrected to 8 percent oxygen.
[391-3-1-.02(2)(gg)1(i)]

Stripper, Incinerator/ Scrubber System (Cluster Rule)

vii. Prior to the completion of the performance test required by 4.2.5, any 3-hour average during which the temperature in the incinerator (Source Code R425) measured in accordance with 5.2.2(e), is below 1200 F.
[391-3-1-.02(2)(gg) and 40 CFR 60 Subpart BB]

viii. Any 3-hour average during which the temperature in the incinerator (Source Code R425) measured in accordance with 5.2.2(d), is below 1244 °F.
[40 CFR 63.443(d)]

ix. Any 3-hour average during which the effective steam to condensate feed ratio is less than 0.078, or the process wastewater column feed temperature for the steam stripper is less than 185.2 °F.
[40 CFR 63.453(g)]

x. Any time of process operation during which the scrubber is not operated when operating the incinerator (Source Code R425).
[391-3-1-.02(2)(a)(10)]

Cluster Rule

xi. Periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of § 63.443(c) and (d) (Conditions 3.3.23 and 3.3.24) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

(A) 1% for control devices used to reduce the total HAP emissions from the LVHC system;

(B) 4% for control devices used to reduce the total HAP from the HVLC system; and

(C) 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC system.
[40 CFR 63.443(e)]

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)

Recovery Boilers 1 & 2

i. Any time of process operation during which the fuel burned in Recovery Boilers 1 & 2 does not meet the definition of "very low sulfur oil," as defined in NSPS Subpart Db.
[40 CFR Subpart Db]

ii. Any time of process operation during which the annual capacity factor for oil fired in Recovery Boiler 1 or 2 is greater than 10% for each recovery boiler. The annual capacity factor is to be recorded at the beginning of each month.
[40 CFR Subpart Db Avoidance for NOx limits]

Power Boilers 1 & 2

iii. Any 3-hour period or any day of process operation during which the average amount of tire derived fuel (TDF) burned exceeds 5000 lb/hr or 60 tons/day, respectively in Power Boiler 1 or 2.
[40 CFR 52.21 Avoidance]

Package Boilers

iv. Any 12-month rolling period during which the package boilers (Source Codes PK1, PK2, PK3) are operated more than 1560 hours per year at the maximum design rates.
[40 CFR 52.21 Avoidance]

v. Any 12-month rolling period during which the package boilers consume more than 471.5 x 106 SCF per year of natural gas.
[40 CFR 52.21 and 40 CFR 52.21 Avoidance]

vi. Any time during which the package boilers are in operation when one of the other boilers of equal or larger capacity is not shutdown.
[40 CFR 52.21 Avoidance]

Fuel

vii. Any time of process operation during which the used oil burned does not meet the specifications defined in 3.3.15.
[40 CFR 266.40(e)]

viii. Any 12-month rolling period of process operation during which the amount of used oil burned is greater than 1,400,000 gallons during any 12 consecutive months in Recovery Boiler 3, Power Boilers 1 and 2 and Lime Kilns 1 and 2.
[40 CFR 52.21 Avoidance]

ix. Any time of process operation during which the fuel oil burned in Lime Kilns 1 and 2, Power Boilers 1 and 2, and Recovery Boiler 3 does not meet the limits defined in 3.4.4, 3.4.11, 3.4.12, and 3.4.21.
[391-3-1-.02(2)(g)]

Cluster Rule

x. Any 15-day rolling period of process operation during which the pulping process condensates from equipment systems listed in Condition 3.3.25 that in total contain less than a total HAP mass of 7.2 lbs per ton of ODP.
[40 CFR 63.446(c) (3)]

Treatment

xi. Any 15-day rolling period of process operation during which the treatment of the pulping process condensates removes less than 6.6 pounds of methanol per ton ODP.
[40 CFR 63.446(e)]

Incinerator/ Scrubber System (Cluster Rule)

xii. Any time (excluding periods of startup, shutdown or malfunction) of process operation during which the total HAP emissions from the equipment listed in 3.3.22 are not controlled after April 17, 2006.
[40 CFR 63.443(a)(1)(i) through (v) and 63.443(b)(1)]

c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

Lime Kilns

i. Any three consecutive one hour periods during which the average pressure drop or scrubbant flow rate for either lime kiln scrubber falls below the following values:

(A) No. 1 Lime Kiln Scrubber: 19.4 inches of water or 560 gpm.

(B) No. 2 Lime Kiln Scrubber: 19.9 inches of water or 560 gpm.

ii. Any two consecutive readings during which the pressure drop or scrubbant flow rate for the lime handling system scrubber falls below the following values: 12.6 inches of water or 54 gpm.

Recovery Boiler 1

iii. Any three consecutive readings during which the total power for the electrostatic precipitator falls below 75% of the value determined in accordance with 4.2.2.

iv. Any black liquor nitrogen content analysis which is 50% greater than the parameter established in accordance with Condition 4.2.8.

Recovery Boiler 2

v. Any three consecutive readings during which the total power for the electrostatic precipitator falls below 75% of the value determined in accordance with 4.2.2.

vi. Any black liquor nitrogen content analysis which is 50% greater than the parameter established in accordance with Condition 4.2.8.

Recovery Boiler 3

vii. Any three consecutive readings during which the total power for the electrostatic precipitator falls below 75% of the value determined in accordance with 4.2.2.

Smelt Tanks

viii. Any three consecutive one hour periods during which the average pressure drop or scrubbant flow rate for Smelt Dissolving Tank Scrubber 1, 2 or 3 falls below the following values:

(A) No. 1 Smelt Tank Scrubber: 2.4 inches of water or 50 gpm.

(B) No. 2 Smelt Tank Scrubber: 1.6 inches of water or 54 gpm.

(C) No. 3 Smelt Tank Scrubber: 2.5 inches of water or 127 gpm.

Power Boilers

ix. Any three consecutive one hour periods during which the average pressure drop or scrubbant flow rate for either power boiler scrubber falls below the following values:

(A) No. 1 Power Boiler Scrubber: 4.5 inches of water or 1575 gpm.

(B) No. 2 Power Boiler Scrubber: 4.5 inches of water or 1710 gpm.

Incinerator/ Scrubber System (Cluster Rule)

x. Any three hour period of process operation during which the minimum pH or minimum flow rate for the scrubber recycle flow associated with the incinerator falls below the following parameters:
[391-3-1-.02(2)(a)(10)]

(A) Scrubber pH: 8.2

(B) Scrubber recycle flow rate: 494 gpm.

xi. Any 15-day period of process operation during which the average condensate collection falls below 7.2 lb/hr as determined according to the procedures specified in § 63.453(n).

d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

i. The oil analyses, as specified in Conditions 5.2.8, 6.2.7 and 6.2.9, for residual or used oil fired during the quarter and a statement signed by a responsible official that the analyses submitted represent all of the residual or used oil combusted during the quarter.

ii. The amount of used oil received during each calendar month shall be submitted with the fourth quarter report.

iii. The annual capacity for fuel oil for Recovery Boilers 1 and 2 for the past twelve consecutive months. The annual capacity shall be recorded at the beginning of each month and determined in accordance with Condition 3.3.3.

iv. A statement signed by a responsible official that the records of fuel supplier certifications maintained by the facility represent all of the fuel oil combusted during the quarter.

v. A list of all the current operational parameters established in accordance with Condition 4.2.2.

vi. The black liquor analysis, as specified in Condition 5.2.4, and a statement signed by a responsible official that the black liquor burned in Recovery Boilers 1 and 2 is free of nitrogen based additives.

vii. Any 5-minute period of process operation during which any portion of the total HAP emissions from each LVHC system in the kraft pulp mill are not controlled.

6.2 Specific Record Keeping and Reporting Requirements

Fuel

6.2.10 Deleted

TRS

6.2.14 Deleted

Attachments

None