

Facility Name: **Georgia Pacific Corporation, Cedar Springs Operation**
 City: Cedar Springs
 County: Early
 AIRS #: 04-13-099-00001

Application #: 13111
 Date Application Received: June 29, 2001
 Date of Draft Permit:
 Permit No: 2631-099-0001-V-01-2

Program	Review Engineers	Review Managers
SSPP/ASU	Michele Lamb	Heather Abrams
SSCP/ASU		Lou Musgrove
ISMP	Sid Stephens	Richard Taylor
Toxics	Sherry Waldron	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached Part 70 Operating Permit Amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Georgia Pacific Corporation, Cedar Springs Operation and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

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 participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Georgia Pacific Corporation, Cedar Springs Operation
2. Parent/Holding Company Name: Georgia Pacific Corporation
3. Previous and/or Other Name(s): Great Southern Paper
4. Facility Location: Highway 273 West
Cedar Springs, Georgia 31732
5. Attainment or Non-attainment Area Location

The facility is located in an attainment area.

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area.

B. Site Determination

The facility has indicated no other facilities which could possibly be contiguous or adjacent under common control.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2631-099-0001-V-01-0	March 9, 2001		✓
2631-099-0001-V-01-1	April 19, 2001		✓

Table 2: Comments on Specific Permits

Permit Number	Comments
Not Applicable	

D. Process Description

1. SIC Codes(s)

2631

2. Description of Product(s)

Manufacture of unbleached kraft linerboard and unbleached corrugating medium.

3. Description of Proposed Modification

The facility wants to modify the existing Nitrogen Oxide (NOx) permit limit on the NCG/SOG incinerator. In 1998, GP submitted a Pollution Control Project (PCP) application to install and operate equipment necessary to meet the requirements of the Cluster Rule. The information in that application was the best available information from current sources and equipment suppliers' estimates. The equipment was designed to allow Cluster Rule requirements to be met with some margin of safety and to allow future expansion of the treatment system so GP could use the same equipment to meet the Cluster Rule's eight-year requirements as well. The PCP was approved and the equipment was installed and started up in February 2001.

The permit required stack testing to be done on the new equipment within sixty days of startup. This testing showed that the equipment was operating within all permit requirements, however the NOx emissions were very close to the permit limits of 25 pounds per hour. The stack testing was done at a process rate of the steam stripper that will allow GP to meet the four-year requirements, however, the stripper was operating below design rates. The NOx emissions appear to be related to fuelbound nitrogen content in the condensates that the Cluster Rule requires to be treated. Increasing the processing rate on the stripper to meet surge requirements or the eight-year rule requirements of the Cluster Rule could cause Cedar Springs Operations to exceed the NOx permit limit. Therefore, GP requests an increase on the NOx limit on the NCG/SOG incinerator from 25 pounds an hour to 50 pounds an hour. GP believes this request is no different than the original PCP application with respect to its overall benefit to the environment and therefore this issue can be resolved without triggering PSD applicability.

The original PCP application estimated NOx emissions based on the incinerator vendor guarantee. The vendor based its guarantee on one mill's experience in Europe, which apparently has less nitrogen content in its condensates than in the southern United States. During the stack testing it became apparent that the NOx emission rate was directly proportional to the rate of condensate fed to the steam stripper. The tests showed that a stripper feed rate of 400 gallons per minute had approximately 25 pounds an hour of NOx emissions. The facility would like to operate the stripper at its nominal design feed rate, approximately 800 gallons per minute. This will allow GP to maximize the time that the stripper can be down and still maintain compliance with the condensate collection and treatment requirements of the Cluster Rule. There are no nitrogen-based additives that are used in the process. The nitrogen compounds would appear to be coming from the

wood supply. With this change, the emission rates proposed for the NCG/SOG incinerator are listed below:

Maximum Emission Rates From the Incinerator/Scrubber

Pollutant	Peak Emission Rate (lbs/hr)	Annual Emission Rate (tpy)
Carbon Monoxide *	8	35.0
Nitrogen Oxides *	50	219.0
Particulate Matter *	9	39.4
Sulfur Dioxide *	9	39.4
TRS	0.7	3.1
Sulfuric Acid Mist *	12	52.6
VOC as CH ₃ OH	9	39.4

*Based on data from stack test performed March 29, 2001

All the same benefits that were agreed upon with the Division in the original PCP application still apply to this request. This change will have no affect on the production capacity of the Cedar Springs Operation. In March 1998, GP submitted a Prevention of Significant Deterioration (PSD) application for Causiticizing Expansion. In that application, all areas of the mill were modeled at maximum emission rates to show that the mill complied with all National Ambient Air Quality Standards (NAAQS) even at worst-case conditions. This additional NOx increase is very slight when considered with the emission rates modeled in that permit application as shown in the Table 1-2 below:

Estimated Changes in Actual emissions from "Affected" Sources (TPY)

	PM	PM10	SO2	NOx	CO	VOC	TRS	SAM
Past Actual (2728 ADT/D)*	2,252	2,263	11,531	4,805	10,015	2,059	438	94
Future Actual (2768 ADT/D)	2,268	2,278	11,611	4,957	10,048	2,041	423	146.6
Increase %	16	15	80	152	33	-18	-15	52
Increase	0.7%	0.7%	0.7%	3.2%	0.3%	NA	NA	55.3%

* 2728 ADT/D is the anticipated upper limit of the Kraft pulping capacity, as modeled in the Causiticizing Expansion PSD Permit Application submitted March 1998

An applicant for a PCP permit is required to conduct an air quality analysis to determine the ambient impacts associated with the modified source. The primary purpose is to demonstrate that new emissions will not cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS) or a PSD increment.

The facility results of the air quality modeling analysis to demonstrate compliance with the NAAQS and PSD increments are summarized in the following table.

Pollutant	Averaging Period	Summary of Modeling Results			
		NAAQS Sources		PSD Increment Sources	
		Modeled Concentration (mg/m ³)	NAAQS (mg/m ³)	Modeled Concentration (mg/m ³)	Class II PSD Increment (mg/m ³)
NO ₂	Annual	42.5	100	12.0	25

As can be seen from the preceding table, the facility, as it will exist following the proposed NO_x limit increase, will not cause or contribute to a violation of the NAAQS or PSD increments. The potential emissions from other pollutants were not greater than the significant emission rates. As such, modeling to demonstrate compliance with the NAAQS, PSD increments, or comparison with significant impact levels was only required for nitrogen oxides. Jim Stogner, Data and Modeling Unit, reviewed the ISCST3 modeling submitted by the facility. He also concluded that the projected values are below the NAAQS and PSD Class II increments for NO₂.

In addition to the NO_x increase, the following modifications were requested:

The removal of Conditions 3.4.12 and 6.2.10. The Division has determined that Georgia Rule (g)1, "Sulfur Dioxide" was not intended to be applied to Recovery Boilers based on a review of the SIP submitted for Rule (g). However, Rule (g)2 (3% Sulfur) is applicable to all fuel burning sources based on the same review.

The removal of Condition 3.3.24. This is a redundant condition. It is already covered in Condition 3.3.18.

The inclusion of temperature on the incinerator and pH on the incinerator scrubber based on the initial performance test conducted on March 30 and 31, 2001.

The addition of Test Methods 17 and 19 to Condition 4.1.3. The deletion of Method 25. GP also requested the addition of Method 25A. Method 25A will not be added, however, a statement specifying how VOC emissions from the NCG incinerator are to be determined will be added in Condition 4.1.3.

The facility requested the removal of Conditions 4.2.3, 4.2.4, 4.2.5, 4.2.6, and 4.2.8. Even though these conditions have already been met, these conditions will remain in the permit. They will be removed upon permit renewal.

The modification of Condition 5.2.2(d) to include the EPA approved alternative monitoring request.

The correction of Condition 5.2.7. A typo was made in the original permit.

Condition 6.1.7.c.x. was modified to include the pH and flow rate parameters set in the performance test. The condition incorrectly stated that the pH parameter set would be 90% of the value established. After further review, the pH will be set at the pH on the scrubber during the test.

Condition 6.1.7.a.viii was modified to include the temperature from the performance test. The temperature at which the incinerator operated during the performance test was 1294°F. The Division will allow a 50 ° variance.

The removal of Condition 6.2.14. This is a redundant condition. Condition 3.3.21 is more stringent.

The facility also requested the removal of Condition 3.3.30 concerning the applicability of 40 CFR 60 Subpart Kb to process flow through tanks. The Division has not received confirmation on this issue, therefore, this condition will remain in the permit.

4. Overall Process Flow Diagram (optional)

See Title V application TV-9141.

E. Regulatory Status

1. PSD/NSR

This modification will not change the accepted PSD avoidance limits.

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	Y	X		
PM ₁₀	Y	X		
SO ₂	Y	X		
VOC	Y	X		
NO _x	Y	X		
CO	Y	X		
TRS	Y	X		
H ₂ S	Y	X		

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
Individual HAP	Y	X		
Total HAPs	Y	X		

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.

The facility is also subject to 40 CFR 63 Subpart MM - National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	Yes
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

No facility wide emission or operating cap is being added or changed.

B. Applicable Rules and Regulations

The facility applicability toward any federal and state rules will not change as a result of this modification.

C. Compliance Status

No compliance problems exist at this time.

D. Operational Flexibility

The facility has not requested any operational flexibility.

E. Permit Conditions

Not Applicable

III. Regulated Equipment Requirements

A. Brief Process Description

See permit narrative for review of permit application no. TV-9141.

B. Equipment List for the Process

No changes were made to the equipment list as a result of application No. 13111

C. Equipment & Rule Applicability

Emission and Operating Caps –

There will be no changes in emission or operating caps as a result of this modification.

Applicable Rules and Regulations -

There will be no new applicable rules or regulations as a result of this modification.

D. Compliance Status

The Division files do not indicate any compliance issues at the facility.

E. Operational Flexibility

None requested by the facility.

F. Permit Conditions

Condition 3.3.17 has been modified to increase the limit of nitrogen oxide emissions from 25 lb/hr to 50 lb/hr. See Section I.D. for discussion.

Condition 3.3.17.d has been modified to remove the words “measured as methanol” from the condition. After further review, the Division determined the VOC emissions should be reported as VOC not methanol. The methods in Condition 4.1.3 have also been modified accordingly.

Condition 3.3.24 has been removed from the Title V permit. It is a redundant condition. It is already covered in Condition 3.3.18.

Condition 3.4.12 has been removed from the Title V permit. The Division has determined that Georgia Rule (g)1, “Sulfur Dioxide” was not intended to be applied to Recovery Boilers based on a review of the SIP submitted for Rule (g). However, Rule (g)2 (3% Sulfur) is applicable to all fuel burning sources based on the same review.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

Method 17 for the determination of particulate matter emissions and Method 19 for the determination of the nitrogen oxides emissions rate were added to the Title V permit.

The permit is being modified to state more correctly the determination of VOC emission rates from the NCG incinerator. A correction of the applicable test procedures has been made. Method 308, Method 16, and Method 18 are required to obtain the sum of all VOC compounds to determine compliance with the limit of Condition 3.3.17.

A statement for the determination of VOC emission rates from the NCG incinerator was added to Section 4.1.3. Method 25 for the determination of total VOC emission reported as Methanol was removed from the permit. Method 17 was removed from 4.1.3.e and listed as its own method.

B. Specific Testing Requirements

No new testing requirements will be added as a result of application no. 13111.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

No new general monitoring requirements will be added as a result of application no. 13111.

B. Specific Monitoring Requirements

No new specific monitoring requirements will be added as a result of application no. 13111. However, the following modifications and deletions have been made to the Title V permit.

EPA approved the facility's alternative monitoring request in letter from R. Douglas Neely, Chief, Air and Radiation Technology Branch, dated May 15, 2001 for the plant's incinerator. Accordingly, Condition 5.2.2.d has been modified as follows:

- 5.2.2 d. ~~Temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs in~~ at the back end of the first pass of the incinerator (Source Code R425).
[40 CFR 63.453(b)]

Condition 6.1.7.c.x. was modified to include the pH and flow rate parameters set in the performance test. The condition incorrectly stated that the pH parameter set would be 90% of the value established. After further review, the pH will be set at the pH on the scrubber during the test.

- 6.1.7.c.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 ~~is not maintained within 90% of the value established by the initial performance test as specified in 4.2.3.~~ falls below the following parameters:
[391-3-1-.02(2)(a)(10)]

(A) Scrubber pH: 8.2

(B) Scrubber recycle flow rate: 494 gpm.

Condition 6.1.7.a.viii was modified to include the temperature from the performance test. The temperature at which the incinerator operated during the performance test was 1294°F. The Division will allow a 50 ° variance. Condition 6.1.7.viii has been modified as follows:

- 6.1.7.a.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 ~~the baseline temperature established during the initial performance test required by Condition 4.2.5.~~ 1244 °F.
[40 CFR 63.443(d)]

- 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(a)(2), 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)]

VI. Other Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

No new general record keeping or reporting requirements will be added as a result of application no. 13111.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.10 has been removed from the Title V permit. The Division has determined that Georgia Rule (g)1, "Sulfur Dioxide" was not intended to be applied to Recovery Boilers based on a review of the SIP submitted for Rule (g). However, Rule (g)2 (3% Sulfur) is applicable to all fuel burning sources based on the same review.

Condition 6.2.14 has been removed from the Title V permit. This is a redundant condition. Condition 3.3.21 requires that all NCG or TRS emissions from the LVHC system to be controlled. Condition 6.1.7.b.xii requiring the reporting of all LVHC system vents has been replaced with Condition 6.1.7.d.viii. EPD and GPPA, of which the facility is a member, agreed that any release from the LVHC system that is less than five minutes and that is self-correcting is not a reportable vent. However, the Division is requiring that all vents in excess of 5 minutes including startup, shutdown, and malfunction be reported.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Not Applicable

C. Insignificant Activities

There will be no changes made to the insignificant activities as a result of application no. 13111.

D. Temporary Sources

No new temporary sources are being added as a result of this modification.

E. Short-Term Activities

No new short-term activities are being added as a result of this modification.

F. Compliance Schedule/Progress Reports

The facility is in compliance per Division files.

G. Emissions Trading

Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

The facility's modification does not change the source's applicability.

K. Pollution Prevention

Not Applicable

L. Specific Conditions

None

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

Comments and requested changes were received from Dave Massengill via e-mail on November 28, 2001. Public comments were received from Robert Ukeiley for the Georgia Center for Law in the Public Interest. No EPA comments were received.

Facility comments dated November 28, 2001:

1. Permit condition 6.1.7 d v. needs to be removed from the permit due to the deletion of condition 6.2.14. Also, if possible we would prefer the language used in Riverwood's Title V permit for condition 6.1.7 d viii. Riverwood's permit condition includes the additional wording "excluding periods of startup, shutdown, or malfunction".

Response: Condition 6.1.7.d.v was removed from the final amendment. Riverwood's permit has been corrected. It no longer includes the wording "excluding periods of startup, shutdown, or malfunction".

~~6.1.7.d.v The bypass record, as stated in Condition 6.2.14, for the specified periods of TRS control device bypass during the quarter.~~

2. As we discussed in our phone conversation, Cedar Springs requests that permit condition 6.1.7 x.(Treatment) be changed to read "Any 15-day rolling period during which the treatment of the pulping condensate removes less than 92 % of the available methanol.

Response: This was not part of the original application and did not go through public comment, therefore, this condition cannot be modified as part of this amendment. This modification would also involve changing Condition 3.3.29.

3. Permit condition 6.1.7 ix. (Stripper, Incinerator/Scrubber System) can be changed to read " Any 3-hour average during which the stripper effective steam to condensate ratio is less than 0.078." The 0.078 value is 90% of the 0.087 ratio established in our the initial performance test and approved by the Division in written correspondence dated November 21, 2001.

Response: Treatment test conducted August 30, 2001, has been approved by ISMP. The facility proposed a ratio of effective steam to condensate flow as the trigger value. The three test runs resulted in ratios of 0.090, 0.089, and 0.087. 90% of the lowest value is 0.08. Condition 6.1.7.a.ix also includes process wastewater column feed temperature monitoring. The Division will allow a 50° variance from the performance test. The trigger value will be 185.2 °F.

~~6.1.7.a.ix. Any 3 hour average during which the process wastewater feed rate, steam feed rate or process wastewater column feed temperature for the steam stripper measured in accordance with 5.2.2(e), is not maintained within 90% of the parameter established during the initial performance test required by Condition 4.2.3.
[40 CFR 63.453(g)]~~

6.1.7.a.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)]

4. Permit condition 6.1.7.a.vii. (Stripper, Incinerator/Scrubber System) can be removed from the permit since we have completed our performance test for the incinerator.

Response: Even though this condition has already been met, this conditions will remain in the permit. It will be removed upon permit renewal.

Comments received from the Georgia Center for Law and the Public Interest dated December 20, 2001:

General Comments

1. EPD's Public Notice Procedures are not adequate.

A comment was made that the EPD's public notice stated that all relevant information used in developing the draft Title V permit was available at the Air Protection Branch in Suite 120. The commenter states that this may not be accurate, noting that relevant material may be available only in the EPD regional office and other agencies, especially in the case of accidental releases under Clean Air Act § 112(r).

Response: All information used in the development of the draft Title V permit is located at the Air Protection Branch offices as indicated in the public notice.

A comment was made objecting to the sentence in the public notice that objects to our stating that we "consider all comments, make any necessary changes and issue the Title V operating permit." The commenter counters that, "under certain circumstances, EPD is required to refuse to issue a Title V permit" as per 40 CFR §70.7(a). The commenter complains that our public notice "could be interpreted as an indication of EPD's predisposition to issue Title V permits regardless of whether the permit complies with the law." The commenter concludes, "Therefore, we suggest that EPD include in the public notice an additional statement that it will make a determination of whether to issue or deny the permit."

Response: EPD has determined that the language in the public notice meets the Public Notification requirements of 40 CFR 70.7(h)(2). EPD has not received any information to indicate that a Part 70 operating permit should be denied for this facility.

2. The Permit cannot limit credible evidence from being used in an enforcement action.

Response: Two of the conditions specifically listed in this comment (Conditions 8.17.1 and 6.1.3) were not part of the Title V amendment, therefore, are not open for comment.

The prescribed performance test methods and procedures, which are incorporated in the Georgia Rules for Air Quality Control, contain clear provisions that, by prescribing such procedures, nothing would preclude the additional use of other credible evidence, either for compliance certifications or for establishing whether or not a source is in violation of any emissions limitation or standard. [See Rule 391-3-1.02(3)(a) and the referenced Procedures for Testing and Monitoring Sources of Air Pollutants at Section 1.3(g).] Even without this direct inclusion, the Rules themselves are cited in all permits issued by the Division.

Furthermore, the Division believes that adequate provisions for consideration of credible evidence have been included in Condition 8.17.1, which states, in part, that "Determination of whether acceptable operating and

maintenance procedures are being used will be based on any information available to the Division which may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source."

The Division has elected not to include any additional language beyond the Rules cited above because it is our belief that any attempt to clarify the rule or define credible evidence will generally produce an impression of limiting of the scope of the rule. This we do not wish to do. The Division believes that any challenge to the authority of the U.S. EPA, State of Georgia, or any citizen with standing to use any credible evidence would easily be turned away. On the other hand, if limiting language such as that offered in the referenced EPA text were to be used, arguments to use such statements to "whither away" at the general principle could and most probably would be made. For instance, petitioners might suggest that the statement was only meant to apply to stated test methods and not work practice or other parts of the applicable standards, including the general provisions to the rules. Therefore, for the benefit of the enforceability of the standards by using any credible evidence available, the permit need not and is not being modified.

3. The Permit must require prompt reporting of deviation from permit requirements.

Response: The conditions specifically listed in this comment (Conditions 6.1.2 and 6.1.3) were not part of the Title V amendment, therefore, are not open for comment.

The monitoring, record keeping and reporting requirements contained in parts 5.0 and 6.0 of the permit were determined by the Division, which is the permitting authority, and have also been approved by EPA. These reporting requirements, which do require semiannual reporting of routine data, also require reporting within seven days of malfunctions or breakdowns lasting four hours or more which result in excessive emissions.

4. Allowing changes in test methods violates public and EPA participation requirements.

A comment was made that "ALLOWING CHANGES IN TEST METHODS VIOLATES PUBLIC AND EPA PARTICIPATION REQUIREMENTS." Condition 4.1 states that the permittee can make minor changes in test methodology if the changes are more reliable. This provision defeats the requirement that the public and the EPA should have an opportunity to comment on the Title V permit because the permittee can now make numerous changes that the public and EPA may never know about. In addition, unbridled discretion such as not defining "minor changes" and allowing changes where there is no way to determine if they are more reliable is arbitrary and capricious.

Response: The term "minor changes..." as used in the permit has been accepted by USEPA and is allowed under the cited Rule, 391-3-1-.02(3)(a), in the following manner: The Rule incorporates by reference the Division's compilation of **Procedures for Testing and Monitoring Sources of Air Pollutants** as the source of the required procedures and test methods. In Section 1.2(b), of that document an allowance is made to approve "...minor changes in methodology..."

Specific Comments

5. The Permit modification must go through PSD review because this is not a pollution control project.

Response: Per EPA guidance document dated July 1, 1994, certain types of projects (involving source categories other than utilities) may qualify on a case-by-case basis for an exclusion from major NSR as pollution control projects. The Division approved and issued the permit for the PCP in 1999.

6. Rule g(1) is an applicable requirement.

Response: The Division has determined that Georgia Rule (g)1, "Sulfur Dioxide" was not intended to be applied to Recovery Boilers based on a review of the SIP for Rule (g). However, Rule (g)2 (3% Sulfur) is applicable to all fuel burning sources based on the same review.

Draft Permit Review		
Reviewing Program	Comments Received (y/n)?	Comments Taken into Consideration in Draft Permit (y/n)?
ISMP	Yes	Yes
SSCP	No	Not Applicable

SSPP Unit Manager: _____
 Heather Abrams Date

SSPP Program Manager: _____
 Jimmy Johnston Date