

Part 70 Operating Permit Amendment

Permit Amendment No.: 2631-099-0001-V-02-4

Effective Date: February 13, 2008

Facility Name: Georgia-Pacific Corporation, Cedar Springs Operation

Facility Address: Highway 273 West
Cedar Springs, Georgia 39832 (Early County)

Mailing Address: P. O. Box 44
Cedar Springs, Georgia 39832 (Early County)

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

Modification to the No. 2 Paper Machine.

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. 2631-099-0001-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit no. #2631-099-0001-V-02-0.

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. TV-17094 dated November 11, 2006; any other applications upon which this Permit Amendment or Permit No. 2631-099-0001-V-02-0 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 7 pages.

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The facility is proposing to modify the No.2 Paper Machine by installing an electric motor drive and stationary siphons, upgrading the dryer can condensate system and the removing steam driven shaft. The modification will increase the paper machine production by 52 ADTP/day.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None Applicable.

2.2 Facility Wide Federal Rule Standards

None Applicable.

2.3 Facility Wide SIP Rule Standards

None Applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None Applicable.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

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

3.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
M702	No. 2 Paper Machine	391-3-1-.02(2)(b)1 40 CFR 52.21	3.2.17, 3.2.18, 3.4.26, 6.17, 6.2.50, 6.2.51, 6.2.52	Na	None

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

3.2 Equipment Emission Caps and Operating Limits

Paper Machine

3.2.17 The permittee shall not discharge or cause to discharge into the atmosphere from the No. 2 paper machine (Source Code: M702) any gases which contain:
[Avoidance of 40 CFR 52.21]

(a) volatile organic compounds in excess of 103.0 tons per year.

3.2.18 The permittee shall not process more than 41,870 air dried tons of pulp per month based on a 30 day rolling average and 420,354 air dried tons of pulp per year based on a 12 month rolling average in the No. 2 Paper Machine.

3.3 Equipment Federal Rule Standards

3.3.9 The Permittee shall comply with all applicable provisions of Federal Standard 40 CFR 63 Subpart DDDDD—“National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters”.
[40 CFR 63 Subpart DDDDD]

3.4 Equipment SIP Rule Standards

3.4.26 The Permittee shall not cause, let, suffer, permit or allow emissions from the No. 2 Paper Machine (Source Code: M702) the opacity of which is equal to or greater than forty (40) percent.
[Georgia Rule 391-3-1-.02(2)(b)1]

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:

- 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)

Lime Kilns No. 1 and No. 2 and Smelt Tanks No. 1, No. 2, and No. 3

- i. The scrubbers on each smelt dissolving tank or each lime kiln will have been operated in violation of 40 CFR 63 Subpart MM if any 3-hour averaged parameter monitored in accordance with Condition 5.2.2.a, 5.2.2.b, or 5.2.2.c undergoes one of the following deviations, listed in Conditions 6.1.7.b(i)(A) through 6.1.7.b(i)(J), 6 or more times within any 6-month reporting period (excluding periods of startup, shutdown, or malfunction). For the purposes of determining the number of non-opacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period.
[40 CFR 63 Subpart MM; 40 CFR 63.864(k)(2)(iii) and 40 CFR 63.864(k)(3)]

(P) While Lime Kiln No. 1 (Source Code L600) is subject to Condition 3.2.1, any 12 consecutive month period where lead (Pb) emissions from Lime Kiln No.1, as calculated in accordance with Condition 6.2.48, exceed 0.17 tons.
[Avoidance of 40 CFR 52.21]

(V) While Lime Kiln No. 2 (Source Code L600) is subject to Condition 3.2.1, any 12 consecutive month period where lead (Pb) emissions from Lime Kiln No.2, as calculated in accordance with Condition 6.2.48, exceed 0.20 tons.
[Avoidance of 40 CFR 52.21]

Paper Machine

- xxiv. The permittee would be considered to have operated in exceedance of its permit limits if it deviates from any conditions listed below
 - A. While the No. 2 Paper Machine (Source Code M702) is subject to Condition 3.2.18 any 30 day rolling period during which the quantity of pulp processed in the No. 2 Paper Machine (Source Code M702)

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measured and recorded in accordance with Condition 6.2.50 exceeds 41,870 tons.

[Avoidance of 40 CFR 52.21]

B. While the No. 2 Paper Machine (Source Code M702) is subject to Condition 3.2.18 any 12 month consecutive period during which the quantity of pulp processed in the No. 2 Paper Machine (Source Code M702) measured and recorded in accordance with Condition 6.2.50 exceeds 420,354 tons.

[Avoidance of 40 CFR 52.21]

C. While No. 2 Paper Machine (Source Code M702) is subject to Condition 3.2.17, any 12 consecutive month period where Volatile Organic Compound (VOC) emissions, as calculated in accordance with Condition 6.2.51, exceed 103.0 tons.

[Avoidance of 40 CFR 52.21]

6.2 Specific Record Keeping and Reporting Requirements

Power Boilers No. 1 and No. 2

6.2.18 For each calendar day and while Power Boiler No. 1 (Source Code U500) is subject to Condition 3.5.1, the Permittee shall calculate the tons of sulfuric acid mist (SAM), particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) emitted from the boiler. All hourly averaged data necessary to perform these calculations shall be maintained. The calculations for each calendar day must be complete with 72 hours following the end of that calendar day. The equations to be used for each calculation follow. [Avoidance of 40 CFR 52.21]

a. SAM Emissions:

$$\text{SAM, } \frac{\text{ton}}{\text{day}} = \sum_{i=1}^{24} \left[\left(\text{SAM Emission Factor, } \frac{\text{lb/hr SAM}}{\text{lb/hr SO}_2} \right) \left(\text{SO}_2 \text{ Emission Rate, } \frac{\text{lb}}{\text{hr}} \right) \left(\frac{1 \text{ ton SAM}}{2,000 \text{ lb}} \right) \right]$$

b. PM Emissions:

$$\text{PM, } \frac{\text{ton}}{\text{day}} = \sum_{i=1}^{24} \left[\left(\text{Total Heat Input, } \frac{\text{MMBtu}}{\text{hr}} \right) \left(\text{PM Emission Factor, } \frac{\text{lb}}{\text{MMBtu}} \right) \left(\frac{1 \text{ ton PM}}{2,000 \text{ lb}} \right) \right]$$

c. NO_x Emissions:

$$\text{NO}_x, \frac{\text{ton}}{\text{day}} = \sum_{i=1}^{24} \left[\left(\text{F-Factor } i, \frac{\text{DSCF}}{\text{MMBtu}} \right) \left(\frac{20.9\%}{20.9\% - \text{O}_2\%} \right) \left(\frac{\text{NO}_x \text{ Conc } i, \text{ lb}}{10^6 \text{ lb}} \right) \left(\text{Gas Dens, } \frac{\text{lb}}{\text{gal}} \right) \left(\frac{7.48 \text{ gal}}{\text{ft}^3} \right) \left(\text{Heat In } i, \frac{\text{MMBtu}}{\text{hr}} \right) \left(\frac{1 \text{ ton NO}_x}{2,000 \text{ lb}} \right) \right]$$

d. CO Emissions:

$$\text{CO, } \frac{\text{ton}}{\text{day}} = \sum_{i=1}^{24} \left[\left(\text{F-Factor } i, \frac{\text{DSCF}}{\text{MMBtu}} \right) \left(\frac{20.9\%}{20.9\% - \text{O}_2\%} \right) \left(\frac{\text{CO Conc } i, \text{ lb}}{10^6 \text{ lb}} \right) \left(\text{Gas Dens, } \frac{\text{lb}}{\text{gal}} \right) \left(\frac{7.48 \text{ gal}}{\text{ft}^3} \right) \left(\text{Heat In } i, \frac{\text{MMBtu}}{\text{hr}} \right) \left(\frac{1 \text{ ton CO}}{2,000 \text{ lb}} \right) \right]$$

e. SO₂ Emissions:

$$\text{SO}_2, \frac{\text{ton}}{\text{day}} = \sum_{i=1}^{24} \left[\left(\text{F-Factor } i, \frac{\text{DSCF}}{\text{MMBtu}} \right) \left(\frac{20.9\%}{20.9\% - \text{O}_2\%} \right) \left(\frac{\text{SO}_2 \text{ Conc } i, \text{ lb}}{10^6 \text{ lb}} \right) \left(\text{Gas Dens, } \frac{\text{lb}}{\text{gal}} \right) \left(\frac{7.48 \text{ gal}}{\text{ft}^3} \right) \left(\text{Heat In } i, \frac{\text{MMBtu}}{\text{hr}} \right) \left(\frac{1 \text{ ton SO}_2}{2,000 \text{ lb}} \right) \right]$$

For the purposes of this condition, the variable *i* represents hour *i* of the calendar day and any emission factors or F-factors used in the above calculations will be established upon the most recent Division-approved performance testing.

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Lime Kilns No. 1 and No. 2

6.2.47 At the end of each calendar month for No. 1 Lime Kiln and No.2 Lime Kiln the Permittee shall calculate and record both monthly emission totals and twelve-month rolling emission totals for each of the following criteria pollutants: Total Reduced Sulfur Compounds (TRS), particulate matter (PM), Particulate matter less than 10 microns (PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), lead (Pb) and sulfuric acid mist (SAM)

[40 CFR 52.21 Avoidance for PM, PM₁₀, SO₂, CO, NO_x, VOC, TRS, Pb and SAM]

- a. For PM, PM₁₀, NO_x and CO the permittee shall use the production data recorded in Condition 6.2.1 and emission factors developed from the most recent performance test required per Condition 4.2.1 and 4.2.25. The emission factor shall be multiplied by the CaO production to calculate mass emission rates on a monthly basis.
- b. For TRS and SO₂, the permittee shall use the hours of operation data recorded per Condition 6.2.12 and monitoring data recorded per Condition 5.2.1 to calculate mass emission rates on a monthly basis.
- c. For VOC, SAM and Pb the permittee shall use the production data recorded in Condition 6.2.1 and emission factors contained in the lime mud dryer permit application. The emission factor used in the application shall be multiplied by the CaO production to calculate mass emission rates on a monthly basis.

6.2.48 When a monthly emission total for No.1 Lime Kiln calculated in accordance with 6.2.47 exceeds 1.17 tons for TRS, 6.4 tons for PM, 5.5 tons for PM₁₀, 5.0 tons for SO₂, 2.1 tons for CO, 5.1 tons for NO_x, 0.27 tons for VOC, 0.12 tons for SAM or 0.014 tons for Pb, the Permittee shall submit a statement indicating how the Permittee intends to meet the applicable limit(s) specified in Condition 3.2.1; this statement shall be submitted by the 30th day of the following calendar month. Records of all monthly and twelve-month rolling emission totals, records of demonstration calculations, records of any factors used in the calculation of criteria pollutant emissions, and other supporting documentation shall be maintained. These records shall be kept available for inspection by or submittal to the Division for a period of five years following the date of record.

[40 CFR 52.21 Avoidance for PM, PM₁₀, SO₂, CO, NO_x, VOC, TRS, Pb and SAM]

6.2.49 When a monthly total for No.2 Lime Kiln exceeds 1.4 tons for TRS, 4.4 tons for PM, 3.9 tons for PM₁₀, 6.0 tons for SO₂, 2.55 tons for CO, 6.2 tons for NO_x, 0.27 tons for VOC, 0.13 tons for SAM or 0.017 tons for Pb, the Permittee shall submit a statement indicating how the Permittee intends to meet the applicable limit(s) specified in Condition 3.2.1; this statement shall be submitted by the 30th day of the following calendar month. Records of all monthly and twelve-month rolling emission totals, records of demonstration calculations, records of any factors used in the calculation of criteria pollutant emissions, and other supporting documentation shall be maintained. These records shall be kept available for inspection by or submittal to the Division for a period of five years following the date of record.

[40 CFR 52.21 Avoidance for PM, PM₁₀, SO₂, CO, NO_x, VOC, TRS, Pb and SAM]

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Paper Machine

6.2.50 The permittee shall maintain daily and monthly records of the amount of pulp processed (in air dried tons per day) in the No.2 Paper Machine.

[40 CFR 52.21; 391-3-1-.02(2)(b)1; 40CFR 63.866(c)(2)]

6.2.51 At the end of each calendar month for No. 2 Paper Machine the Permittee shall calculate and record both monthly emission totals and twelve-month rolling emission totals by using the production data recorded in Condition 6.2.50 and volatile organic compounds (VOC) emission factors contained in the paper machine permit application or emission factor established during the most recent performance test. The emission factor shall be multiplied by the pulp production (air dried tons per day) to calculate mass emission rates on a monthly basis.

[40 CFR 52.21 Avoidance for VOC]

6.2.52 At the end of each calendar month and while the Paper Machine No. 2 (Source Codes M702) is subject to Condition 3.2.18, the Permittee shall calculate and record both 30 day rolling average emission totals and twelve-month rolling average emission totals for volatile organic compounds (VOC) using the daily results of Condition 6.2.51. When the 30 day rolling average VOC emission total exceeds 8.59 tons, the Permittee shall submit a statement indicating how the Permittee intends to meet the applicable limit(s) specified in Condition 3.2.18; this statement shall be submitted by the 30th day of the following calendar month. Records of all monthly and twelve-month rolling emission totals, records of demonstration calculations, records of any factors used in the calculation of criteria pollutant emissions, and other supporting documentation shall be maintained. These records shall be kept available for inspection by or submittal to the Division for a period of five years following the date of record.

[Avoidance of 40 CFR 52.21 for VOC]

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
2631-099-0001-V-02-3	July 24, 2007