

Facility Name: **Georgia-Pacific Corporation, Cedar Springs Operation**

City: Cedar Springs, Georgia

County: Early

AIRS #: 04-13-099-00001

Application #: 17094

Date SIP Application Received: November 11, 2006

Date Title V Application Received: November 11, 2006

Permit No: 2631-099-0001-V-02-3

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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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: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2631-099-0001-V-02-0	February 21, 2007	✓	
2631-099-0001-V-02-1	February 21, 2007	✓	
2631-099-0001-V-02-2	April 18, 2007		✓

**Table 2: Comments on Specific Permits**

Permit/Amendment Number	Comments
2631-099-0001-V-02-0	Title V Renewal
2631-099-0001-V-02-1	Was rescinded and incorporated in 2631-099-0001-V-02-2

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

This facility is major for PSD. See the narrative for permit 2631-099-0001-V-02-0 for a discussion of these 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	Yes	✓		
PM <sub>10</sub>	Yes	✓		
SO <sub>2</sub>	Yes	✓		
VOC	Yes	✓		
NO <sub>x</sub>	Yes	✓		
CO	Yes	✓		
TRS	Yes	✓		
H <sub>2</sub> S	Yes	✓		
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

## II. Proposed Modification

### A. Description of Modification

The facility is proposing to modify Paper Machine No. 2 by installing electric motor drives, upgrading the dryer can condensate system and the removing steam driven shaft. The modification will increase the uptime of the machine and as a result increase the paper machine production by 52 ADTP/day.

### B. Emissions Change

**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	Y	10.4	10.4
PM <sub>10</sub>	Y	9.2	9.2
SO <sub>2</sub>	Y	11.1	11.1
VOC	Y	17.2	17.2
NO <sub>x</sub>	Y	21.2	21.2
CO	Y	26.7	26.7
TRS	Y	3.9	3.9
H <sub>2</sub> S	Y	0	0
Individual HAP	Y	3.78	3.78
Total HAPs	Y	5.51	5.51

### C. PSD/NSR Applicability

Georgia-Pacific Corporation, Cedar Springs Operation is major for PSD; however, some limits have been taken to avoid PSD on certain projects. See the narrative for permit 2631-099-0001-V-02-0 and subsequent modifications for a discussion of these limits.

The increase paper machine production will result in increased emissions from the support units i.e. the woodyard, fiberline, recovery and causticizing operations. The replacement of the steam driven turbine with an electric motor will result in steam savings and hence will not cause an increase in emissions from the power boiler.

The facility is a major source for PSD and hence the facility has to demonstrate that the increase emissions as a result of this project will not trigger PSD review. The emissions analysis are presented in Attachment B of the initial submittal and were subsequently resubmitted. A summary of the netting analysis is presented in Table 4 above and the detail calculations are presented as an attachment to this narrative. As indicated in Table 4 the emission increase as a result of the proposed modifications are below the PSD significance threshold and hence the proposed project will not trigger a PSD review.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

There are no new facility-wide emission and operating caps associated with this modification.

B. Applicable Rules and Regulations

There are no new facility-wide rules and regulations associated with this modification.

C. Compliance Status

The facility did not indicate that they are out of compliance with any facility-wide applicable rules and regulations in the application for this modification.

D. Operational Flexibility

The facility did not request any operational flexibility with this modification.

E. Permit Conditions

There are no new permit conditions in Section 2.0 of the permit due to this modification.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

Please see the process description given in the original Title V narrative.

B. Equipment List for the Process

**Table 5: Revised 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		No Controls

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

A. Equipment & Rule Applicability

The equipment listed in Table 5 of this narrative is subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(b)— “Visible Emissions”  
(Subsumed by Georgia Rule 391-3-1-.02(2)(d))

Equipment Emission Caps and Operating Limits

None

Equipment Federal Rule Standards

The pulp and paper NSPS does not have any requirement that apply to paper machine.

Equipment SIP Rule Standards

This amendment does not include any new equipment SIP Rule Standards.

D. Compliance Status

The facility did not indicate that they are out of compliance with any applicable rules and regulations in the application for this modification.

E. Operational Flexibility

There are no requests for operational flexibility for this modification.

F. Permit Conditions

Equipment Emission Caps and Operating Limits for No. 2 Paper Machine

Condition 3.2.17 was added to limit the VOC emissions from No. 2 paper machine.

Condition 3.2.18 was added to limit the monthly and annual production capacity of the No. 2 Paper Machine.

Condition 3.4.26 was added since the paper machine is subject to Rule B.

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

No new testing requirements are added.

B. Equipment Groups (all subject to the same test requirements):

None applicable.

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

No new monitoring requirements are added.

B. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

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

Condition 6.1.7. xxiv was added to define the exceedence limits for the paper machine.

Condition 6.2.50 was added to require recording the daily and monthly paper machine production rates.

Condition 6.2.51 was added requiring the facility to calculate VOC emissions on a monthly basis.

Condition 6.2.52 was added requiring the facility to report when the VOC emissions exceed 103.0 tons per year.

## **VIII. Specific Requirements**

- A. Operational Flexibility—Not Applicable.
- B. Alternative Requirements—Not Applicable.
- C. Insignificant Activities—Not Applicable.
- D. Temporary Sources—Please see previous discussion.
- 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

This modification does not change the source's applicability.

- J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability.

- K. Pollution Prevention—Not Applicable.

- L. Specific Conditions

Special condition 7.14.1 was added requiring the facility to demonstrate compliance with Georgia Air Toxic Standards within 60 days of the issuance of the final permit.

**Addendum to Narrative**

The 30-day public review started on August 1, 2007 and ended on August 30, 2007. Comments were received from the company by the Division. No comments were received by the public or USEPA.

Each comment is printed below, followed by a discussion of the comment and any changes made to the permit as a result. Due to the changes in permit no. 2631-099-0001-V-02-3 it is revoked and reissued as permit no. 2631-099-0001-V-02-4.

Comment: The facility requested to change the language in Condition 7.14.1 language to read as follows:.

Within 30 days of the effective date of this permit, the Permittee shall submit a modeling report to show compliance with the *Georgia Guidelines of Ambient Impact Assessment of Toxic Air Pollutant Emissions* for toxic air pollutants from the entire facility. If the modeling does not show compliance with the *Georgia Guidelines of Ambient Impact Assessment of Toxic Air Pollutant Emissions* for toxic air pollutants from the entire facility then the permittee will submit a plan to attain compliance for EPD's approval.

Response: The Division has removed the permit condition 7.141 since the facility has submitted the modeling demonstrating compliance with Georgia air toxic guidelines.

Comment: The facility has requested that the Condition 3.3.9 that requires the facility to demonstrate compliance with Subpart DDDDD be either completely removed or that at minimum remove the reference to the compliance date of Sept 13, 2007 in light of July 30, 2007 decision by DC Circuit Court of Appeals to vacate Subpart DDDDD.

Response: The compliance date of Sept 13, 2007 from Condition 3.3.9 has been removed in this permit amendment.

Please note that the remaining comments are not related to the paper machine project, they are general comments to clarify certain permit conditions or correct error(s) in the current Title V permit.

Comment: For 2631-099-0001-V-02-0 Condition 6.1.7(c)(vi)(B) – The compliance test required by condition 4.2.2 were performed last month. Per 4.2.2(b), the scrubber limits are established based on this test. The test average differential pressure and scrubbant flow during the compliance test were 16.8 inches of water and 3,603 gpm, respectively. We are requesting the new limits be established 10% below the operating levels during the compliance test, which will be 15.1 inches of water and 3,242 gpm.

Response: The request was denied since the Division has not had a chance to review the test report at the time of this amendment. Once the test is approved the facility can request that the changes be made.

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

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Comment: For 2631-099-0001-V-02-2 Condition 6.1.7(c)(i)(B) – The compliance test required was completed August 21 Per 4.2.25, the venturi scrubber limits are reestablished based on this test. The test average differential pressure and scrubbant flow during the compliance test were 17.1 inches of water and 500 gpm, respectively. We are requesting the new limits be established 10% below the operating levels during the compliance test, which will be 15.4 inches of water and 450 gpm.

Response: The request was denied since the Division has not had a chance to review the test report at the time of this amendment. Once the test is approved the facility can request that the changes be made.

Comment: For 2631-099-0001-V-02-2 Condition 6.1.7(b)(i)(P) – Currently reads “*While lime kiln No. 1 is subject to condition 3.2.1, any 2 consecutive month period where lead any 2 consecutive month period...*”. Please correct to read “*While lime kiln No. 1 is subject to condition 3.2.1, any 12 consecutive month period where lead...*”.

For 2631-099-0001-V-02-2 Condition 6.1.7(b)(i)(V) – Currently reads “*While lime kiln No. 2 is subject to condition 3.2.1, any 2 consecutive month period where lead any 2 consecutive month period...*”. Please correct to read “*While lime kiln No. 2 is subject to condition 3.2.1, any 12 consecutive month period where lead...*”

Response: The division has corrected the error and has revised permit Condition 6.1.7(b)(i)(P) and Condition 6.1.7(b)(i)(V) accordingly.

Comment: For 2631-099-0001-V-02-0 Condition 6.2.18(c)-(e) – In each equation, the portion that has the NO<sub>x</sub>, CO, and SO<sub>2</sub> CEM concentration needs to be changed read as follows. Only showing NO<sub>x</sub> as an example.

$$\frac{NO_x \text{ conc., lb}}{10^6 \text{ lb}}$$

Response: The division has corrected the error and has revised permit Condition 6.2.18(c) through (e) accordingly.

Comment: For 2631-099-0001-V-02-2 Condition 6.2.47(a) – Currently reads “... *most recent performance test required per Condition 4.2.1 and 4.2.5*.” The condition referenced should be 4.2.25 instead of 4.2.5.

Response: The division has corrected the error and has revised permit Condition 6.2.47(a) accordingly.

Comment: For 2631-099-0001-V-02-2 Condition 6.2.47(b) – Currently reads “*For TRS and SO<sub>2</sub> **the**, the permittee shall use the hours of operation data recorded **in** Condition **6.2.11** and monitoring data recorded per condition **no** 5.2.1 to calculate mass emission rates on a monthly basis.*”

Please change to the following: *“For TRS and SO<sub>2</sub>, 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.*

Response: The division has corrected the error and has revised permit Condition 6.2.47(b) accordingly.

Comment: For 2631-099-0001-V-02-2 Condition 6.2.48 – Currently the condition states *“When the twelve month rolling total for...”*. The condition is intended to require us to submit a statement if a monthly total is over 1/12 of the 12-month rolling limit for any parameter. Please correct the condition to read as follows: *“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 PM<sub>10</sub>, 5.0 tons for SO<sub>2</sub>, 2.1 tons for CO, 5.1 tons for NO<sub>x</sub>, 0.27 tons for VOC, 0.12 tons for SAM, 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;...”*

Response: The division has corrected the error and has revised permit Condition 6.2.48 accordingly.

Comment: Condition 6.2.49 – Currently the condition states *“When the twelve month rolling total for...”*. The condition is intended to require us to submit a statement if a monthly total is over 1/12 of the 12-month rolling limit for any parameter. Please correct the condition to read as follows: *“When a monthly emission total for No. 2 lime kiln calculated in accordance with 6.2.47 exceeds 1.4 tons for TRS, 4.4 tons for PM, 3.9 tons for PM<sub>10</sub>, 6.0 tons for SO<sub>2</sub>, 2.55 tons for CO, 6.2 tons for NO<sub>x</sub>, 0.27 tons for VOC, 0.13 tons for SAM, 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;...”*

Response: The division has corrected the error and has revised permit Condition 6.2.49 accordingly.