

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

City: Cedar Springs

County: Early

AIRS #: 04-13-099-00001

Application #: TV- 9141

Date Application Received: October 22, 1996

Date Application Deemed

Administratively Complete: April 11, 1997

Date of Draft Permit:

Permit No: 2631-099-0001-V-01-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operation permit. 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 proposed pursuant to: (1) Section 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 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 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 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
2631-049-10296 (Recovery Boiler Nos. 1 and 2; Smelt Tank Nos. 1 and 2; No. 3 Concentrator; No. 12 Batch Digester; and Incineration of TRS gases in Lime Kiln Nos. 1 and 2)	Original Issue Date: 12-8-89 Amendment Dates: 5-31-90, 12-7-90, 2-22-91, 9-17-91, 3-19-98		T
2631-049-10569 (Recovery Boiler No. 3 and Smelt Tank No. 3)	Original Issue Date: 8-6-90 Amendment Date: 9-28-94	T	
2631-049-4527-O (Power Boiler No. 1)	Original Issue Date: 3-11-76 Amendment Dates: 5-28-82, 1-13-89, 2-12-98	T	

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
2631-049-4528-O (Power Boiler No. 2; burning of used lubrication oil)	Original Issue Date: 3-11-76 Amendment Dates: 5-28-82, 1-13-89, 7-8-92, 9-1-93, 2-12-98	T	
2361-049-10570 (Lime Kiln Nos. 1 and 2)	Original Issue Date: 8-6-90 Amendment Dates: 10-26-98	T	
2631-049-10342 (Lime Handling System)	Original Issue Date: 12-8-89		T
2631-019-2219-O (Slaker Nos. 1 and 2)	Original Issue Date: 9-19-74		T
2631-049-11580 (Package Boiler Nos. 1, 2 and 3)	Original Issue Date: 4-5-95		T
2631-049-11458 (Used Oil Blended with No. 6 Oil: Recovery Boiler No. 3, Power Boilers Nos. 1 and 2, Lime Kilns Nos. 1 and 2)	Original Issue Date: 9-28-94		T
2631-049-12445 (Woodyard)	Original Issue Date: 6-9-97		T
2631-099-0001-E-01-0 (Cluster Rule upgrade PCP)	Original Issue Date: 3-4-99		T

Table 2: Comments on Specific Permits

Permit Number	Comments
2631-049-10569	Our records show that this permit was amended on September 28, 1994.
2631-049-10570	The facility also listed Permit No. 2631-049-10580 as being issued on 10-26-98. This permit was entered in error by the facility. The permit for the green liquor clarifier and caustic area upgrades is 2631-049-10570. It was issued as an amendment to the permit and is listed as such under permit 2631-049-10570.
2631-049-4527-O	The facility listed that an amendment was issued on 7-9-97. Our records show that this was a letter allowing the facility to burn #2 fuel oil in No.1 and 2 Power Boilers.
2631-049-4528-O	The facility listed that an amendment was issued on 7-9-97. Our records show that this was a letter allowing the facility to burn #2 fuel oil in No.1 and 2 Power Boilers.

D. Process Description

1. SIC Code(s)

Major - 2631
Other - Not Applicable

2. Description of Product(s)

Manufacture of unbleached kraft linerboard and unbleached corrugating medium.

3. Overall Facility Process Description

Woodyard

Logs and purchased chips are received in the woodyard via truck or railcar. The logs can go to one of four circular crane stacks or immediately to a debarking drum. The logs proceed through the debarking drums where the dirt and bark are removed. From this area they proceed to the chipper. The chips are belt conveyed to chip screens for sorting. The acceptable chips are routed via belt conveyors to stacker/reclaimers and to chip storage piles. The oversized chips from the chip screens are sent to another chipper and then air conveyed back to the chip screens. Fines from the chip screens and bark from the debarker are conveyed via belt conveyors to the bark pile to be used for fuel in the power boilers. Purchased chips are conveyed from truck dump stations directly to the stacker/reclaimers and put on chip piles. Purchased bark is received via trucks and it is conveyed to the bark pile via belt conveyors after it is put through a hog.

Kraft Mill

Chips are routed from the chip storage area to the kraft process. The process begins with the charging of the batch digesters with the chips. White liquor and black liquor are added and the batch is cooked. After cooking, the contents are blown to the digester blow tanks and then routed to a series of refiners and screens to remove oversized particles and to thicken the brownstock mixture. The pulp is washed in the brown stock washers to recover residual liquor. The weak black liquor exiting the washers is collected in filtrate tanks, while the washed pulp is pumped to high density storage chests.

Neutral Sulfite Semi-Chemical Pulping

The NSC process begins with the charging of chips from the hardwood chip silo into the NSC chip surge bin. The chips, sodium sulfite and green liquor are added to the continuous digester. After cooking, the contents are blown to the NSC digester blow tank and follow the same type process as the kraft pulp.

Chemical Recovery

Residual black liquor (weak black liquor) is recovered from cooked pulp in the brownstock washing area. The weak black liquor from the process is routed through the Kraft/NSC black liquor filter and then into liquor collection tanks.

The weak black liquor, which is between 12 and 18% solids, is routed through pre-evaporators and then through multiple-effect evaporators to increase the solids content of the liquor to approximately 50 to 55%. The multiple-effect evaporators are a series of evaporators utilizing steam and pressure to increase the solid content of the weak liquor. Steam is supplied by the recovery boilers and the power boiler. Black liquor exiting the evaporators is routed to storage tanks and then to the indirect heat evaporators (concentrators) to further increase the solid content to approximately 60 to 65% (heavy black liquor). Heavy black liquor exiting the concentrators is stored in black liquor storage tanks which supply the No. 3 Recovery Boiler. Overhead gases from the evaporation process are routed to the NCG system.

The black liquor which supplies Recovery Boilers No. 1 and No. 2 is processed similar to that of Recovery Boiler No. 3. The black liquor exiting the shared multiple-effect evaporators, as described above, is routed to a dedicated set of crystallizers serving Recovery Boilers No. 1 and No. 2.

Exhaust gases generated in the black liquor evaporator process (multiple-effect evaporators, concentrators, and crystallizers) are ultimately routed to the NCG system for incineration in the lime kilns.

Heavy black liquor is sprayed into one of three recovery furnaces. The organic material present in the liquor is broken down, the carbon is burned away, and the inorganic compounds are melted. The molten chemicals (smelt) fall to the bottom of the recovery furnace, and run out of a spout into the associated smelt dissolving tanks. Salt cake, reclaimed from two areas (economizer hopper ash and particulate collected by the electrostatic precipitators), is mixed in with the black liquor and re-introduced into the liquor system by black liquor/salt cake mix tanks and the precipitator mix tank. The salt cake/black liquor mixture is either directly routed to the recovery furnace or sent back to one of the concentrators for further processing.

In the smelt dissolving tanks, smelt from the recovery boilers is dissolved in process water from the recausticizing area mud washers (weak wash) and fresh water to form green liquor.

Recausticizing Area

Green liquor exiting the smelt dissolving tanks is routed to a splitter box for distribution into the green liquor clarifiers. At the clarifiers, dregs (settled solids) are removed from the liquor. The clarifier green liquor is then routed to storage tanks, while the dregs are washed and filtered. Filtrate (weak wash) from the dregs wash/filter operation is routed to weak wash storage tanks for re-use in the system by the smelt dissolving tanks.

Green liquor from the green liquor storage tanks and lime (CaO) from the lime silos are fed to the slakers. The green liquor/lime mixture is agitated, heat is produced from the exothermic reaction and slaked lime is produced. After slaking, the mixture is then routed to the causticizers, while the un-reacted solids (grit), removed in the slaker classifiers, are sent to the grits washer.

White liquor exiting the slaker/causticizers is routed to the splitter box for distribution into the white liquor clarifiers. At the clarifiers, the white liquor is clarified to remove lime mud. The clarifier white liquor is routed to storage tanks, while the lime mud is washed, stored and ultimately filtered prior to introduction into the lime kilns. Process water (weak wash) from the mud washers is routed back to the smelt dissolving tanks. The lime exiting the kilns is transported to one of two lime storage silos.

NCG gases collected from the accumulators at the pulp mill area, turpentine decanters, turpentine storage tanks, pre-evaporators, evaporators, concentrators, and crystallizers are combined and combusted in the lime kilns as part of the facility NCG system.

Condensates are collected from the pre-evaporators and the turpentine decanter to meet the requirements of 40 CFR 63 Subpart S. These condensates are treated in a stripper. The overhead gases from the stripper are incinerated along with NCGs from all sources in an incinerator.

Utilities

There are two boilers at the facility. Power Boiler No. 1 and No. 2 can be fired with woodwaste/bark, coal, tire derived fuel (rubber chips), waste oil, No. 6 fuel oil, peanut/pecan hulls, No. 2 fuel oil, and natural gas. Steam generated from the boilers serves the turbines, the digesters, the evaporators, and the machine dryers. The facility is also permitted to operate three natural gas-fired package boilers. These boilers supply backup power when one of the two power boilers is down.

Machine Area

On the No. 1 and 2 paper machines, stock from the high density storage chests is routed through a series of chests, screens and refiners where the stock is diluted, mixed, screened and refined to a uniform consistency. The stock mixture is pumped to the machine chest, the stuff box and then into the machine head box. Chemicals are added during these steps to control retention, size and pH. The wet sheet is pressed and dried. The dried sheet is then further processed/finished on the winder prior to shipment.

On the No. 3 machine, stock from the NSC high density storage chest is routed to the unrefined chest where it is diluted to a certain consistency. Stock is then pumped through the refiners/screens and into the machine chest where the stock is mixed and refined to achieve a uniform consistency. Broke and stock from the recycle plant is introduced into the system at the machine chest. The stock mixture exiting the machine chest is routed to the stuff box and then into the machine head box. During these steps the stock mixture is diluted. The wet sheet from wet end press section of the machine is fed to dryers where moisture is evaporated. The dried sheet is then further processed/finished on the winder prior to shipment.

4. Overall Process Flow Diagram (optional)

See Title V application.

E. Regulatory Status**1. PSD/NSR**

This is a PSD facility; however, some limits have been taken to avoid PSD on certain modifications. They are as follows:

Lime Handling System is limited to 11.7 pounds per hour of particulate matter.

Power Boilers may only burn 5000 pounds per hour and 60 tons per day of TDF.

Each Package Boiler is limited to 1560 hours of operation per year at the maximum design rate. The package boilers are limited to a total of 471.5×10^6 SCF of natural gas.

The package boilers can operate only when another boiler of equal or larger capacity is shutdown.

Recovery Boiler 3, Power Boilers 1 and 2, and Lime Kilns 1 and 2 are limited to 1,400,000 gallons of used oil.

Incinerator/scrubber system is limited to 25 pounds per hour for nitrogen oxide, 9.0 pounds per hour for sulfur dioxide, PM_{10} , and VOC.

The incinerator (R425) is limited to the following fuels: natural gas, propane, and methanol.

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		
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 Pollutant from the Pulp and Paper Industry.

4. Program Applicability

Indicate if the following programs are applicable to the facility (with a "yes" or "no").

Program Code	Applicable (Yes/No)
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

None Applicable

B. Applicable Rules and Regulations

The facility burns specification used oil for energy recovery, therefore, it is subject to 40 CFR 279 - "Standard for the Management of Used Oil."

C. Compliance Status

The facility has indicated compliance for the entire facility.

D. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario.

E. Permit Conditions

The conditions regarding used oil are listed in section 3 of the permit under Fuel Oil.

III. Regulated Equipment Requirements

A. Brief Process Description

See Section I. D. 3. - Process Description.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
L600	Lime Kiln No. 1	40 CFR 52.21, 40 CFR 279, 391-3-1-.02(2)(gg)1(iv), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.3.15, 3.3.16, 3.4.1 through 3.4.4, 4.2.1, 4.2.2, 5.2.1, 6.2.1, 6.2.2, 6.2.7, 6.2.8, 6.2.9*	C600	Venturi Scrubber
L601	Lime Kiln No. 2	40 CFR 52.21, 40 CFR 279, 391-3-1-.02(2)(gg)1(iv), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.3.15, 3.3.16, 3.4.1 through 3.4.4, 4.2.1, 4.2.2, 5.2.1, 6.2.1, 6.2.2, 6.2.7, 6.2.8, 6.2.9*	C601	Venturi Scrubber
LEG2	Lime Handling System	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.5, 3.4.6*	C636	Venturi Scrubber
R400	Recovery Boiler No. 1	40 CFR 52.21, 40 CFR 60 Subpart BB, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(gg)	3.3.3 through 3.3.6, 3.4.7, 4.2.1, 4.2.2, 4.2.8, 5.2.1, 5.2.3, 5.2.4, 6.2.3, 6.2.6*	C400	electrostatic precipitator

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
R401	Recovery Boiler No. 2	40 CFR 52.21, 40 CFR 60 Subpart BB, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(gg)	3.3.3 through 3.3.6, 3.4.7, 4.2.1, 4.2.2, 4.2.8, 5.2.1, 5.2.3, 5.2.4, 6.2.3, 6.2.6*	C401	electrostatic precipitator
R402	Recovery Boiler No. 3	40 CFR 279, 391-3-1-.02(2)(gg)1(i), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.15, 3.3.16, 3.4.8 through 3.4.12, 4.2.1, 4.2.2, 5.2.1, 5.2.3, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10*	C402	electrostatic precipitator
R404	Smelt Tank No. 1	40 CFR 52.21, 40 CFR 60 Subpart BB, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(gg)	3.3.7, 3.4.13, 3.4.14, 4.2.1, 4.2.2*	C404	Water Shower Scrubber
R405	Smelt Tank No. 2	40 CFR 52.21, 40 CFR 60 Subpart BB, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(gg)	3.3.7, 3.4.13, 3.4.14, 4.2.1, 4.2.2*	C405	Water Shower Scrubber
R406	Smelt Tank No. 3	391-3-1-.02(2)(gg)1(iii), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.15 through 3.4.17, 4.2.1, 4.2.2*	C406	Venturri Scrubber
U500	Power Boiler No.1	40 CFR Subpart 61 Subpart E, 40 CFR 279, 391-3-1-.02(2)(b), 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.8 through 3.3.10, 3.3.15, 3.3.16, 3.4.18 through 3.4.21, 4.2.1, 4.2.2, 4.2.7, 5.2.3, 6.2.4, 6.2.7, 6.2.8*	U500, C500	Multicyclone, Venturri Scrubber
U501	Power Boiler No.2	40 CFR Subpart 61 Subpart E, 40 CFR 279, 391-3-1-.02(2)(b), 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.8 through 3.3.10, 3.3.15, 3.3.16, 3.4.18 through 3.4.21, 4.2.1, 4.2.2, 4.2.7, 5.2.3, 6.2.4, 6.2.7, 6.2.8*	U501, C501	Multicyclone, Venturri Scrubber
U502	Package Boiler No.1	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.11 through 3.3.14, 3.4.22, 3.4.23, 6.2.5*	none	none
U503	Package Boiler No. 2	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.11 through 3.3.14, 3.4.22, 3.4.23, 6.2.5*	none	none
U504	Package Boiler No. 3	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.11 through 3.3.14, 3.4.22, 3.4.23, 6.2.5*	none	none
COND	Process Condensates	40 CFR 63 Subpart S	3.3.25 through 3.3.29, 4.2.4, 4.2.6*	R425	Condensate Stripper, Incinerator/ Packed Bed Scrubber
R424 R426	Foul Condensate Stripper and Tank	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 40 CFR 60 Subpart Kb	3.3.21, 3.3.22, 3.3.25, 3.3.27, 3.3.28, 3.3.30, 4.2.4, 4.2.6, 5.2.2, 5.2.5 through 5.2.7*	R425	Incinerator
R425	NCG/SOG Incinerator/Scrubber	40 CFR 63 Subpart S, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(gg)	3.3.17 through 3.3.19, 3.4.24 through 3.4.29, 4.2.3 through 4.2.6, 5.2.2, 5.2.5 through 5.2.7, 6.2.11*	R425	Packed Bed Scrubber

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
DGS1	Digester System (12 Digesters)	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 391-3-1-.02(2)(gg)	3.3.25, 3.3.27, 3.3.28, 3.4.29*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Scrubber
EVS1	Multiple-Effect Evaporator System	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 391-3-1-.02(2)(gg)	3.3.25, 3.3.27, 3.3.28, 3.4.29*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Scrubber
TRS1	Turpentine Recovery System	40 CFR 63 Subpart S	3.3.25, 3.3.27, 3.3.28*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Scrubber
WEG1	Woodyard Area Chip and Fines Transfer	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(n)	3.4.30 through 3.4.33, 6.2.13*	none	none
POG1	Digester Chip Filling, Brownstock Washers, Foam Tanks, White/Black Liquor Measuring Tanks	none	none*	none	none
SOG1	NSSC Blow Tank, Brownstock Washers, Filtrate Tanks, Spent Liquor Tank	none	none*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Scrubber
R427 R428	Black Liquor Tank Nos. 4 and 5	40 CFR 60 Subpart Kb	3.3.30*	none	none
REG1	Black Liquor Tanks and Associated Black Liquor Process Tanks	none	none*	none	none
LOG1	Splitter Boxes, Mud Washers, Mud Storage Tanks, Mud Filter Vacuum Pump Exhausts	none	none*	none	none
LEG1	Slakers (No. 1 and No. 2)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.34, 3.4.35*	C614 C615	Water Shower Scrubber
MOG1	Paper Machines	none	none*	none	none
MEG1	Stock Storage Chests	none	none*	none	none
WWT1	Wastewater Treatment System	none	none*	none	none
OEG1	Fuel Storage Tanks	none	none*	none	none

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

Lime Kilns 1 and 2 are subject to the following rules and regulations:

- 40 CFR 52.21 - Prevention of Significant Deterioration
- 40 CFR 279 - Standard for the Management of Used Oil
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Process
- Georgia Rule 391-3-1-.02(2)(g) - Sulfur Dioxide

Lime Handling System

- 40 CFR 52.21 Avoidance - Prevention of Significant Deterioration
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Process

Recovery Boilers 1 and 2 are subject to the following rules and regulations:

- 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills
- 40 CFR 52.21 - Prevention of Significant Deterioration
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions (Subsumed by more stringent PSD limit)
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Processes
- Georgia Rule 391-3-1-.02(2)(g) - Sulphur Dioxide (Subsumed by 40 CFR 60 Subpart Db)
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills (Subsumed by more stringent TRS PSD limit)

Recovery Boiler 3 is subject to the following rules and regulations:

- 40 CFR 279 - Standard for the Management of Used Oil
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Processes
- Georgia Rule 391-3-1-.02(2)(g) - Sulfur Dioxide
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills

Smelt Tanks 1 and 2 are subject to the following rules and regulations:

- 40 CFR 52.21 - Prevention of Significant Deterioration
- 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills (Subsumed by more stringent PSD limit)
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Processes
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills (Subsumed by more stringent PSD limit)

Smelt Tank 3 is subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Processes

Power Boilers 1 and 2 are subject to the following rules and regulations:

- 40 CFR 52.21 Avoidance - Prevention of Significant Deterioration
- 40 CFR 61 Subpart E - National Emission Standards for Mercury
- 40 CFR 279 - Standard for the Management of Used Oil
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(d) - Fuel-burning Equipment
- Georgia Rule 391-3-1-.02(2)(g) - Sulphur Dioxide

Package Boilers 1, 2 and 3 are subject to the following rules and regulations:

- 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR 52.21 Avoidance - Prevention of Significant Deterioration
- Georgia Rule 391-3-1-.02(2)(d) - Fuel-burning Equipment
- Georgia Rule 391-3-1-.02(2)(g) - Sulfur Dioxide (Inherently comply because the facility only burns natural gas in the package boilers)

Process Condensates

- 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Foul Condensate Stripper and Tank

- 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
- 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills
- 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

Incinerator/Scrubber System is subject to the following rules and regulations:

- 40 CFR 52.21 Avoidance - Prevention of Significant Deterioration
- 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
- Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e) - Particulate Emissions from Manufacturing Processes
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills

Digester System and Evaporator System

- 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
- 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills
- Georgia Rule 391-3-1-.02(2)(gg) - Kraft Pulp Mills

Turpentine Recovery System

- 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Black Liquor Tank Nos. 4 and 5

40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

Equipment Group WEG1 is subject to the following rules and regulations:

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

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

Georgia Rule 391-3-1-.02(2)(n)- Fugitive Dust

Equipment Group LEG1 is subject to the following rules and regulations:

40 CFR 52.21 - Prevention of Significant Deterioration

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

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

Slakers (Nos. 1 and 2) are each controlled by a wet shower scrubber. The control equipment was required as part of PSD permit 2631-049-10570, thereby, making Equipment Group LEG1 subject to 40 CFR 52.21.

Wastewater Treatment System WWT1, Equipment Groups REG1, MEG1, OEG1 and Operations Groups POG1, SOG1, LOG1, MOG1 are listed in the equipment list due to emissions. The emissions of each group are greater than insignificant level, however, there are no applicable rules or regulations.

D. Compliance Status

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

E. Operational Flexibility

Not Applicable

F. Permit Conditions

Equipment Federal Rule Standards

Lime Kilns 1 and 2

Permit condition 3.3.1(a) limits particulate matter emissions to 20 pounds per hour from each lime kiln. This is a PSD limit (40 CFR 52.21) from permit number 2631-049-10570 condition 5.(b). No change was requested by the facility for this condition.

Permit condition 3.3.1(b) limits sulfur dioxide emissions to 113 pounds per hour from each lime kiln. This PSD limit (40 CFR 52.21) from permit number 2631-049-10296 condition 7. No change was requested by the facility for this condition.

The Lime Kilns were constructed prior to September 24, 1976, therefore, they are not subject to 40 CFR 60 Subpart BB - "Standards of Performance for Kraft Pulp Mills." The lime kilns do, however, combust NCC gases from the digester and evaporator systems which are both subject to 40 CFR 60 Subpart BB. In accordance with 40 CFR 60.283(a)(1)(iii), the lime kilns must maintain a minimum temperature of 1200 EF for at least 0.5 second. The normal operating temperature of the lime kilns is well above the 1200 EF requirement, therefore, no conditions were added to the permit concerning lime kiln temperature requirements.

Lime Handling System

Permit condition 3.3.2 limits particulate matter emissions from the lime handling system to 11.7 pounds per hour. This is a PSD avoidance limit (40 CFR 52.21) from permit number 2631-049-10342. No change was requested by the facility for this condition.

Recovery Boilers 1 and 2

Permit condition 3.3.3 limits the annual capacity factor for oil fired in each boiler to 10 percent or less. This is a 40 CFR 60 Subpart Db avoidance for nitrogen oxide from permit number 2631-049-10296 condition 38. No change was requested by the facility for this condition.

Permit condition 3.3.4 limits the fuel burned in each boiler to "very low sulfur oil." This limit is from 40 CFR 60 Subpart Db. It is from permit number 2631-049-10296 condition 8. No change was requested by the facility for this condition.

Permit condition 3.3.5(a-b) limits particulate matter emissions from each boiler to 46.0 pounds per hour and 0.030 gr/dscf corrected to 8 percent oxygen. This is a PSD limit from permit number 2631-049-10296 condition 5(b). No change was requested by the facility to this condition.

Permit condition 3.3.5(c-d) limits the emissions of sulfur dioxide from the boilers to 535 pounds per hour and 300 ppm on a dry basis corrected to 8 percent oxygen on a 3-hour basis. This is a PSD limit from permit number 2631-049-10296 condition 5(c). No change was requested by the facility for this condition.

Permit condition 3.3.5(e-f) limits the emissions of nitrogen oxides from the boilers to 154 pounds per hour and 0.20 pounds per million BTU heat input. This is a PSD limit from permit number 2631-049-10296 condition 5(d). The facility has requested that the 0.20 pounds per million BTU heat input requirement be deleted. This is part of the BACT analysis and as such will remain in the permit as is.

Permit condition 3.3.5(g-h) limits the emissions of carbon monoxide from the boilers to 480 pounds per hour and 11 pounds per ton of air dried pulp. This is a PSD limit from permit number 2631-049-10296 condition 5(e). The facility has requested the 11 pounds per ton of air dried pulp requirement be deleted. This was part of the BACT determination and as such will remain in the permit as is.

Permit condition 3.3.5(i-j) limits the emissions of total reduced sulfur from the boilers to 4.74 pounds per hour and 5 ppm on a dry basis corrected to 8 percent oxygen on a 12 hour basis. This is a PSD/40 CFR 60 Subpart BB limit from permit number 2631-049-10296 condition 5(f). No change was requested by the facility for this condition. The recovery boilers are also subject to the TRS limit from 391-3-1-.02(2)(gg) - "Kraft Pulp Mills." The PSD/40 CFR 60 Subpart BB limits are more stringent, therefore, Georgia Rule 391-3-1-.02(2)(gg) is subsumed.

Permit condition 3.3.6 limits the opacity from each boiler to 20 percent. This is a PSD limit from permit number 2631-049-10296 condition 5(a). No change was requested by the facility to this condition. Georgia Rule 391-1-3-.02(b) is also applicable to the Recovery Boilers, however, the PSD limit is more stringent and it is therefore the limit listed in the permit.

Smelt Tanks 1 and 2

Permit condition 3.3.7(a-b) limits the emissions of particulate matter from these emissions units to 7.6 pounds per hour and 0.12 pounds per ton of black liquor solids. This is a PSD limit from permit number 2631-049-10296 condition 6(a). No change was requested by the facility for this condition.

Permit condition 3.3.7(c-d) limits the emissions of sulfur dioxide from the smelt tanks to 5.5 pounds per hour and 25 ppm on a dry basis corrected to 8 percent oxygen. This is a PSD limit from permit number 2631-049-10296 condition 6(b). The facility has requested the removal of the 25 ppm requirement. This was part of the PSD determination and as such will not be removed from the permit.

Permit condition 3.3.7(e-f) limits the emissions from the tanks for total reduced sulfur to 1.05 pounds per hour and 0.0168 pound per ton of black liquor solids. This is a PSD limit from permit number 2631-049-10296 condition 6(c). No change was requested by the facility for this condition.

The smelt tanks are also subject to total reduced sulfur limits from 391-3-1-.02(2)(gg) - "Kraft Pulp Mills," and 40 CFR 63 Subpart BB - "Standards of Performance for Kraft Pulp Mills," however, these regulations are subsumed by the more stringent PSD limit.

Power Boilers 1 and 2

Permit condition 3.3.8 subjects the boilers to the requirements of 40 CFR 61 Subpart E - National Emission Standard for Mercury. This limit is from permit number 2631-049-4527-O condition 13 and permit number 2631-049-4528-O condition 13. This limit was included because these particular boilers are permitted to burn primary clarifier sludge. No change was requested by the facility for this condition.

Permit condition 3.3.9 limits the emissions of mercury from the boilers to 3200 grams per 24-hour period. This is from 40 CFR 61.52(b) and was not in a permit. It is being included in this permit for further clarification of the applicable requirements.

Permit condition 3.3.10 specifies that no more than 5,000 pounds per hour and 60 tons per day of TDF may be burned in Power Boiler 1 or 2. This limit is for each boiler, not a combination of both boilers. This was requested by the facility in a letter dated July 8, 1992 and was part of permit number 2631-049-4527-O condition 8 and permit number 2631-049-4528-O condition 8. This is a PSD avoidance limit. No change was requested by the facility for this condition.

Package Boilers 1, 2 and 3

Permit condition 3.3.11 subjects the boilers to 40 CFR 60 Subpart Dc - National Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. It is from permit number 2631-049-11580 condition 2. No change was requested by the facility for this condition.

Permit condition 3.3.12 limits the hours of operation of each package boiler to 1560 hour per year at the maximum design rates. This is a PSD avoidance limit from permit number 2631-049-11580 condition 3. No change was requested by the facility for this condition.

Permit condition 3.3.13 limits the total amount of natural gas consumed in the boilers to 471.5×10^6 SCF per year. This is a PSD avoidance limit from permit number 2631-049-11580 condition 4. No change was requested by the facility for this condition.

Permit Condition 3.3.14 specifies that the package boilers may be operated only when one of the other boilers of equal or larger capacity is shutdown. This was part of the agreement in application number 7339 dated February 3, 1995 to avoid a PSD review and it was included in permit number 2631-049-11580 condition 10. No change was requested by the facility for this condition.

Fuel Oil

Permit condition 3.3.15 specifies the requirements for used oil burned at the facility. The allowables come from 40 CFR 279.11 and permit number 2631-049-11458 condition 1. No change was requested by the facility for this condition.

Permit condition 3.3.16 limits the total amount of used oil burned in Recovery Boiler 3, Power Boilers 1 and 2 and Lime Kilns 1 and 2 to 1,400,000 gallons per year. This is a PSD avoidance limit from permit number 2631-049-11458 condition 2. No change was requested by the facility for this condition.

Incinerator/Scrubber System (Cluster Rule)

Permit condition 3.3.17 (a) limits the emissions of nitrogen oxides from the incinerator/scrubber system to pounds per hour. This is a PSD avoidance limit from permit number 2631-099-0001-E-01-0 condition 2.1(a). No change was requested by the facility for this condition.

Permit condition 3.3.17 (b) limits the emissions of sulfur dioxides from the incinerator/scrubber system to pounds per hour. This is a PSD avoidance limit from permit number 2631-099-0001-E-01-0 condition 2.1(b). No change was requested by the facility for this condition.

Permit condition 3.3.17 (c) limits the emissions of particulate matter from the incinerator/scrubber system to 9.0 pounds per hour. This is a PSD avoidance limit from permit number 2631-099-0001-E-01-0 condition 2.1(c). No change was requested by the facility for this condition.

Permit condition 3.3.17 (d) limits the emissions of VOC as methanol from the incinerator/scrubber system to 9.0 pounds per hour. This is a PSD avoidance limit from permit number 2631-099-0001-E-01-0 condition 2.1(d). No change was requested by the facility for this condition.

Permit condition 3.3.18 requires a minimum temperature be maintained in the incinerator (Source Code R425) in accordance with 40 CFR 63.443. This is from permit number 2631-099-0001-E-01-0 condition 3.3. No change was requested by the facility for this condition.

Permit condition 3.3.19 specifies that only natural gas, propane, methanol, NCGs, or SOGs may be burned in the incinerator. This was included as part of application number 10866 date September 1, 1998 to avoid PSD review and was part of permit number 2631-099-0001-E-01-0 condition 3.2. The facility requested that NCGs and SOGs be listed as fuels for the incinerator.

The incinerator/scrubber system is also subject to 391-3-1-.02(2)(gg) - "Kraft Pulp Mills," and 40 CFR 63 Subpart S - "National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry," however, these regulations are subsumed by the more stringent PSD avoidance limits from permit number 2631-099-0001-E-01-0

Cluster Rule

Permit conditions 3.3.20 through 3.3.29 detail the requirements of 40 CFR 63 Subpart S - National Emission Standards of Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule). The facility has elected to control the HAPs from each LVHC system (digester, turpentine recovery, evaporator, steam stripper systems, and any other equipment serving the same function) in the kraft pulp mill and the neutral-sulfite semi-chemical mill utilizing both lime kilns and the steam stripper in association with the incinerator/scrubber system. Process condensates are stripped and emissions are controlled by the incinerator/scrubber system. Since the mill is an unbleached process the requirements are 7.2 pound per ton oven dried pulp (ODP) for collection and 6.6 pounds per ton ODP for treatment measured as methanol. They have also chosen to reduce the total HAP emissions by 98% or more by weight as their compliance demonstration limit. The facility shall be in compliance with the LVHC limits no later than April 16, 2001 the equipment as specified in 40 CFR 63.443(a)(1)(ii) through (v) (pulp washing, knotter, screen, decker, and oxygen delignification systems, weak liquor storage tanks, and any other equipment serving the same function) no later than April 17, 2006. These are new requirements and have not been included in any other permit.

Tanks

Permit condition 3.3.30 subjects the foul condensate stripper tank, and Black Liquor Tank Nos. 4 and 5 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." The facility must keep records showing the dimension of the storage vessels and an analysis showing the capacity of each storage vessel. This is a new requirement.

General

Conditions 3.3.31 and 3.3.32 subject the facility to the "General Provisions" required by Subpart A of 40 CFR 60 and 40 CFR 63.

Equipment SIP Rule Standards*Lime Kilns 1 and 2*

Permit condition 3.4.1 limits the emissions of TRS from the kilns to 40 ppm per 24-hours on a dry basis corrected to 10 percent oxygen. This is a requirement of Georgia Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills" and was included in permit number 2631-049-10570 condition 5(c). No change was requested by the facility for this condition.

Permit condition 3.4.2 limits the opacity from each kiln to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was included in permit number 2631-049-10570 condition 5(a). No change was requested by the facility for this condition.

Permit condition 3.4.3 limits the particulate matter emissions from each kiln to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This condition was not previously listed in the Lime Kiln permit.

Permit condition 3.4.4 limits the sulfur content of the fuel to be burned in the lime kilns to 3 percent. This requirement of Georgia Rule 391-3-1-.02(2)(g) - "Sulfur Dioxide." This condition was not previously listed in a permit.

Lime Handling System

Permit condition 3.4.5 limits the opacity from the lime handling system to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was not previously included in a permit.

Permit condition 3.4.6 limits the particulate matter emissions from the lime handling system to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This condition was not previously listed in a permit.

Recovery Boilers 1 and 2

Permit condition 3.4.7 limits the particulate matter emissions from the boilers to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This was included in permit number 2631-049-10296 condition 5(b). No change was requested by the facility for this condition.

Recovery Boiler 3

Permit condition 3.4.8 limits the emissions of TRS from Recovery Boiler 3 to 20 ppm on a dry basis and as a 24-hour average, corrected to 8 percent oxygen. This is a requirement of Georgia Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills" and was included in permit number 2631-049-10569 condition 5(c). No change was requested by the facility for this condition.

Permit condition 3.4.9 limits the opacity from Recovery Boiler 3 to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was included in permit number 2631-049-10569 condition 5(a). No change was requested by the facility for this condition.

Permit condition 3.4.10 limits the particulate matter emissions from the boiler to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This was included in permit number 2631-049-10569 condition 5(b). No change was requested by the facility for this condition.

Permit condition 3.4.11 limits the sulfur content of the fuel to be burned in Recovery Boiler 3 to 3 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(g) - "Sulfur Dioxide." This condition was not previously listed in a permit.

Permit condition 3.4.12 limits the amount of sulfur dioxide that may be emitted from Recovery Boiler 3 to than 0.8 pounds of sulfur dioxide per million BTU's of heat input derived from liquid fossil fuel or derived from liquid fossil fuel. This condition was not previously listed in a permit.

Smelt Tanks 1 and 2

Permit condition 3.4.13 limits the opacity from the each smelt tank to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was not previously included in a permit.

Permit condition 3.4.14 limits the particulate matter emissions from each smelt tank to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This condition was not previously listed in a permit.

Smelt Tank 3

Permit condition 3.4.15 limits the emissions of TRS from Smelt Tank 3 to 40 ppm per 24-hours on a dry basis corrected to 10 percent oxygen. This is a requirement of Georgia Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills" and was included in permit number 2631-049-10569 condition 6(c). No change was requested by the facility for this condition.

Permit condition 3.4.16 limits the opacity from Smelt Tank 3 to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was included in permit number 2631-049-10569 condition 6(a). No change was requested by the facility for this condition.

Permit condition 3.4.17 limits the particulate matter emissions from Smelt Tank 3 to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This was included in permit number 2631-049-10569 condition 6(b). No change was requested by the facility for this condition.

Power Boilers 1 and 2

Permit condition 3.4.18 limits the amount of primary clarifier sludge fired in the boilers to 900 tons per day. Permit number 2631-049-4527-O condition 12 and permit number 2631-049-4528-O condition 18 stated that the facility could fire primary clarifier sludge at rates determined by the most recent emissions test. Please see section "Conditions Removed from the Permit" for further discussion. The referenced regulation for this requirement is Georgia Rule 391-3-1-.02(2)(a)10 - "General Provisions."

Permit condition 3.4.19 limits the opacity from each boiler to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions." This condition was not previously listed in a permit.

Permit condition 3.4.20 limits the particulate emissions from Power Boilers 1 and 2 as specified in Georgia Rule 391-3-1-.02(2)(d). The equipment listed is limited to the following allowable emission rate : $P=0.7(10/R)^{0.202}$ where P equals the allowable weight of emissions rate in pounds per million BTU heat input and R equals heat input of fuel-burning equipment in million BTU per hour. Power Boiler #1 was installed 1963 and Power Boiler #2 was installed in 1967. Each boiler has a heat input capacity of 784 million BTU/hr. This condition was not previously listed in a permit.

Permit condition 3.4.21 limits the sulfur content of the fuel to be burned in the power boilers to 3 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(g) - "Sulfur Dioxide." This condition was not previously listed in a permit.

Package Boilers 1,2, and 3

Permit conditions 3.4.22 and 3.4.23 limit the particulate matter emissions and opacity from each package boiler as specified in Georgia Rule 391-3-1-.02(2)(d). The equipment listed is limited to the following allowable emission rate : $P=0.5(10/R)^{0.5}$ where P equals the allowable weight of emissions rate in pounds per million BTU heat input and R equals heat input of fuel-burning equipment in million BTU per hour. Permit condition 3.4.23 limits each package boiler to an opacity of no more than twenty percent except for one six minute period per hour of no more than twenty seven percent. These conditions were not previously listed in a permit.

Incinerator/ Scrubber System

Permit condition 3.4.24 requires the scrubber to operating at all times when operating the incinerator. The referenced regulation for this requirement is Georgia Rule 391-3-1-.02(2)(a)10 - "General Provisions" and was included in permit number 2631-099-0001-E-01-0 condition 3.4. No change was requested by the facility for this condition.

Permit condition 3.4.25 requires the lime kilns to be used as backup for the NCG stream only should the incinerator/scrubber system malfunction or is down. The referenced regulation for this requirement is Georgia Rule 391-3-1-.02(2)(a)10 - "General Provisions" and was included in permit number 2631-099-0001-E-01-0 condition 3.6. No change was requested by the facility for this condition.

Permit condition 3.4.26 requires the facility to maintain a minimum temperature of 1200 EF in the incinerator for at least 0.5 second. The referenced regulation for this requirement is Georgia Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills."

Permit condition 3.4.27 limits the opacity from the incinerator/scrubber system to 40 percent. This is a requirement of Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and was not previously included in a permit.

Permit condition 3.4.28 limits the particulate matter emissions to the allowable rates as determined by Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes." This was not previously included in a permit.

Digester System and Multiple-Effect Evaporator System

Permit condition 3.4.29 specifies TRS emissions limits from the Digester System and Multiple-Effect Evaporator System. The facility primarily combusts the TRS gases from these two systems in equipment that is not subject to 391-3-1-.02(2)(gg), therefore, they must be combusted with other gases in an incinerator or other device, or combusted in a lime kiln or recovery boiler not subject to the provisions of Georgia State Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills," and are subjected to a minimum temperature of 1200 EF for at least 0.5 second. This is a requirement of Georgia Rule 391-3-1-.02(2)(gg) - "Kraft Pulp Mills." This condition was not previously listed in a permit.

Woodyard Area Chip and Fines Transfer

Permit conditions 3.4.30 through 3.4.33 subject equipment group WEG1 (Woodyard and Fines Transfer area) to Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes," Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions," and Georgia Rule 391-3-1-.02(2)(n) - "Fugitive Dust."

The Woodyard Area Chip and Fines Transfer Equipment Group (WEG1) has potential emissions of 74.09 tpy PM, 175.68 tpy of VOC, and 20.60 tpy PM₁₀. The equipment group includes the following point source exhausts and is therefore subject to Georgia Rules 391-3-1-.02(2)(e) and 391-3-1-.02(2)(b): Hardwood Rechipper Cyclone (W009), NSC Chip Silo Cyclone (W003), No.1 CTS System ADS Chip Cyclone (W007), No 2 CTS System ADS Chip Cyclone (W008), CTS Fines Conveying Cyclone (W002), Rejects Chipper No. 1 Cyclone (W136), Rejects Chipper No. 2 Cyclone (W137), and Rail Car Chip Loadout Cyclone (WG19).

Slakers

Permit conditions 3.4.34 and 3.4.35 subject equipment group LEG1 (Slakers) to Georgia Rule 391-3-1-.02(2)(b) - "Visible Emissions" and 391-3-1-.02(2)(e) - "Particulate Emissions from Manufacturing Processes."

Equipment Standards Not Covered by a Federal or SIP Rule

None Applicable

Conditions Removed from the Permit

Conditions (3) and (6)9 of permit numbers 2631-049-4527-O and 2631-049-4528-O have been removed as requested by the facility. These conditions required an opacity reading of light, normal or heavy from the Power Boilers. Since the facility monitors and records the venturi scrubber flow rate and pressure drop, such readings are unnecessary as the continuous monitoring of the two parameters is an acceptable surrogate. Also, removed from condition 6 are items 2, 6, 7 and 8. These parameters are only to be measured during stack testing and, therefore, are listed in the test plan.

In addition, condition 10 of Permit No. 2631-049-12445 was removed from the permit. The facility was required to keep monthly records of each raw material received, bark generated, and softwood and hardwood chips sent to the digesters. This condition was removed due to lack of regulatory justification.

Permit number 2631-049-4527-O conditions 11 and 12 and permit number 2631-049-4528-O conditions 17 and 18 were not included in the permit. These conditions were in the permits due to applicability to 40 CFR 61 Subpart E - "National Emissions Standard for Mercury." Subpart E requires that the facility not emit more than 3200 grams of mercury per 24-hour period as specified in Condition 3.3.9. The rule also requires that if a source emits more than 1600 grams of mercury per day, then the facility shall perform monitoring by periodic testing. The removed conditions limited the sludge firing rate to the rate as determined by the most recent emissions test.

The most recent emissions test was conducted on September 8-12, 1997. The test was conducted while firing 3 dry tons of sludge per hour which resulted in mercury emissions of 5.0 grams/day, thus yielding a maximum firing rate of 1901 ton/hr to comply with the standard. The facility is limited to a firing rate of 9 ton/day as indicated in Condition 3.4.18. At a firing rate of 900 ton/day the facility has the potential to emit 1500 g/day of mercury. The Division therefore concludes that it is very unlikely to fire 900 ton/day of sludge. Due to the stated reasons, no monitoring or recordkeeping requirements are listed in the permit to comply with 40 CFR 61 Subpart E - "National Emissions Standard for Mercury."

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

A. General Testing Requirements

This Permit specifies that a performance test may be required at any time upon request by EPD to determine compliance with emissions limits contained in section 2.0 and 3.0. The permit does specify in condition 4. the applicable test method which would apply. A general condition to require test notification of any test and for the submission of a test plan is included.

Condition 4.1.1 was modified to require that test results be submitted to the Division within 45 days of the completion of the testing. The change was implemented due to the type and frequency of testing required by the permit. The template modification was reviewed and approved by the compliance and monitoring programs.

Condition 4.1.4 states that the Division may require that the source be tested for compliance at a higher production rate, should production rates increase above the rates at which the acceptable performance tests were made.

B. Specific Testing Requirements

Condition 4.2.1 lists the required test associated with the specific equipment (see below):

Equipment	Pollutants
Lime Kiln 1 and 2	Particulate Matter
Recovery Boilers 1, 2 and 3	Particulate Matter

Equipment	Pollutants
Smelt Tanks 1, 2 and 3	Particulate Matter Total Reduced Sulfur
Power Boilers 1 and 2	Particulate Matter

This was not changed from previous permits.

Condition 4.2.2 details the testing frequency. The baseline testing frequency is unchanged from previous permits, however, if the facility's test results are greater than 85 percent of the allowable then the facility must increase the frequency of testing until an acceptable performance test is completed. For annual testing, the facility must complete two consecutive tests less than or equal to 85 percent of the allowable before being able to skip the next scheduled performance test.

Also, if the test results are less than or equal to 50 percent of the allowable, the annual testing is relaxed to biennial and the biennial testing will remain unchanged. This is a change from previous permits and is being used to standardize the testing frequency among pulp and paper production facilities in Georgia.

Condition 4.2.2 also provides that data from these tests will be used to establish the operational parameters as specified in 6.1.7c. The condition allows that previously approved performance tests which demonstrate compliance may also be used during the 5 years prior to the most recent performance test or the life of the permit, whichever is shorter.

Condition 4.2.3 requires an initial performance test for the incinerator/scrubber system for NO_x, PM, SO₂ and VOC. This is part of the PSD review for permit number 2631-099-0001-E-01-0 condition 4.5.

Conditions 4.2.4 and 4.2.5 detail the testing requirements for demonstrating compliance with the Cluster Rule. These are new requirements.

Condition 4.2.6 further details the requirements for Cluster Rule testing for the validation of the averaging to be used in the initial performance test for this mill. This is a new requirement.

Condition 4.2.7 details the requirements for Power Boilers 1 and 2 concerning mercury emissions testing.

Condition 4.2.8 details NO_x testing requirements for Recovery Boilers 1 and 2. These tests will establish an acceptable black liquor nitrogen content to provide compliance with limits specified in condition 3.3.5.

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

A. General Monitoring Requirements

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so

downtime is minimized. All data should also be recorded during any calibration activity to help verify that calibration was performed and completed properly.

B. Specific Monitoring Requirements

1. Individual Equipment:

a. Specific monitoring requirements

Lime Kilns

The Permittee continuously monitors TRS and oxygen for Lime Kilns 1 and 2 in order to calculate and record daily 24-hr averages corrected to 10% oxygen as is required by 391-3-1-.02(2)(gg) and 391-3-1-.02(6)(a). Pressure drop and scrubbant flow rate are monitored for the Lime Kiln scrubbers to ensure proper equipment operation. The proper operation of the scrubbers provide a reasonable assurance of compliance with particulate matter emissions and sulfur dioxide limits specified in 3.3.1, and opacity limits specified in 3.4.2.

The following table provides the data to support the numerical ranges used to provide a reasonable assurance of compliance with emission limitations. The numerical parameter established is 90% of the minimum value of all tests reviewed for that particular parameter.

Emission Unit	Scrubbant Flow	Differential Pressure	% Allowable	Data Source
Lime Kiln #1	560	19.4	7/27/99 - 75.9 8/22/00 - 48.7	Last 2 PM stack tests since new permit limits were accepted.
Lime Kiln #2	560	19.9	1/11/00 - 46.0 9/12/00 - 55.3	Last 2 PM stack tests since new permit limits were accepted.

Opacity readings from the last three compliance inspections conducted by Alicia Stephens are as follows:

Emission Unit	6/6/00	1/11/00	8/17/99	2/24/99
Lime Kiln #1	10 %	10 %	10 %	10 %
Lime Kiln #2	10 %	10 %	10 %	10 %

Lime Handling System

Pressure drop and scrubbant flow rate are monitored for the Lime Handling System scrubber to ensure proper equipment operation. The proper operation of the scrubber provides a reasonable assurance of compliance with particulate matter emissions and opacity limits specified in 3.3.2 and 3.4.5, respectively. Opacity readings from the last three compliance inspections on 6/6/00, 1/11/00 and 8/17/99 conducted by Alicia Stephens show opacity readings of <5% for the Lime Handling System. The numerical parameters established are based on normal operating conditions of the scrubber.

Recovery Boilers

The Permittee continuously monitors TRS and oxygen for Recovery Boilers 1 and 2 in order to calculate and record each 24-hr average corrected to 8% oxygen as required under 391-3-1-.02(6)(a). These boilers also have continuous opacity monitors and CEMs for sulfur dioxide. The opacity monitor is used to provide reasonable assurance of compliance with opacity regulations while the sulfur dioxide CEM is used to provide assurance that the three hour rolling average of sulfur dioxide is below that required by 40 CFR 42.6 and 40 CFR 60.45b(j). The facility must maintain annual capacity records for both boilers to assure compliance with Condition 3.3.3. Records of the black liquor firing rate and the percent black liquor solids must also be maintained on a daily basis to determine operating rates and emissions rates.

NO_x emissions from recovery boilers are mainly attributed to fuel NO_x, resulting from partial oxidation of the black liquor nitrogen content. The Permittee is required to conduct a quarterly analysis on black liquor nitrogen content. The analysis will be submitted with the quarterly report and compared to the parameter set as specified in condition 4.2.8. Staged combustion in recovery boilers helps reduce NO_x emissions. Emissions may increase from the addition of sodium nitrate or other nitrogen containing compounds to the black liquor as a makeup chemical. To provide a reasonable assurance of compliance with the NO_x limits specified in Condition 3.3.5, the facility must obtain a sample of black liquor and analyze it for nitrogen content once every 120 days.

Recovery Boiler 1 performance tests conducted on October 5, 1991 show 60.8% of the allowable emission rate for carbon monoxide and 30.5% of the allowable for nitrogen oxides. Recovery Boiler 2 performance tests conducted on September 29 and September 24, 1991 show 36.8% of the allowable emission rate for carbon monoxide and 39.6% of the allowable for nitrogen oxides.

Carbon monoxide is formed as a result of incomplete combustion of the black liquor and auxiliary fuels in the recovery furnace. Emissions of carbon monoxide are minimized by proper burner design and combustion practices. There are no applicable State or Federal regulations governing carbon monoxide emissions from recovery boilers. Proper burner design and combustion practices will provide a reasonable assurance of compliance with limits specified in Condition 3.3.5. Based on test data and the fact that carbon monoxide is an uncontrolled pollutant, the likelihood of violation would be minimal, therefore, no periodic monitoring is being required.

The Permittee continuously monitors TRS and oxygen for Recovery Boiler 3 in order to calculate and record each 24-hr average corrected to 8% oxygen as required under 391-3-1-.02(6)(a). This boiler also has a continuous opacity monitor. The opacity monitor is used to provide reasonable assurance of compliance with opacity regulations. Records of the black liquor firing rate and the percent black liquor solids must also be maintained on a daily basis to determine emission rates.

The permit specifies that the facility must monitor the secondary current and secondary voltage for each electrostatic precipitator for Recovery Boilers 1, 2 and 3. These data are used to calculate total power for each precipitator. The power for each field is determined by multiplying the secondary current and secondary voltage. The total power for each precipitator is the sum of each field's power. Total power is used to provide information to track the operational status of the control

device so as to provide a reasonable assurance of proper operation and maintenance of the electrostatic precipitators. This information is used to provide reasonable assurance of compliance with the particulate matter limit. At the request of the Compliance Program, the monitoring of primary current and primary voltage was removed from the permit. These parameters are not indicative of ESP performance.

Smelt Tanks

Pressure drop and scrubbant flow rate are monitored for the Smelt Tank scrubbers to ensure proper equipment operation. The proper operation of the scrubbers and knowing that the scrubbant is inherently caustic provides a reasonable assurance of compliance with particulate matter emissions, TRS and sulfur dioxide. The likelihood of violation of the opacity standard is minimal, therefore, no opacity monitoring is required.

The following table provides the data to support the numerical ranges used to provide a reasonable assurance of compliance with emission limitations. The numerical parameter established is 90% of the minimum value of all tests reviewed for that particular parameter.

Emission Unit	Scrubbant Flow	Differential Pressure	% Allowable	Data Source
Smelt Tank #1	50	2.4	11/16/94- 78.3 12/20/95- 47.5 10/14/96- 58.9 8/11/97- 48.2 7/22/98- 20.9 4/20/99- 58.0 4/12/00- 31.6	Last 7 PM stack tests
Smelt Tank #2	54	1.6	5/3/94 - 63.6 12/19/95- 67.9 10/18/96 - 86.8 8/13/97 - 69.8 9/30/98 - 68.1 4/6/99-73.2 4/6/00 - 50.9	Last 7 PM stack tests
Smelt Tank #3	127	2.5	10/22/96 - 32.6 4/30/97 - 28.6 3/25/98 - 13.0 3/7/00 - 35.2	Last 4 PM stack tests

Smelt Dissolving Tanks 1 and 2 have 2 TRS limits defined as follows in 3.3.7: 1.05 lb/hr and 0.016 pounds per ton of black liquor solids. The average TRS emissions from tests on Smelt Tank #1 conducted on April 7, 1999 are 0.1532 lb/hr and 0.0026 lb TRS per ton of black liquor solids fired. These results are approximately 15.5% of the allowable. The average TRS emissions from tests on Smelt Tank #2 conducted on April 6, 1999 are 0.2109 lb/hr and 0.0036 lb TRS per ton of black liquor solids fired. These results are approximately 21.4% of the allowable.

Smelt Dissolving Tank 3 has a TRS limit of 0.0168 pounds of TRS per ton of black liquor solids as defined in 3.4.15. The average TRS emissions from tests on Smelt Tank #3 conducted on March 8, 1999 are 0.0133 lb TRS per ton of black liquor solids fired. These results are approximately 79.0% of the allowable.

Test Date	Smelt Tank	% allowable
April 7, 1999	1	15.5
August 11, 1997	1	26.8
December 18, 1995	1	36.9
July 21, 1993	1	65.5
October 1, 1991	1	18.6
April 6, 1999	2	21.4
August 12, 1997	2	28.6
December 19, 1995	2	43.5
July 23, 1993	2	65.5
September 25, 1991	2	15.9
March 8, 1999	3	79.0
March 25, 1998	3	80.4
October 22, 1996	3	95.2
January 10, 1995	3	48.8
September 3-4, 1992	3	92.3

Power Boilers

Pressure drop and scrubbant flow rate are monitored for the Power Boiler scrubbers to ensure proper equipment operation. The proper operation of the scrubber provides a reasonable assurance of compliance with particulate matter and opacity emissions limits specified in 3.4.20 and 3.4.19, respectively. The facility also monitors fuel feed rate and fuel type to show compliance with operat limitations on fuel type and emissions limits.

The following table provides the data to support the numerical ranges used to provide a reasonable assurance of compliance with emission limitations. The numerical parameter established is 90% of the minimum value of all tests reviewed for that particular parameter.

Emission Unit	Scrubbant Flow	Differential Pressure	% Allowable	Data Source
Power Boiler #1	1575	4.5	12/16/99 - 39.0	1 PM stack test since scrubber was replaced
Power Boiler #2	1710	4.5	7/28/99 - 42.4 7/14/00 - 32.4	2 PM stack tests since scrubber was replaced

Opacity readings from the last four compliance inspections conducted by Alicia Stephens are as follows:

Emission Unit	6/6/00	1/11/00	8/17/99	2/24/99
Power Boiler #1	10 %	10 %	10 %	10 %
Power Boiler #2	10 %	10 %	10 %	10 %

Cluster Rule

To demonstrate compliance, the Cluster Rule requires continuous monitoring of several parameters including the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs in the thermal oxidizer; process wastewater feed rate, steam feed rate and process wastewater column feed temperature for the steam stripper. In addition to requirements listed in the regulation, the Permittee must continually monitor scrubbant flow rate and pH of the incinerator scrubber as required by the Pollution Control Project. The scrubber parameters are monitored and recorded to reasonably assure compliance with VOC and particulate matter emissions limits. The likelihood of violation of the opacity standard is minimal, therefore, no opacity monitoring is required. The incinerator will be equipped with a low NO_x burner. The calculated NO_x emissions from the incinerator are 25 lb/hr (109.5 tpy). The maximum predicted impact is 39.5 ug/m³. This value is less than the NO₂ NAAQS of 100 ug/m³. Based on this information no periodic monitoring is being required for NO_x on the incinerator.

To further ensure that the facility is operating in accordance with the Cluster Rule, the Permittee must visually inspect each pulping process condensate closed collection system. Each enclosure and closed vent system used to comply with 40 CFR 450(a) shall comply with the requirements of 40 CFR 63.452(k)(1) through (6).

Package Boilers

The Package Boilers are only allowed to burn natural gas, therefore, the likelihood of violation of particulate matter and opacity limits is minimal, therefore, no monitoring is required.

Woodyard Area Chips and Fines Transfer Area

The Woodyard Area Chips and Fines Transfer Area (Equipment Group WEG1) has several point source emission points, however, no monitoring is required because likelihood of violation is minimal.

Slakers

There is no monitoring required for the water shower scrubber that controls emissions from the slakers (Equipment Group LEG1). The vents on the slakers are designed to eliminate particulate matter emissions. The calculated particulate matter emissions from the facility are 0, therefore, the violation of Georgia Rules 391-3-1-.02(b) and (e) is not likely. The maximum emissions from the slakers were calculated to be 0.5 tpy acetaldehyde and 3.8 tpy methanol.

b. Record keeping for monitoring

As indicated in condition 5.1.1, all continuous monitors and monitoring devices must be in continuous operation and data recorded during all periods of operation except for system breakdowns and repairs. The frequency at which monitoring data should be recorded on equipment that does not require a CEM is listed in condition 5.2.2 and 5.2.3. Records, consisting of identification of any deviations, including excess emissions, exceedances, and excursions from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken are required to be kept by the Permittee.

c. Reporting for monitoring

None Applicable

2. Equipment Groups

There are no applicable equipment groups in the permit.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all related information to deviations from applicable requirements.

Note: Condition 6.1.2 requires the Permittee to report any deviations resulting in excessive emissions for a period of four hours or more. This means a deviation resulting in four consecutive hours or more of excess emissions.

B. Specific Record Keeping and Reporting Requirements

Lime Kilns 1 & 2

Daily records of the lime mud firing rate and the percent lime mud solids or density must be kept for Lime Kilns 1 and 2. These records are required to determine emissions unit operating rates.

The facility must maintain daily records which indicate all HVLC and LVHC TRS gas streams that are being burned, which lime kiln is being used for the incineration, and when any stream bypasses their respective control device.

Recovery Boiler 1, 2 & 3

The facility must maintain daily records of the black liquor firing rate and the percent black liquor solids Recovery Boilers 1, 2 and 3. These records are necessary to determine emissions rates and operating rates.

Power Boilers 1 & 2

The facility must record the amount of TDF burned in the Power Boilers each operating hour, due to limit of TDF that may be burned.

The facility is subject to 40 CFR 61 Subpart E which limits the amount of mercury emissions from the facility, therefore, the average input rate of primary clarifier sludge, the average percent moisture of the sludge, and the number of hours of sludge firing that occurred within each 24-hours operating period must be recorded.

Package Boilers

The Permittee must retain records of the package boiler operation including the daily operating hours amount of natural gas burned of each boiler to demonstrate that the facility is complying with operation limits to avoid 40 CFR 52.21.

Fuel

Records of fuel receipts must be maintained to ensure compliance with 40 CFR 60 Subpart Db.

Used oil records must be maintained to ensure the facility burned specification used oil.

The facility must record the total amount of used oil burned each month in Recovery Boiler 3, Power Boilers 1 and 2 and Lime Kilns 1 and 2 due to used oil limits to avoid PSD.

The facility must also maintain records of fuel oil fired in Power Boilers 1 and 2, Recovery Boiler 3 and Lime Kilns 1 and 2 to provide a reasonable assurance of compliance with Georgia Rule 321-3-1-.02(2)(g) - Sulfur Dioxide.

Incinerator/Scrubber System

To ensure compliance with the Cluster Rule the facility must record all time during which the total HAP emissions are not controlled. The facility must also record all times in which TRS are being burned in the incinerator. This determines if Georgia Rule 391-3-1-.02(21)(gg) applicable.

Cluster Rule

The Cluster Rule requires that each applicable facility develop and implement a written startup, shutdown and malfunction plan.

Woodyard Area Chip and Fines Transfer

The facility must maintain a record of actions taken to suppress fugitive dust from all fugitive dust sources in the woodyard.

TRS

The facility must record all periods of operation during which the TRS control device is being bypassed.

The facility must record all periods of operation during which either Lime Kiln is used for control of the NCGs.

3. Equipment Groups

Not Applicable

VII. Specific Requirements

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Not Applicable

C. Insignificant Activities

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	1
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	1
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:: i) less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. ii) less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. iii) less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning: i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators;	15

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
	<p>ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.</p> <p>iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.</p> <p>iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.</p>	1
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	As needed
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	As needed
	2. Portable blast-cleaning equipment.	1
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	5
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	As needed
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	9
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	1
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	2
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts. ii) Porcelain enameling furnaces or porcelain enameling drying ovens. iii) Kilns for firing ceramic ware. iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds. v) Bakery ovens and confection cookers.	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: i) Activity is performed indoors; & ii) No significant fugitive particulate emissions enter the environment; & iii) No visible emissions enter the outdoor atmosphere.	19
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
Industrial Operations (continued)	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	6
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	105

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	60
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

D. Temporary Sources

Not Applicable

E. Short-Term Activities

The facility conducts ash pond dredging and associated spreading for two months every year. The ash pond dredging and associated spreading is subject to Rule 391-3-1-.02(2)(n) - Fugitive Dust.

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

The facility indicated applicability.

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Not Applicable

VIII. General Provisions

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

Addendum to Narrative

Formal comments and requested changes dated December 15, 2000 were received from David Massengill, Georgia Pacific's (GP) Environmental Superintendent. At the request of the Division, the facility submitted monitoring recommendations. These were received from Cliff Chamblee, GP's Senior Environmental Engineer, on January 9, 2001. Cliff Chamblee also submitted some informal requested changes that will also be addressed in the addendum. No public or EPA comments were received. The comments from GP are in *italics* and additions to the permit are underlined.

Informal Comments and Changes

1. A correction was made to 6.1.7.b.i. The word "not" was inadvertently left out of the condition. It now reads as follows:

- 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]

2. The reference for condition 4.2.8 was included in the final permit.

4.2.8 Within 60 days of the issuance of this permit, the Permittee shall perform a NO_x emissions test on Recovery Boiler 1 and Recovery Boiler 2. These tests shall establish a baseline black liquor nitrogen content to meet the limits specified in Condition 3.3.5. The Permittee shall make no changes in the operation of Recovery Boiler 1 or 2 after the tests have been conducted which would potentially increase NO_x emissions. Subsequent performance tests may be performed to establish a new black liquor nitrogen content that is acceptable to meet the limits specified in Condition 3.3.5. These tests shall be performed each time the permit is renewed.

[391-3-1-.02(6)(b)1]

3. Per an e-mail received from Cliff Chamblee on December 7, 2000 and phone call, the following changes have been made to the permit:

A change was made to the equipment list making the NSSC blow tank subject to 40 CFR 63 Subpart S. The type of scrubber for the incinerator was also corrected to a spray tower scrubber instead of a packed bed. This change does not modify any monitoring or testing conditions. The equipment list was changed as follows:

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
COND	Process Condensates	40 CFR 63 Subpart S	3.3.25 through 3.3.29, 4.2.4, 4.2.6*	R425	Condensate Stripper, Incinerator/ Packed Bed <u>Spray Tower Scrubber</u>

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
R425	NCG/SOG Incinerator/Scrubber	40 CFR 63 Subpart S, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(gg)	3.3.17 through 3.3.19, 3.4.24 through 3.4.28, 4.2.3 through 4.2.6, 5.2.2, 5.2.5 through 5.2.7, 6.2.11*	R425	Packed Bed Spray Tower Scrubber
DGS1	Digester System (12 Digesters)	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 391-3-1-.02(2)(gg)	3.3.25, 3.3.27, 3.3.28, 3.4.29*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Spray Tower Scrubber
EVS1	Multiple- Effect Evaporator System	40 CFR 60 Subpart BB, 40 CFR 63 Subpart S, 391-3-1-.02(2)(gg)	3.3.25, 3.3.27, 3.3.28, 3.4.29*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Spray Tower Scrubber
TRS1	Turpentine Recovery System	40 CFR 63 Subpart S	3.3.25, 3.3.27, 3.3.28*	L600, L601, R425	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Spray Tower Scrubber
SOG1	NSC Blow Tank , <u>NSSC</u> Brownstock Washers, Filtrate Tanks, Spent Liquor Tank	none	none*	L600, L601, R425 <u>none</u>	Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Packed Bed Scrubber <u>none</u>
<u>S200</u>	<u>NSSC Blow Tank</u>	<u>40 CFR 60 Subpart S</u>	<u>3.3.21, 3.3.23, 3.3.24*</u>	<u>L600, L601, R425</u>	<u>Lime Kiln No.1, Lime Kiln No. 2, Condensate Stripper, Incinerator/ Spray Tower</u> Scrubber

Formal Comments

1. The facility believes the Division has imposed new monitoring requirements for a standard that already contains periodic monitoring requirements. The facility requests that these additional monitoring requirements be deleted from the final permit in light of the recent decision by the United States Court of Appeals for the District of Columbia Circuit, Appalachian Power Co., et al v. Environmental Protection Agency (Appalachian Power).

Specifically, the following monitoring requirement is listed in the draft permit which the facility claims is not all under the Appalachian Power decision:

- a. ESP monitoring for Recovery Boiler Nos. 1, 2, and 3 determining total power from secondary parameters at least every two hours.

December 15, 2000 letter

The problem with the use of a power factor to determine the compliance for the PM standard from the recovery boilers is threefold. First, the frequency of the monitoring requirement is a once every two hour reading. Power factors in precipitators vary on a minute-by-minute basis. A spark will cause the amp and voltage readings to jump. To determine the power factor based on a discrete snapshot of the readings is not an accurate representation on the performance of the ESP. Second, these precipitators are over designed. On the No. 3 Recovery Boiler, the precipitator is designed so that the entire flow of flue gases can go through one half of the precipitator and still maintain compliance. Therefore, limiting compliance to a power factor that was determined during the last stack test would not necessarily indicate a drop in performance that would lead to excessive emissions.

Finally, the volume of information that must be manipulated to maintain compliance with this requirement is quite significant. There are six fields in each of the No. 1 and No.2 Recovery Boiler precipitators and eight fields in the No. 3 Recovery Boiler precipitator. Each field has a secondary voltage and amperage reading that must be multiplied together and then these products must be added to determine compliance every two hours. All of the calculations would currently have to be performed manually. Cedar Spring Operation believes that continuous opacity monitoring systems (COMS) combined with prescribed performance testing requirements provide a better indication of the ESP performance and compliance with Georgia Rule 391-3-1-.02(e).

January 9, 2001 letter

With respect to the calculation of the total power for the electrostatic precipitators referenced in permit conditions 6.1.7(c)(iii), 6.1.7(c)(v), and 6.1.7(c)(vii), Cedar Springs Operation proposed that the total power be calculated once a day. An excursion would still be defined as three consecutive readings of the value determined in accordance with 4.2.2. Condition 5.2.3(c) should also be modified to show that secondary current and voltage will be recorded no less than once each 24 hours of operation.

The authority cited for the monitoring is Georgia Rule 391-3-1-.02(6)(b)1 only, therefore, the Appalachian Power court case is not applicable. This reference was previously incorrectly listed as 391-3-1-.02(2)(a)10.

The Division agrees that recording parameters and calculating total power every two hours is excessive. The recordkeeping will be relaxed to once per shift.

The Division believes that continuous opacity monitors are not adequate to provide a reasonable assurance of compliance with the particulate matter standard. It is possible for the facility to comply with the opacity limit and not comply with the PM limit.

The condition was modified as follows:

5.2.3 c. Secondary current and secondary voltage for each electrical isolatable section (bus section) of the electrostatic precipitator for Recovery Boilers 1, 2 and 3. Data shall be recorded once ~~every two hours~~ per shift of operation. The total power for each precipitator shall be determined and recorded from the secondary parameters no less than once ~~every two hours~~ per shift of operation.
[391-3-1-.02(2)(a)+06(b)1]

2. The facility also states that the Division has included periodic monitoring provisions that it believes are too restrictive. The level of monitoring is of concern.

December 15 letter

Following is an applicable standard which the facility believes is permissible. However, would like for the monitoring to be modified from:

At a minimum of once every 120 days, the Permittee shall obtain a sample of black liquor to be burned in Recovery Boilers 1 and 2. Each sample shall be analyzed for nitrogen content.

to:

Recovery Boiler 1 and 2 will be tested for NO_x emission once every permit cycle. If the results are 50% below the permit limit, no further testing is required. If the results are greater than 50% of the permit limit testing will be required every two years.

While the additional burden of testing the nitrogen content of the black liquor is not substantial, Cedar Springs Operations is concerned that the limits imposed on the nitrogen content, under section 6.1.7.c.iv of 10% of the value found during the stack test, are arbitrary and do not necessarily reflect when an air excursion or an emissions increase of consequence has occurred. Since the original stack test performed on the Recovery Boilers showed the boilers to be operating at 30% and 40% of the permit limit, the facility feels that good combustion practices will maintain the NO_x emissions well below the permit limits. Also, a review of literature on the amount of NO_x that is generated from fuel-bound nitrogen shows that only 30-60% of the nitrogen in the fuel is converted to NO_x. The remaining 30-60% is generated as elemental nitrogen and the rest is captured in the smelt as a salt. Furthermore, the test for determining the nitrogen content in black liquor is only accurate to within approximately 10%. The normal amount of nitrogen in black liquor is 1000 ppm. The 10% limit would mean a 100 ppm change in the nitrogen content would generate an excursion. Furthermore, Cedar Springs Operations believes that the test method for determining the nitrogen content of black liquor is outside the accuracy of the 10% limit. Therefore, simple testing deviation could create an excursion incident.

January 9 letter

With respect to determining compliance for the NO_x limit for Recovery Boilers 1 and 2, Cedar Springs Operations proposes that the excursion limit referenced in permit condition 3.1.7.c.iv and 6.1.7.c.vi be changed from 10% greater than the parameter established in condition 4.2.8 to making the limit the inverse of the higher percent of permit compliance. Condition 4.2.8 requires that a stack test be performed within

60 days of issuance of the Title V permit. The last stack test that was performed on the Recovery Boilers for NO_x compliance showed the sources at 30% and 40 % of the permit limit. Under this proposed limit, an excursion would occur if the nitrogen content increased by 250%. A review of literature on this issue shows that only 30% to 60% of the nitrogen in the black liquor is emitted from the Recovery Boiler as NO_x, therefore, increasing the nitrogen content in the black liquor by 250% will still not cause NO_x emissions to exceed the permit limit.

In essence, the company is requesting that the limits imposed on the nitrogen content of the black liquor, stated as not to exceed 10 % above the value found during the required emissions test for nitrogen oxides should be modified because this tolerance range is too restrictive given the method used for determination of the nitrogen content and the fact that the degree of compliance implied by the nitrogen content found during the complying emissions tests more than adequate. After a review of the comment, the Air Branch concurs that some modification of the procedure to select the reportable nitrogen content should be made. The company cites data that demonstrates that only 30% to 60% of the nitrogen in the black liquor is actually converted to NO_x, that the complying emissions tests were between 30% to 40% of the permit limit and the accuracy of the test method would not warrant such a restrictive range. The company then suggests that as much as a 250% increase in the nitrogen content may still assure compliance.

In selecting a proper range of a parameter that may relate to the reasonable assurance of compliance, the Air Protection Branch must take in consideration several issues. Among these are (1) that the parameter is related to a causal effect on emissions, (2) that the magnitude or range chosen will reasonably assure that compliance exists with all applicable requirements, including the obligation to effect operation with good air pollution practices, and (3) effect of intermittent data collection (in this case, every 120 days) and the accuracy of determining the parameter values to ensure that a minimal number of "false positives or negatives" will occur.

Considering all of the above, with the desire to both provide reasonable but accurate determinations of the on-going compliance status, the EPD has modified the draft permit condition to state that excursions to be reported would occur when the nitrogen content determined as required in condition 5.2.4, exceeds by greater than 50 %, the average value found during the performance test for nitrogen oxides required in condition 4.2.8. The information simply does not support a greater percentage due to the limited indication of linearity in the nitrogen content conversion, the limited compliance test data and the ability of the frequency of data collection to be adequate when emission rates are nearer the permitted limit. Should the company wish to demonstrate the compliance with all requirements would exist at a different nitrogen content in order to raise the allowed excursion trigger, it may do upon notification and agreement by the EPD, and if found acceptable, the permit may then be modified to reflect the new definition of the excursion.

The following changes were made to the permit:

Recovery Boiler 1

6.1.7.c.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

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

3. December 15 letter - Also, due to a recent settlement of a lawsuit between the American Forest and Paper Association and the EPA on determinations of New Source Performance Standards for Storage Tanks (NSPS Subpart Kb), we understand that EPA has drafted a Rule that will allow for de minimis size and vapor pressure cutoffs that will exempt a number of tanks from the recordkeeping requirement. We further understand, that EPA either has, or will shortly, issue documentation to the Regions, stating that these tanks are not covered under Subpart Kb. As such, we request that the references to Subpart Kb for the black liquor tanks be removed from the permit.

When the Division receives guidance regarding this issue, the permit will be modified accordingly.

4. December 15 letter - Finally, Cedar Springs Operations request some clarification on a point. Condition 4.2.2 requires stack testing to be done based on a schedule determined by the results from stack tests. Does the most recent stack test determine when the next stack test is required, or does the next stack test start this cycle?

The company should proceed stack testing as normal and the first stack test conducted after issuance of the final Title V permit will follow the criteria specified in Condition 4.2.2. No changes were made to the permit.

5. January 9 letter - Cedar Springs Operations is requesting clarification on condition 6.1.7.c.xii. This requirement is that an exceedance occurs anytime (excluding SSM) during which the total HAP emissions from each LVHC system are not controlled. The GPPA has had preliminary discussions with the GA EPD concerning an issue similar to this with respect to the SSM Plan. In the last discussions, GPPA proposed that a de minimis five minute value be used to prevent excessive reporting of self-correcting microburst. Cedar Springs Operations is not aware of any response to the GPPA proposal. Our confusion stems from the applicability of the requirement. One way of interpreting this requirement is that it only applies to the control device and the total system must be venting outside the SSM plan for an exceedance to occur. Another way to interpret this requirement is that a single source that is normally collected by the LVHC system could vent locally causes an exceedance. This would remove the allowances in the Cluster Rule for the LDAR program to have five days to attempt a repair on a leak since any leak would indicate that total HAP emissions were not being controlled. Our current permit specifically list NCG control system venting from the major ducting that bypasses the TRS control device. Cedar Springs Operation proposed that the current language remain in effect and this issue will be addressed then the Cluster Rule modifications are made.

The condition means what it says, ventings that occur and are not controlled (excluding SSM provisions) are to be reported when detected. There is no de minimis level for this excursion. No changes were made to the permit.

Additional changes

1. Modified Conditions 3.3.16, 6.1.7.d.i., 6.2.8, and added Condition 5.2.8 to include on-site generated used oil. The changes are as follows:

3.3.16 The Permittee shall not fire more than 1,400,000 gallons total of used oil in Recovery Boiler 3, Power Boilers 1 and 2 and Lime Kilns 1 and 2 per year. The Permittee may burn on-site generated on specification used oil in Power Boiler 2.

[40 CFR 52.21 Avoidance]

- 5.2.8 At a minimum of once every 90 days, the Permittee shall analyze a composite sample of on-site generated used oil burned in Power Boiler 2. The analysis shall indicate the concentration of arsenic, cadmium, chromium, lead, halogens, and flash point.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.1.7.d.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.
- 6.2.8 The Permittee shall record the total amount of used oil (on-site or off-site) burned each month in Recover Boiler 3, Power Boilers 1 and 2 and Lime Kilns 1 and 2.
[40 CFR 52.21 Avoidance]
2. Method 25 for the determination of total VOC emissions reported as Methanol was included in Condition 4.1.3.
3. Corrections made in Conditions 6.1.7.b.vii. and 6.1.7.b.xiii.
- 6.1.7.vii. Any time of process operation during which the used oil burned does not meet the specifications defined in ~~3.3.13~~15.
[40 CFR 266.40(e)]
- 6.1.7.xiii. Any time (excluding periods of startup, shutdown or malfunction) of process operation during which the total HAP emissions from the equipment listed in ~~3.3.19~~22 are not controlled after April 17, 2006.
[40 CFR 63.443(a)(1)(i) through (v) and 63.443(b)(1)]
4. The facility is subject to all applicable provisions of Federal Standard 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. This has been included in the permit as Condition 3.3.33. The permit will be reopened later to add the requirements/details.
- 3.3.33 The Permittee shall be subject to all applicable provisions of Federal Standard 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
[40 CFR 63 Subpart MM]

Draft Permit Review		
Reviewing Program	Comments Received? (y/n)	Comments Taken Into Consideration In Draft Permit? (y/n)
ISMP		
SSCP		

SSPP Unit Manager:

_____ //SSPP Unit Manager// _____ Date

SSPP Program Manager:

_____ SSPP Program Manager _____ Date