

Facility Name: **Georgia-Pacific Corporation – Savannah River Mill**

City: Rincon

County: Effingham

AIRS Number: 04-13- 103-00007

Application #: TV- 13598

Date SIP Application Received: February 14, 2002

Date Title V Application Received: February 14, 2002

Date of Permit: September 28, 2001

Permit No: 2621-103-0007-V-02-0

| Program | Review Engineers | Review Managers |
|----------------|-------------------------|------------------------|
| SSPP | Wendy Troemel | Heather Abrams |

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached administrative Title V Permit amendment. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit amendment is to make administrative changes to the permit. Such administrative changes may include a facility name and/or ownership change and fixing typographical errors. The following narrative is designed to accompany the permit amendment and is presented in the same general order as the permit amendment. It describes the facility receiving the permit amendment, existing permits and the changes being made to the permit. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

| Permit/Amendment Number | Date of Issuance | Comments | |
|-------------------------|--------------------|----------|----|
| | | Yes | No |
| 2621-103-0007-V-01-0 | September 28, 2001 | | X |

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

Fort James is major under PSD regulations. In 1985, the facility underwent a PSD review for the construction of the facility in Rincon, Georgia. The following equipment took limitations to avoid PSD review.

1. The Package Boiler (Source Code: BO06) accepted limitations to avoid being subject to PSD review. The PSD avoidance limits listed in the permit condition below were implemented in Georgia Air Quality Permit No. 2647-051-10547, condition 7.

The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 6 Package Boiler any emissions which:

- a. Contain particulate matter in excess of 25 tons per any twelve consecutive months;
- b. Contain sulfur dioxide in excess of 40 tons per any twelve consecutive months;
- c. Contain nitrogen oxides in excess of 40 tons per any twelve consecutive months.

In order for the facility to meet the above limits, records indicate that the facility accepted limitations on the boiler's operating time. The total operating time was limited to 2,200 hours during any twelve consecutive months and the operating time on fuel oil was limited to 900 hours during any twelve consecutive months. These operating limitations were contained in Georgia Air Quality Permit No. 2647-051-12420, conditions 48 and 49. (However, records indicate that these limits were not included in Permit No. 2647-051-10547.)

2. Four of the paper machines (Nos. 16-19, Source Codes: PM01 through PM04) and the solvent cleaning equipment associated with them, which were in existence on October 6, 1994, accepted limitations to avoid being subject to PSD Review. The PSD avoidance limit listed in the permit condition below were implemented in Georgia Air Quality Permit No. 2647-051-8892 (condition 6a of Permit No. 2647-051-12420).

- a. The Permittee shall not discharge into the atmosphere volatile organic compound (VOC) emissions resulting from solvent usage in an amount equal to or exceeding 40 tons during any twelve consecutive months.
3. Paper Machine No. 20 (Source Code: PM05) and the associated solvent cleaning equipment, which was installed in 1998, accepted limitations to avoid being subject to PSD review. The PSD avoidance limits listed in the permit condition below were implemented in Georgia Air Quality Permit No. 2647-051-8892 (conditions 6b and 36 of Permit No. 2647-051-12420).
- a. The Permittee shall not discharge into the atmosphere volatile organic compound (VOC) emissions resulting from solvent usage in an amount equal to or exceeding 40 tons during any twelve consecutive months.
- b. The Permittee shall not allow No. 2 fuel oil to be burned in Paper Machine No. 20 (Source Code: PM05) on more than 90 calendar days during any twelve consecutive month period.
4. Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02), Paper Machines Nos. 16-20 (Source Codes: PM01 through PM05), and Waste Heat Recovery Boilers (Source Codes: WH01 and WH02) took a limit of 0.5 percent sulfur content limit in the fuel to meet the requirements of BACT. The limit listed in the permit condition below was implemented in Georgia Air Quality Permit No. 2647-051-8892 (condition 9 of Permit No. 2647-051-12420).
- a. The Permittee shall not burn any fuel oil in the paper dryers or the combustion turbine/waste heat boiler units which contain in excess of 0.5 percent sulfur. Compliance with this requirement shall be documented by records of analysis of purchased oil.
2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

| Pollutant | Is the Pollutant Emitted? | If emitted, what is the facility's Title V status for the Pollutant? | | |
|------------------|---------------------------|--|-----------------------------------|-------------------------|
| | | Major Source Status | Major Source Requesting SM Status | Non-Major Source Status |
| PM | Yes | ✓ | | |
| PM ₁₀ | Yes | ✓ | | |
| SO ₂ | Yes | ✓ | | |
| VOC | Yes | ✓ | | |
| NO _x | Yes | ✓ | | |
| CO | Yes | ✓ | | |
| TRS | Yes | | | ✓ |
| H ₂ S | Yes | | | ✓ |
| Individual HAP | Yes | ✓ | | |
| Total HAPs | Yes | ✓ | | |

Regulatory Analysis**II. Proposed Amendment****A. Description of Amendment**

Application number 13598 indicated that the facility, currently permitted under the name Fort James Savannah River Mill, with the parent/holding company being Fort James Corporation, had changed the name of the facility. The facility will now be called Georgia-Pacific Corporation – Savannah River Mill, with the parent/holding company being Georgia-Pacific Corporation dba (doing business as) Fort James Operating Company. There has been no change in ownership, as the Savannah River Mill is still owned and operated by Fort James Operating Company, which is wholly owned by Fort James Corporation. Georgia-Pacific Corporation owns Fort James Corporation. The direct owner/operator of the mill has not changed.

Since there is a change of facility name, Air Quality Permit Number 2621-103-0007-V-01-0 will be revoked and replaced with Air Quality Permit Number 2621-103-0007-V-02-0, with the same effective date of September 28, 2001. All current permit conditions will be incorporated into Air Quality Permit Number 2621-103-0007-V-02-0.

The application was received February 14, 2002. EPD acknowledged receipt of the application on March 21, 2002. The application was deemed complete on March 21, 2002 with a review of the application.

B. Emission and Operating Caps

There are no new emission or operating caps associated with this modification.

C. Monitoring and Record keeping

There are no new monitoring or record keeping requirements associated with this modification.

D. Permit Conditions

There are no new permit conditions associated with this modification.