

Facility Name: **Fort James Savannah River Mill**  
 City: Rincon  
 County: Effingham  
 AIRS #: 04-13-103-00007

Application #: TV-9283  
 Date Application Received: October 22, 1996; November 18, 1997; July 31, 1998  
 Date Application Deemed Administratively Complete: November 17, 1997  
 Date of Draft Permit:  
 Permit No: 2621-103-0007-V-01-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1. 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. The purpose of this narrative is to provide information only. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification****1. Facility Name**

Fort James Savannah River Mill (The facility name provided in the Title V application is Savannah River Mill, Fort James Operating Company).

**2. Parent/Holding Company Name**

Fort James Corporation

**3. Previous and/or Other Name(s)**

The facility previously operated under the name Fort Howard Corporation.

**4. Facility Location**

393 Fort Howard Road  
Rincon, Georgia 31326  
(Effingham County)

**5. Attainment or Non-attainment Area Location**

The facility is located in an attainment area for all criteria pollutants.

**6. Class I Area Impacts**

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

**B. Site Determination**

There are no site determination issues as there are no other facilities which could possibly be contiguous or adjacent and 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
2647-051-12420	June 9, 1997	X	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
2647-051-12420	Consolidated permit for the operation of a paper production facility to include four 422 MMBTU/hour boilers*, two 453 MMBTU/hour combustion turbines/waste heat boilers, five paper machines each with two drying hoods, a membrane cell chlor-alkali plant/absorption tower, and a 170 MMBTU/hour gas/distillate oil package boiler.

\* **NOTE** – This permit was wrong in that there are only three 422 MMBTU/hour boilers. BO04 does not exist and is not mentioned at all in the remainder of this narrative and the permit.

#### D. Process Description

##### 1. SIC Code(s)

Major - 2621 – Recycled, deinked tissue, towel, and napkin products

##### 2. Description of Product(s)

Fort James produces paper towels, tissue paper, and napkins using recycled paper products.

##### 3. Overall Facility Process Description

Chemical Plant – The chemical plant consists of a chlor-alkali system that produces caustic soda and bleach (calcium hypochlorite) to be used to clean the pulp in the paper making process and wastewater in the effluent treatment plant. The chlor-alkali system charges purified sodium brine to the anodic side of electrolytic membrane cells. A D.C. electric current is applied to the cells producing chlorine gas and depleted brine at the anode and hydrogen gas and caustic at the cathode. The depleted brine is sent to a dechlorinator to remove any residual chlorine and is reused in the cells. A scrubber is used to control any chlorine emissions from the dechlorinator. The chlorine gas produced is sent via a distribution box to one of the four hypo-batch tanks where the gas is mixed with a lime and water mixture to produce calcium hypochlorite bleach. The recirculating mixture goes through an absorption tower to keep the temperature low enough so that the chlorine does not burn off or mix with the lime to become salt. A scrubber is used to control any chlorine emissions from the absorption tower.

Power Plant – The Power Plant provides the entire facility’s electric power and steam. Power and steam are produced by three 422 MMBTU/hr circulating fluidized bed boilers which are capable of combusting coal, fuel oil, pet coke, wood, natural gas, peat, and plant and office waste. Two of the boilers are also capable of firing tire-derived fuel (TDF). The emissions from each boiler are controlled by limestone injection and a baghouse. A 170 MMBTU/hr natural gas and No. 2 fuel oil “package boiler” serves primarily as a backup boiler. Power is also supplied to the mill by two 453 MMBTU/hr natural gas and No. 2 fuel oil combustion turbines coupled by two 80 MMBTU/hr natural gas and No. 2 fuel oil waste heat recovery boilers.

Pulp Processing Area – The pulp processing area pulps, deinks, cleans, and bleached wastepaper to a specific brightness. The pulping occurs in pulpers in which water paper is combined with chemicals, hot white water, and then cooked with steam making the pulp into a slurry, separating the clay and other coatings from the fibers and chemically deinking the stock using caustic soda and detergents. The washed stock is then sent through screens to remove plastic, latex, sand, clay, and other materials. Water is then removed from the stock and the stock is then bleached in one of the three bleach towers using calcium hypochlorite bleach. Bleached and semi-bleached stock are mixed and then sent to five of the paper machines to produce various paper products. Each paper machine consists of two 32 MMBTU/hour natural gas and No. 2 fuel oil fired drying hoods. The paper product is then sent to one of the six flexographic printers to print designs on the paper. The facility also consists of five solvent cleaning processes and eighteen solvent cleaning machines.

4. Overall Process Flow Diagram (optional)

Process flow diagrams can be found in the facility’s Title V permit application.

E. Regulatory Status

1. PSD/NSR

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	✓	✓		
PM <sub>10</sub>	✓	✓		
SO <sub>2</sub>	✓	✓		
VOC	✓	✓		
NO <sub>x</sub>	✓	✓		
CO	✓	✓		
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

## 3. MACT Standards

The facility is subject to 40 CFR 63 Subpart KK – “National Emission Standards for the Printing and Publishing Industry” for the Flexographic Printers Nos. 1 – 6 (Source Code: FX01 – FX06). The rule was promulgated May 30, 1996 and the facility had to be in compliance by May 30, 1999. A letter from the facility dated April 7, 2000 indicated that the facility was in compliance as of May 30, 1999.

The facility is not subject to 40 CFR 63 Subpart S – “National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry”. §63.445(a) and (a)(3) states “Owners and operates of the following systems shall meet all the provisions of this section - Bleaching systems bleaching pulp from mechanical pulping processes using wood or from any process using secondary or non-wood fibers, that use chlorine dioxide.” However, in a letter dated March 12, 1999, the facility informed the Division that they do not use chlorine dioxide in the bleach plant. Therefore, they

are not subject to the requirements of §63.445(b) and (c) for the secondary fiber bleaching system.

#### 4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	No
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:

The facility does not have any facility-wide caps or limits on emissions, hours of operation, etc.

#### B. Applicable Rules and Regulations / Emission and Operating Standards

The facility does not have any rules and regulations that apply facility-wide.

#### C. Compliance Status

The facility has indicated in their Title V permit application that they are in 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 in their Title V permit application.

#### E. Permit Conditions

None applicable

### 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
BO01	Circulating Fluidized Bed Boiler #3	40 CFR 52.21, 40 CFR 60 Subpart D, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.4, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.4.1, 3.4.2, 4.2.3, 5.2.1, 5.2.6, 5.2.7, 5.3.1, 6.1.7, 6.2.3, 6.2.4	LS01, BH01	Lime Injection, Baghouse
BO02	Circulating Fluidized Bed Boiler #4	40 CFR 52.21, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.4, 3.3.7, 3.3.8, 3.3.10, 3.3.12, 3.4.3, 4.2.2, 4.2.3, 5.2.1, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.3.1, 5.3.2, 6.1.7, 6.2.3	LS02, BH02	Lime Injection, Baghouse
BO03	Circulating Fluidized Bed Boiler #5	40 CFR 52.21, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.4, 3.3.7, 3.3.8, 3.3.10, 3.3.12, 3.4.1, 3.4.2, 4.2.2, 4.2.3, 5.2.1, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.3.1, 5.3.2, 6.1.7, 6.2.3, 6.2.4	LS03, BH03	Lime Injection, Baghouse
BO06	Package Boiler, Boiler #6	40 CFR 52.21 Avoidance, 40 CFR 60 Subpart Db, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.4, 3.3.8, 3.3.11, 3.3.13, 3.3.17, 3.3.18, 3.4.4, 3.4.6, 4.2.4, 5.2.1, 5.2.2, 5.3.1, 6.1.7, 6.2.3, 6.2.5, 6.2.7	None	None
CT01	Combustion Turbine #1	40 CFR 52.21, 40 CFR 60 Subpart GG, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.5, 3.3.14, 3.3.19, 3.4.4, 3.4.7, 4.2.1, 5.2.2, 6.1.7, 6.2.2, 6.2.3	None	None
CT02	Combustion Turbine #2	40 CFR 52.21, 40 CFR 60 Subpart GG, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.1, 3.3.5, 3.3.14, 3.3.19, 3.4.4, 3.4.7, 4.2.1, 5.2.2, 6.1.7, 6.2.2, 6.2.3	None	None
WH01	Waste Heat Recovery Boiler #1	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.19, 3.4.4, 3.4.6, 3.4.7	None	None
WH02	Waste Heat Recovery Boiler #2	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.3.19, 3.4.4, 3.4.6, 3.4.7	None	None
PM01	Paper Machine #16, process including drying hoods	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.16, 3.3.19, 3.4.4, 3.4.5, 3.4.8, 6.2.3, 6.2.9, 6.2.10	None	None
PM02	Paper Machine #17, process including drying hoods	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.16, 3.3.19, 3.4.4, 3.4.5, 3.4.8, 6.2.3, 6.2.9, 6.2.10	None	None
PM03	Paper Machine #18, process including drying hoods	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.16, 3.3.19, 3.4.4, 3.4.5, 3.4.8, 6.2.3, 6.2.9, 6.2.10	None	None
PM04	Paper Machine #19, process including drying hoods	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.16, 3.3.19, 3.4.4, 3.4.5, 3.4.8, 6.2.3, 6.2.9, 6.2.10	None	None
PM05	Paper Machine #20, process including drying hoods	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.16, 3.3.19, 3.3.20, 3.4.4, 3.4.5, 3.4.8, 6.1.7, 6.2.3, 6.2.6, 6.2.8, 6.2.9, 6.2.10	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CA15	Chlor-Alkali Plant	391-3-1-.02(2)(a)3(ii)	3.5.1, 3.5.2, 5.2.3, 6.1.7	CA20 CA21	Brine Dechlorinator Scrubber Absorber/Bleach Tanks Scrubber
FX01	Flexographic Printer #1	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
FX02	Flexographic Printer #2	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
FX03	Flexographic Printer #3	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
FX04	Flexographic Printer #4	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
FX05	Flexographic Printer #5	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
FX06	Flexographic Printer #6	40 CFR 63 Subpart KK	3.3.2, 3.3.6, 3.3.15, 6.1.7, 6.2.9, 6.2.10	None	None
PW01	Parts Washer #1	None	None	None	None
PW02	Parts Washer #2	None	None	None	None
PW03	Parts Washer #3	None	None	None	None
PW04	Parts Washer #4	None	None	None	None
PW05	Parts Washer #5	None	None	None	None
PW06	Parts Washer #6	None	None	None	None
PW07	Parts Washer #7	None	None	None	None
PW08	Parts Washer #8	None	None	None	None
PW09	Parts Washer #9	None	None	None	None
PW10	Parts Washer #10	None	None	None	None
PW11	Parts Washer #11	None	None	None	None
PW12	Parts Washer #12	None	None	None	None
PW13	Parts Washer #13	None	None	None	None
PW14	Parts Washer #14	None	None	None	None
PW15	Parts Washer #15	None	None	None	None
PW16	Parts Washer #16	None	None	None	None
PW17	Parts Washer #17	None	None	None	None
PW18	Parts Washer #18	None	None	None	None
FL01	Napkin and Folder Printer #1	None	None	None	None
FL02	Napkin and Folder Printer #2	None	None	None	None
FL03	Napkin and Folder Printer #3	None	None	None	None
FP04	System 1, Bleaching	None	None	None	None
FP05	System 2, Bleaching	None	None	None	None
FP06	System 3, Bleaching	None	None	None	None
FP08	System 4, Bleaching	None	None	None	None
FP07	Effluent Treatment Plant	None	None	None	None
SC15	Solvent Cleaning in Pulp Processing	None	None	None	None
SC16	Solvent Cleaning, PM16	None	None	None	None
SC17	Solvent Cleaning, PM17	None	None	None	None
SC18	Solvent Cleaning, PM18	None	None	None	None
SC19	Solvent Cleaning, PM19	None	None	None	None
SC20	Solvent Cleaning, PM20	None	None	None	None

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

## C. Equipment & Rule Applicability

### **Emission and Operating Caps**

Circulating Fluidized Bed Boiler Nos. 3 (Source Code: BO01) and 5 (Source Code: BO03) are capable of burning tire-derived fuel (TDF). Each boiler is limited to burning no more than 3.5 tons per hour of TDF. This limitation was based on trial burns performed on Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) on May 8-12, 1991. Since the boiler did not exceed NO<sub>x</sub>, SO<sub>2</sub>, PM and opacity limits while burning TDF at 3.5 tons per hour, 3.5 tons per hour was incorporated into the permit (condition 5 in Permit No. 2647-051-12420).

The total operating time of the Package Boiler (Source Code: BO06) is limited to 2,200 hours during any twelve consecutive months, and the operating time while burning fuel oil is limited to 900 hours during any twelve consecutive months. These limits are needed to meet PSD limitations.

### **Applicable Rules and Regulations**

1. Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) has a heat input capacity of 422 MMBTU/hour and is capable of firing coal, No. 2 fuel oil, pet coke, wood, TDF, natural gas, peat, and plant and office waste. The Division's records indicate that the facility did not want to accept an annual capacity factor limit; therefore, the boiler will be treated as a boiler that combusts only coal. It is subject to the following rules and regulations:
  - 40CFR 52.21 - As discussed in Section I.E.1, this boiler underwent a PSD review with the rest of the facility in 1985.
  - 40 CFR 60 Subpart D – “Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971.” This boiler was constructed, modified, or reconstructed between June 19, 1984 and June 19, 1986. According to §60.40b(b)(2), coal-fired boilers are subject to Subpart D for sulfur dioxide standards, and to Subpart Db for nitrogen oxide and particulate matter standards. Subpart D limits the sulfur dioxide emissions to 1.2 pounds per million BTU for boilers capable of burning solid fossil fuel or solid fossil fuel and wood residue.
  - 40 CFR 60 Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” As discussed above, the boiler is subject to Subpart Db for nitrogen oxide and particulate matter standards. Subpart Db limits the particulate matter emissions to 0.05 pounds per million BTU for boilers that combust only coal and limits the opacity to 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. Subpart Db limits the nitrogen oxides from coal-fired fluidized bed combustion to 0.6 pounds per million BTU.

- Georgia Rule 391-3-1-.02(2)(d) – “Fuel-burning Equipment.” The opacity limit in Subpart Db mirrors the opacity limit in Georgia Rule (d). The particulate matter limit (which would be 0.077 pounds per million BTU) is subsumed by Subpart Db.
  - Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur dioxide limit in Subpart D mirrors the sulfur dioxide limit in Georgia Rule (g).
2. Circulating Fluidized Bed Boiler Nos. 4 and 5 (Source Codes: BO02 and BO03) each have a heat input capacity of 422 MMBTU/hour and is capable of firing coal, No. 2 fuel oil, pet coke, wood, natural gas, peat, and plant and office waste. Boiler BO03 is also capable of firing TDF (with the limitation explained above in “Emissions and Operating Caps”). The Division’s records indicate that the facility did not want to accept an annual capacity factor limit; therefore, the boiler will be treated as a boiler that combusts only coal. They are subject to the following rules and regulations:

- 40CFR 52.21 - As discussed in Section I.E.1, these boilers underwent a PSD review with the rest of the facility in 1985.
- 40 CFR 60 Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” Both of these boilers were constructed, modified, or reconstructed after June 19, 1984. Subpart Db limits the sulfur dioxide emissions in excess of 10 percent of the potential sulfur dioxide emission rate (90 percent reduction) and sulfur dioxide emissions from each boilers to the following equation:

$$ES = (1.2H_a + 0.8 H_b)/H_a + H_b$$

Where:

ES	=	SO <sub>2</sub> emission limit in pounds per million BTU heat input
H <sub>a</sub>	=	heat input from the combustion of coal in million BTU
H <sub>b</sub>	=	heat input from the combustion of fuel oil in million BTU

Subpart Db limits the particulate matter emissions to 0.05 pounds per million BTU for boilers that combust only coal and limits the opacity to 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. Subpart Db also limits the nitrogen oxides from coal-fired fluidized bed combustion to 0.6 pounds per million BTU.

- Georgia Rule 391-3-1-.02(2)(d) – “Fuel-burning Equipment.” The opacity limit in Subpart Db mirrors the opacity limit in Georgia Rule (d). The particulate matter limit (which would be 0.077 pounds per million BTU) is subsumed by Subpart Db.
- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur dioxide limit of 1.2 pounds per million BTU is subsumed by the limit in Subpart Db.

3. Package Boiler (Source Code: BO06) has a heat input capacity of 170 MMBTU/hour and is capable of firing natural gas and No. 2 fuel oil. It is subject to the following rules and regulations:

- 40 CFR 52.21 – As discussed in Section I.E.1, this boiler took limits to avoid being subject to a PSD review. These are yearly limits for particulate matter, sulfur dioxide, nitrogen oxides, and operating hours. None of these limits subsume any Subpart Db limits.
- CFR 60 Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” This boiler was constructed, modified, or reconstructed after June 19, 1984. Subpart Db requires boilers in which the percent reduction requirements are not applicable to meet the definition of “very low sulfur oil” in 40 CFR 60.41b. (It is defined as a oil that when combusted, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million BTU hear input, contains 0.5 weight percent sulfur or less, and complies with the specifications for fuel oil numbers 1 and 2, as defined by ASTM D396-78. Also, since the source can only use “very low sulfur oil”, it subsumes the sulfur limit in fuel according to Georgia Rule 391-3-1-.02(2)(g)3. Subpart Db limits the nitrogen oxides to 0.20 pounds per million BTU (the boiler is classified as a high heat release boiler for natural gas and distillate oil). No particulate matter emissions limits from Subpart Db apply since the boiler combusts does not combust coal, wood, or municipal-type solid waste. Subpart Db limits the opacity to 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
- Georgia Rule 391-3-1-.02(2)(d) – “Fuel-burning Equipment.” The opacity limit in Georgia Rule (d) mirrors the opacity limit in Subpart Db. Since the boiler was constructed after January 1, 1972 and has a heat input capacity of greater than 10 million BTU per hour but less than 250 million BTU per hour, the boiler is limited to the following particulate matter emission rate:

$$P = 0.5 (10/R)^{0.5} \text{ pounds per million BTU heat input}$$

Where:

P = allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input.

R = heat input of fuel-burning equipment in million BTU per hour

- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur dioxide and sulfur content limits are subsumed by the limits in Subpart Db.

4. Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) each have a 453 million BTU per hour heat input (operational maximum – 28.6 MW) and is capable of firing natural gas and No. 2 fuel oil. They are subject to the following rules and regulations:

- 40 CFR 52.21 – The facility accepted a sulfur content limit in the fuel of 0.5 percent in their 1985 PSD application in order to meet the requirements in BACT.
- 40 CFR 60 Subpart GG – “Standards of Performance for Stationary Gas Turbines.” The turbines were constructed, modified, or reconstructed after October 3, 1977 and each has a heat input at peak load greater than 10 million BTU per hour. According to §60.332(d), stationary gas turbine with a manufacturer’s rated base load at ISO conditions of 30 MW or less shall comply with the nitrogen oxides emissions limit of:

$$\text{STD} = 0.0150 (14.4/Y) + F$$

Where:

STD = allowable NO<sub>x</sub> emissions (percent by volume at 15 percent oxygen and on a dry basis)

Y = manufacturer’s rated heat rate at manufacturer’s rates peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO<sub>x</sub> emission allowable for fuel-bound nitrogen as defined in §60.332(a)(3).

Subpart GG also limits the SO<sub>2</sub> emissions to 0.015 percent by volume at 15 percent oxygen on a dry basis, or limits the sulfur content in the fuel burned to 0.8 percent, by weight. However, the facility accepted a sulfur content limit in the fuel combusted in the turbines of 0.5 percent in their 1985 PSD application in order to meet the requirements in BACT. This BACT limit subsumes the Subpart GG limit.

- Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions.” It has been determined that Georgia Rule 391-3-1-.02(2)(d) – “Fuel Burning Equipment” was not intended to apply to combustion turbines and that this equipment should not be classified as “fuel burning equipment.” However, since the waste heat boilers (see below) are subject to Georgia Rule 391-3-1-.02(2)(d) – “Fuel Burning Equipment” and the combustion turbines vent directly to the waste heat boilers, the combustion turbines are subject to the opacity to 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur dioxide and sulfur content limits are subsumed by the BACT limit.

5. Waste Heat Recovery Boilers (Source Codes: WH01 and WH02) are boilers whose heat input comes from the combustion turbines and supplemental duct burners. The waste heat boilers are not subject to 40 CFR 60 Subpart Dc since they were constructed before June 9, 1989 and the heat input capacity of the duct burners is 80 million BTU per hour. They are subject to the following rules and regulations:

- 40 CFR 52.21 – The facility accepted a sulfur content limit in the fuel of 0.5 percent in their 1985 PSD application in order to meet the requirements in BACT.
- Georgia Rule 391-3-1-.02(2)(d) – “Fuel Burning Equipment.” This rule limits the opacity to 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. It also limits the fly ash and/or other particulate matter emissions to the following equation.

$$P = 0.5 (10/R)^{0.5} \text{ pounds per million BTU heat input}$$

Where:

P = allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input.

R = heat input of fuel-burning equipment in million BTU per hour

- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur content limit is subsumed by the BACT limit.
6. Paper Machines Nos. 16-20 (Source Codes: PM01 through PM05) operate on either natural gas or a combination of natural gas and fuel oil. Paper Machines Nos. 16 and 17 fire natural gas only and have a heat input rate of 64 million BTU per hour. Paper Machines Nos. 18 and 19 fire natural gas only and have a heat input rate of 50 million BTU per hour. Paper Machine No. 20 fired both natural gas and No. 2 fuel oil, with a heat rating of 50 million BTU per hour on natural gas and 70 million BTU per hour on No. 2 fuel oil. The equipment is not subject to Georgia Rule 391-3-1-.02(2)(d) – “Fuel Burning Equipment” since the combustion gases come into contact with the process. Therefore, they are subject to Georgia Rules (b) and (e). They are subject to the following rules and regulations:
- 40 CFR 52.21 – The facility accepted a sulfur content limit in the fuel of 0.5 percent in their 1985 PSD application in order to meet the requirements in BACT. Also, the No. 20 Paper Machine is limited to burning No. 2 fuel oil for more than 90 calendar days during any twelve-month period. VOC emissions resulting from solvent usage cannot equal or exceed 40 tons during any twelve consecutive month period from Paper Machines Nos. 16-19, or 40 tons during any twelve consecutive month period from Paper Machine No. 20.
  - Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions.” The paper machines are subject to the opacity limit of less than 40 percent.

- Georgia Rule 391-3-1-.02(2)(e) – “Particulate Emissions from Manufacturing Processes.” Since the equipment was constructed after July 2, 1968, the paper machines are each limited to the following particulate matter emission rate:

$$E = 4.1 P^{0.67}; \text{ for process input weight rates up to and including 30 tons per hour}$$

$$E = 55 P^{0.11} - 40; \text{ for process input weight rates above 30 tons per hour}$$

Where:

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide.” The sulfur content limit is subsumed by the BACT limit.
7. Flexographic Printers Nos. 1 –6 (Source Codes: FX01 through FX06). The printers were installed over a period of time from 1986-1998. They are not subject to Georgia Rule (mm) – “VOC Emissions from Graphic Arts Systems” due to the VOC exemption under 391-3-1-.02(2)(a)6(i)(I). They are subject to the following rules and regulations:
    - 40 CFR 63 Subpart KK - “National Emission Standards for the Printing and Publishing Industry.” The facility is subject since it is an existing facility that is a major source for HAP at which wide-web flexographic printing processes are operated. According to §63.821(b)(2), if the facility applies no more than 400 kg per month of organic HAP on wide-web flexographic printing presses, they only must keep record of the total volume and organic HAP content of each material applied each month per §63.829(e). The facility indicated that they were in compliance on the compliance date of May 30, 1999.
  8. The Parts Washers (Source Codes: PW01 through PW18) are not subject to Georgia Rule (ff) – “Solvent Metal Cleaning” due to the VOC exemptions under 391-3-1-.02(2)(a)6(i)(I).
  9. The entire facility is limited to one-third of potential electric output capacity that can be sold to any utility power distribution system. This limit is to keep the facility from being considered an electric generation source under the Acid Rain Rules of 40 CFR 72.6 and to keep the circulating fluidized bed boilers from being subject to 40 CFR 60 Subpart Da.

#### D. Compliance Status

The facility has indicated in their Title V permit application that they are in compliance for all equipment.

## E. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario in their Title V permit application.

## F. Permit Conditions

Equipment Emission Caps and Operating Limits

Condition 3.2.1 limits the facility to selling less than one-third of its potential electric output capacity to any utility power distribution system. This is from permit number 2647-051-12420, condition 47. No change was requested by the facility for this condition.

Equipment Federal Rule Standards

Conditions 3.3.1 and 3.3.2 subject the facility to the “General Provisions” required by Subpart A of both 40 CFR 60 and 40 CFR 63. This is from permit number 2647-051-12420, condition 43. No change was requested by the facility for this condition.

Condition 3.3.3 subjects the Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) to 40 CFR 60 Subpart D – “Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971.” This is from permit number 2647-051-12420, condition 45. No change was requested by the facility for this condition.

Condition 3.3.4 subjects the Circulating Fluidized Bed Boiler Nos. 3, 4, and 5 (Source Codes: BO01, BO02, and BO03) and the Package Boiler (Source Code: BO06) to 40 CFR 60 Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” This is from permit number 2647-051-12420, condition 44. No change was requested by the facility for this condition.

Condition 3.3.5 subjects the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) to 40 CFR 60 Subpart GG – “Standards of Performance for Stationary Gas Turbines.” This is from permit number 2647-051-12420, condition 46. No change was requested by the facility for this condition.

Condition 3.3.6 subjects the Flexographic Printers Nos. 1 –6 (Source Codes: FX01 – FX06) to 40 CFR 63 Subpart KK - “National Emission Standards for the Printing and Publishing Industry.” This condition was not in permit number 2647-051-12420 because the compliance date was May 30, 1999, which was almost two years after the permit was issued.

Condition 3.3.7 limits the particulate matter emissions from Circulating Fluidized Bed Boiler Nos. 3, 4 and 5 (Source Codes: BO01, BO02, and BO03) to 0.05 pounds per million BTU heat input. This is from permit number 2647-051-12420, condition 4a. No change was requested by the facility for this condition.

Condition 3.3.8 limits the visible emissions from the Circulating Fluidized Bed Boiler Nos. 3, 4 and 5 (Source Codes: BO01, BO02, and BO03) and the Package Boiler (Source Code: BO06) to twenty (20) percent opacity except for one six-minute period per hour of not more than twenty-seven (27) percent opacity. This is from permit number 2647-051-12420, conditions 4f and 7b. No change was requested by the facility for this condition.

Condition 3.3.9 limits the sulfur dioxide emissions from the Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) to 1.2 pounds per million BTU heat input. This is from permit number 2647-051-12420, condition 4b. No change was requested by the facility for this condition.

Condition 3.3.10 limits the sulfur dioxide emissions from the Circulating Fluidized Bed Boiler Nos. 4 and 5 (Source Codes: BO02 and BO03) to 10 percent of the potential sulfur dioxide emission rate (90 percent reduction) and to the emission limit determined according to the following formula. This is from permit number 2647-051-12420, condition 4c. No change was requested by the facility for this condition.

$$ES = (1.2H_a + 0.8 H_b)/H_a + H_b$$

Where:

ES = SO<sub>2</sub> emission limit in pounds per million BTU heat input  
H<sub>a</sub> = heat input from the combustion of coal in million BTU  
H<sub>b</sub> = heat input from the combustion of fuel oil in million BTU

Condition 3.3.11 requires that the fuel burned in the Package Boiler (Source Code: BO06) shall meet the definition of "very low sulfur oil" of 40 CFR 60.41b. That is an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million BTU heat input. This is from permit number 2647-051-12420, condition 8. No change was requested by the facility for this condition. However, the definition from the old permit was changed to match the definition from 40 CFR 60 Subpart Db.

Condition 3.3.12 limits the nitrogen oxides emissions from the Circulating Fluidized Bed Boiler Nos. 3, 4 and 5 (Source Codes: BO01, BO02, and BO03) to 0.6 pounds per million BTU heat input. This is from permit number 2647-051-12420, condition 4d. No change was requested by the facility for this condition.

Condition 3.3.13 limits the nitrogen oxides emissions from the Package Boiler (Source Code: BO06) to 0.20 pounds per million BTU heat input. This is from permit number 2647-051-12420, condition 7a. No change was requested by the facility for this condition.

Condition 3.3.14 limits the nitrogen oxides emissions from the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) to the following equation. This is from permit number 2647-051-12420, condition 4e. No change was requested by the facility for this condition.

$$\text{STD} = 0.0150 (14.4/Y) + F$$

Where:

STD = allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis)

Y = manufacturer's rated heat rate at manufacturer's rates peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NOx emission allowable for fuel-bound nitrogen as defined in §60.332(a)(3).

Condition 3.3.15 limits the amount of organic hazardous air pollutants (HAP) contained in all inks and solvents used on the Flexographic Printers Nos. 1 –6 (Source Code: FX01 – FX06) to less than 400 kilograms per month. This limit was not included in permit number 2647-051-12420. It was added ensure that the facility meets all applicable requirements of 40 CFR 63 Subpart KK.

Condition 3.3.16 limits the VOC emissions from Paper Machine Nos. 16-19 (Source Codes: PM01-PM04) to 40 tons during any twelve consecutive months, and limits the VOC emissions from Paper Machine No. 20 (Source Code: PM05) to 40 tons during any twelve consecutive months. These are PSD Avoidance limits from permit number 2647-051-12420, condition 6 (both and b). No change was requested by the facility for this condition.

Condition 3.3.17 limits the Package Boiler (Source Code: BO06) to the following emissions. These are PSD Avoidance limits from permit number 2647-051-12420, conditions 7c, 7d, and 7e. No change was requested by the facility for this condition.

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

Condition 3.3.18 limits the total operating time of the Package Boiler (Source Code: BO06) to 2,200 hours during any consecutive twelve-month period, but no more than 900 hours during any consecutive twelve-month period while burning No. 2 fuel oil. These are PSD Avoidance limits from permit number 2647-051-12420, conditions 48 and 49. No change was requested by the facility for this condition.

Condition 3.3.19 limits the sulfur content in the fuel oil burned in the Paper Machine Dryers Nos. 16-20 (Source Codes: PM01 – PM05), the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02), and the Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02) to 0.5 percent sulfur. This is a limit established in the 1985 PSD review to meet BACT requirements from permit number 2647-051-12420, condition 9. No change was requested by the facility for this condition.

Condition 3.3.20 limits the burning of No.2 fuel oil in the Paper Machine No. 20 (Source Code: PM05) to no more than 90 calendar days during any consecutive twelve-month period. This is a PSD Avoidance limit from permit number 2647-051-12420, condition 36. No change was requested by the facility for this condition.

#### Equipment SIP Rule Standards

Condition 3.4.1 limits the amount of tire-derived fuel to be burned in each of the Circulating Fluidized Bed Boiler Nos. 3 and 5 (Source Codes: BO01 and BO03) to 3.5 tons per hour. This limit was established during testing of the BO01 boiler in May 1991, where the boiler was able to comply with the NO<sub>x</sub>, SO<sub>2</sub>, PM and opacity limits in the permit. This is from permit number 2647-051-12420, condition 5. No change was requested by the facility for this condition.

Condition 3.4.2 limits the Circulating Fluidized Bed Boiler Nos. 3 and 5 (Source Codes: BO01 and BO03) to burning coal, petroleum coke, peat, wood, plant and office waste, fuel oil, natural gas, and tire derived fuel (TDF). This was not included in permit number 2647-051-12420, but was provided by the facility in their Title V permit application (Section 5.10).

Condition 3.4.3 limits the Circulating Fluidized Bed Boiler No. 4 (Source Code: BO02) to burning only coal, petroleum coke, peat, wood, plant and office waste, fuel oil, and natural gas. This was not included in permit number 2647-051-12420, but was provided by the facility in their Title V permit application (Section 5.10).

Condition 3.4.4 limits the Package Boiler (Source Code: BO06), the Paper Machine's dryers (Source Codes: PM01 through PM05), the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02), and the Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02) to burning only natural gas and No. 2 fuel oil. This was not included in permit number 2647-051-12420, but was provided by the facility in their Title V permit application (Section 5.10).

Condition 3.4.5 limits the opacity from the Paper Machine's dryers (Source Codes: PM01 through PM05) to forty (40) percent opacity. This was not included in permit number 2647-051-12420, but was added to ensure compliance with Georgia Rule (b) – "Visible Emissions".

Condition 3.4.6 limits the particulate matter emissions from the Package Boiler (Source Code: BO06), the Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02) to the following equation. This was not included in permit number 2647-051-12420, but was added to ensure compliance with Georgia Rule (d).

$$P = 0.5 (10/R)^{0.5} \text{ pounds per million BTU heat input}$$

Where:

P = allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input.

R = heat input of fuel-burning equipment in million BTU per hour

Condition 3.4.7 limits the visible emissions from the combined stacks of the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) and Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02) to twenty (20) percent opacity except for one six-minute period per hour of not more than twenty-seven (27) percent opacity. This was not included in permit number 2647-051-12420, but was added to ensure compliance with Georgia Rule (d) – “Fuel-burning Equipment”.

Condition 3.4.8 limits the particulate matter emissions from the Paper Machine dryers (Source Codes: PM01 through PM05) to the following equations. This was not included in permit number 2647-051-12420, but was added to ensure compliance with Georgia Rule (e).

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour.}$$

$$E = 55P^{0.11} - 40; \text{ for process input weight above 30 tons per hour.}$$

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

#### Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Condition 3.5.1 limits the emissions of chlorine from the Brine Dechlorinator Scrubber (Source Code: CA20) to 42 parts per million. This limit is set per the Georgia Air Toxic Guidelines and is from permit number 2647-051-12420, condition 4g. The limit was changed from 10 milligrams per second to 42 parts per million. No change was requested by the facility for this condition.

Condition 3.5.2 limits the emissions of chlorine from the Absorber/Bleach Tanks Scrubber (Source Code: CA21) to 8.5 parts per million. This limit is set per the Georgia Air Toxic Guidelines and is from permit number 2647-051-12420, condition 4h. The limit was changed from 2.4 milligrams per second to 8.5 parts per million. No change was requested by the facility for this condition.

**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 the EPD to determine compliance with the emission limits contained in section 3.0. The Permit does specify in condition 4.1.3 the applicable test method that would apply. A general condition to require notification of any test and for the submission of a test plan is included.

**B. Specific Testing Requirements and Compliance Procedures**

The initial performance test required by 40 CFR 60.8 and the current Air Quality Permit (number 2647-051-12420) have been completed for all existing equipment. This Permit allows certain changes to be made to the facility without permit revision. These changes may include the installation of new equipment and replacement of existing equipment. If these changes are made, a condition is present to require the initial performance test to be performed in accordance with 40 CFR 60.8 and the applicable subpart.

Condition 4.2.1 requires a performance test to be conducted on the Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) for the determination of the nitrogen oxides emission rate and an associated outlet combustor outlet temperature that is representative of operation below the allowable emission rates.

Circulating Fluidized Bed Boiler Nos. 4 and 5 (Source Codes: BO02 and BO03) are subject to 40 CFR 60 Subpart Db for sulfur dioxide and nitrogen oxides emission limitations, while Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) is only subject to 40 CFR 60 Subpart Db nitrogen oxides limitations. Conditions 4.2.2 and 4.2.3 require that the Continuous Emissions Monitoring Systems (CEMS), required to be installed by the Permit, are to be used to determine compliance on a continuous basis with the emissions limitations through the use of 30-day rolling averages. The Package Boiler is subject to the emissions testing requirement contained in 40 CFR 60 Subpart Db for determining compliance with the application nitrogen oxides emission limitation and compliance on a continuous basis is not required. However, per Condition 4.2.4, the Permittee must, when requested by the Division, conduct a 30-day emissions test to determine compliance with the nitrogen oxide limitation using the Continuous monitoring System required to be installed by Condition 5.2.1.

Condition 4.2.5 defines a steam generating unit operating day according to 40 CFR 60 Subpart Db.

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

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

**B. Specific Monitoring Requirements**

40 CFR 60 Subpart Db requires that a Continuous Opacity Monitoring System (COMS) be installed on Circulating Fluidized Bed Boiler Nos. 3, 4, and 5 (Source Codes: BO01, BO02, and BO03), and on the Package Boiler (Source Code: BO06) while burning fuel oil. The COMS have previously been installed on the boilers and tested according to Performance Specification 1. A determination was made that the COMS could be used to ensure compliance with the particulate matter standards and that no additional monitoring would be required for particulate matter. Proper operation of control equipment is necessary to ensure compliance with the particulate matter standard. The US Environmental Protection Agency, in developing New Source Performance Standards for fossil fuel fired steam generators, established opacity as a surrogate for particulate matter and stipulated a 6-minute average opacity of 20 percent as appropriate for assuring good and proper operation of control equipment. Therefore, reliance on the COMS is considered adequate to ensure compliance with the particulate matter and opacity standards for the Db boilers.

Similarly, CEMS are also required by 40 CFR 60 Subpart Db for the monitoring of nitrogen oxides and sulfur dioxide emissions (and diluent) for Circulating Fluidized Bed Boiler Nos. 4 and 5 (Source Codes: BO02 and BO03) and Package Boiler (Source Code: BO06). Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01) is subject to 40 CFR 60 Subpart D for sulfur dioxide and 40 CFR 60 Subpart Db for nitrogen oxides and is monitored accordingly. A CEMS is also required by 40 CFR 60 Subpart D for the monitoring of sulfur dioxide emissions for Circulating Fluidized Bed Boiler No. 3 (Source Code: BO01). These systems have also been previously installed on Circulating Fluidized Bed Boiler Nos. 3, 4, and 5 (Source Codes: BO01, BO02, and BO03) according to the relevant Performance Specification, including oxygen monitors for the diluent. Circulating Fluidized Bed Boiler Nos. 4 and 5 (Source Codes: BO02 and BO03) are also required by 40 CFR 60 Subpart Db to collect fuel samples for sulfur analysis by Method 19 to calculate average sulfur dioxide input rate. 40 CFR 60 Subpart Db does allow the use of a Predictive Emissions Monitoring System (PEMS) for nitrogen oxides emissions monitoring with the approval of EPA. A PEMS was approved by EPA in a letter to James Johnston dated November 7, 1991 for use on the Package Boiler (Source Code: BO06). All monitoring systems satisfy the monitoring requirements of 40 CFR 60 Subparts D or Db and are, as of this time, the most stringent form of monitoring. Therefore, no additional monitoring will be required. Monitor downtime and deviations from the standard are presently reported quarterly.

The Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02), the associated Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02), and the Paper Machine Dryers Nos. 16-20 (Source Codes: PM01 through PM05) are limited to burning only natural gas and No. 2 fuel oil by permit Condition 3.4.4. The firing of natural gas and No. 2 fuel oil is not expected to result in significant particulate matter or visible emissions from these sources and the likelihood of the allowable emission limits of Georgia Rules (b) for opacity and (d) for opacity and particulate matter from the Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02) being exceeded is very low. Therefore, no monitoring is required for these sources.

All fuel-burning sources are subject to Georgia Rule (g) for sulfur dioxide emissions. All sources burn natural gas and No. 2 fuel oil. Circulating Fluidized Bed Boiler Nos. 3, 4, and 5 (Source Codes: BO01, BO02, and BO03) have the ability to burn a variety of fuels and are monitored continuously for sulfur dioxide emission as required by 40 CFR 60 Subpart D or Db. Therefore these boilers do not require additional monitoring for compliance with Rule (g). Package Boiler (Source Code: BO06), Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02), the associated Waste Heat Recovery Boilers Nos. 1 and 2 (Source Codes: WH01 and WH02), and the Paper Machine Dryers Nos. 16-20 (Source Codes: PM01 through PM05) all burn natural gas and fuel oil. Natural gas is a processed fuel (cleaned) which has a negligible amount of sulfur. The permit limits the fuel oil fired in all fuel burning equipment to No. 1 or No. 2 fuel oil which is limited to a sulfur content of 0.5 percent by weight. This limitation is more stringent than the Georgia Rule (g) sulfur limit and will be monitored by fuel supplier certifications, which the Permittee is required to obtain from the fuel oil supplier. Therefore no monitoring additional monitoring is required for those sources burning only natural gas and fuel oil.

The Package Boiler (Source Code: BO06) is limited by Condition 3.3.17 to twelve consecutive month limits for particulate matter, sulfur dioxide, and nitrogen oxides. Condition 3.3.18 limits the hours of operation of the boiler to assure compliance with the yearly limits. Condition 5.2.2.a requires the monitoring of hours of operation of the boiler to assure compliance with these limits. Operation of the boiler exceeding the limits in terms of tons per year of hours of operation are to be reported quarterly as exceedences.

The Combustion Turbines Nos. 1 and 2 (Source Codes: CT01 and CT02) are subject to the nitrogen oxides emission limitations of 40 CFR 60 Subpart GG. Condition 5.2.2.b requires combustor outlet temperature monitoring based on temperatures determined during a required nitrogen oxide performance test that indicated compliance with the emissions limit.

The Brine Dechlorinator and Absorber Bleach Tanks are subject to permit Conditions 3.5.1 and 3.5.2 to limit the emission of chlorine into the atmosphere. Condition 5.2.3 requires a continuous monitor for monitoring chlorine concentrations from each source. Each monitor is required to be equipped with an alarm set at a specified limit to reasonable assure operation of each source below the permitted emission limits. Operation of each source above the alarm limits are to be recorded as excursions and are to be reported as part of the quarterly emission reports. This is from permit number 2647-051-12420, condition 20. No change was requested by the facility.

C. Record keeping and Reporting Requirements

Records, as required by 40 CFR 60 Subpart Db, including exceedances from the nitrogen oxide standards and excesses of the sulfur dioxide standards, are required to be kept by the Permittee and the reporting is required on a quarterly basis.

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

A. General Record Keeping and Reporting Requirements

Section 6.1 of the Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and the prompt reporting of all related information to deviations from applicable requirements. The submission of quarterly reports of any failure to meet an applicable emission limit and/or any failure to comply with or complete any work practice or standard contained in this permit is also required. Condition 6.1.7 requires the Permittee to report any excess emissions, exceedances, or excursions as defined by this condition for each reporting period.

B. Specific Record Keeping and Reporting Requirements

Section 6.2 of the Permit contains specific record keeping requirements for fuel supplier certification, fuel usages and hours of operations for the specified sources, sulfur content of natural gas, and usage records and calculations of VOC emissions. The submissions of quarterly reports for the Package Boiler (Source Code: BO06) and the Paper Machine No. 20 (Source Code: PM05) are specified. This section also includes a requirement to immediately report any VOC usage that exceeds the specified emission limitations specified in Parts 3.3 and 3.4 of the Permit.

Conditions 6.2.9 and 6.2.10 require the facility to calculate the VOC emissions from all materials. These PSD avoidance limits are from permit number 2647-051-12420, conditions 33, 34, and 35. No change was requested by the facility.

Condition 6.2.11 requires the facility to maintain records of any utility power that is sold in order to prove compliance with the limit in Condition 3.2.1.

**VII. Specific Requirements**

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Not Applicable



**INSIGNIFICANT ACTIVITIES CHECKLIST**

<b>Category</b>	<b>Description of Insignificant Activity/Unit</b>	<b>Quantity</b>
	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.	1
<b>Industrial Operations</b>	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: <ul style="list-style-type: none"> <li>i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.</li> <li>ii) Porcelain enameling furnaces or porcelain enameling drying ovens.</li> <li>iii) Kilns for firing ceramic ware.</li> <li>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.</li> <li>v) Bakery ovens and confection cookers.</li> </ul>	
	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: <ul style="list-style-type: none"> <li>i) Activity is performed indoors; &amp;</li> <li>ii) No significant fugitive particulate emissions enter the environment; &amp;</li> <li>iii) No visible emissions enter the outdoor atmosphere.</li> </ul>	N/A
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	1
	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.	28
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	16
	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.	

<b>Category</b>	<b>Description of Insignificant Activity/Unit</b>	<b>Quantity</b>
<b>Storage Tanks and Equipment</b>	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.	3
	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.	

**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.	1
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	>150
	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).	4

## D. Temporary Sources

Not Applicable

## E. Short-Term Activities

Not Applicable

## F. Compliance Schedule/Progress Reports

Not Applicable

## G. Emissions Trading

Not Applicable

## H. Acid Rain Requirements

Not Applicable

## I. Prevention of Accidental Releases

The facility is subject to the Accidental Release Prevention Program due to having propane at or above the threshold of 10,000 pounds.

## J. Stratospheric Ozone Protection Requirements

Not Applicable

## K. Pollution Prevention

Not Applicable

## L. Specific Conditions

Not Applicable



## Addendum to Narrative

EPD issued draft Title V Permit 2621-103-0007-V-01-0 for Fort James Savannah River Mill in Rincon, Georgia on June 5, 2001. The public notice for this permit was published in The Effingham Herald on June 28, 2001. The public comment period expired July 29, 2001. Comments were received from Fort James Savannah River Mill on July 30, 2001; however, no comments were received from EPA. At the request of the Division, the facility submitted additional information needed to make corrections to the permit; these were received from Michelle Liotta, Technical/Environmental Engineer, on September 5, 2001. The comments are summarized below followed by a discussion of the comment and any changes made to the permit as a result. Additions to conditions are underlined, and deletions are in ~~double strikethrough~~.

### COMMENTS FROM THE FACILITY

1. The facility requested multiple changes to the Overall Facility Process Description (Section 1.3 of the Permit).

RESPONSE: EPD has updated the permit in reference to these comments.

2. The facility requested a definition for "plant and office waste." They assumed it to mean actual waste generated by the mill manufacturing process and on-site offices, including, but not limited to, paper, used oil, oily rags, spent oil dry, wastewater sludge, wood, etc. Further information from the facility revealed that they did not incinerate used oil or wastewater sludge in the boilers, which would have subjected the boilers to additional rules and regulations.

RESPONSE: There is no official definition for "plant and office waste." The facility provided EPD that specific fuel type in their application and therefore, it falls upon them to define it. However, used oil, oily rags, spent dry oil, and wastewater sludge could possibly trigger additional rules and regulations. Wood is already covered in the application. The application states that "plant and office waste" has a maximum hourly fuel consumption of 6.0 tons/hour/boiler, with a maximum heat input of 102 MMBTU/hour/boiler and a maximum heating value of 8.5 KBTU/hour/boiler. Since the facility is required to determine the definition of "plant and office waste" and since this was not an original permit requirement, the phrase will be removed from Conditions 3.4.2 and 3.4.3 and the Process Description. If the facility acceptably defines "plant and office waste," the permit can be modified in the future to include those materials.

3. The facility commented that the BO02 boiler (Boiler #4) is not a circulating fluidized bed boiler. It is a fluidized bed boiler.

RESPONSE: The facility submitted a page for Section 5.10 to update the description of the boiler in the application. EPD has updated the permit in reference to these comments.

4. The facility stated that equipment FL02 was removed from the mill and needs to be deleted.

RESPONSE: The facility submitted a letter stating that this equipment was removed from the site. EPD has updated the permit in reference to these comments.

5. The facility commented that the opacity limit in Condition 3.3.8 only applies to the package boiler when it is burning fuel oil. They requested that the Division clarify that condition by adding “(when burning fuel oil)” after “(Source Code: BO06)”.

RESPONSE: The condition will remain unchanged, as the condition is repeated from the rule as stated in 40 CFR 60.43b(f) and is applicable at all times. For clarification, Georgia Rule 391-3-1-.02(2)(d) applies for periods when the boiler is firing natural gas, which has the same opacity limits as 40 CFR 60 Subpart Db.

6. The facility stated that Condition 3.3.9 does not address that the SO<sub>2</sub> limit is based on a three-hour rolling average.

RESPONSE: Condition 6.1.7.a.ii states that the excess emissions for sulfur dioxide on the No. 3 Circulated Fluidized Bed Boiler are based on a three-hour period. The three-hour period is not defined in either 40 CFR 60.43(a)(2) or 391-3-1-.02(2)(g)1(ii), which are the basis for Condition 3.3.9; therefore, condition 3.3.9 will remain unchanged.

7. The facility requests to add the word “oil” after “fuel” in Condition 3.3.11 – “All fuel oil burned in the Package Boiler (Source Code: BO06) shall meet the definition of “very low sulfur oil” of 40 CFR 60.41b.”

RESPONSE: EPD has updated the permit in reference to these comments.

8. The facility stated that Conditions 3.3.10, 3.3.12, and 3.3.13 do not address that the emission limits are based on a 30-day rolling average.

RESPONSE: Condition 6.1.7.b states that the exceedances for the nitrogen oxide and sulfur dioxide limits in Conditions 3.3.10, 3.3.12, and 3.3.13 are based on a 30-day rolling average period. The 30-day rolling average is not defined in 40 CFR 60.42b(a), 40 CFR 60.44b(a)(3)(ii), or 40 CFR 60.44b(a)(1)(ii), which are the basis for Conditions 3.3.10, 3.3.12, and 3.3.13; therefore, conditions 3.3.10, 3.3.12, and 3.3.13 will remain unchanged.

9. The facility requested that Condition 3.3.15 be changed to “The Permittee shall comply with the provisions of 40 CFR 63.821(b)(2) by ensuring that the amount of organic hazardous air pollutants (HAPs) contained in ~~all inks and solvents used~~ any materials applied to a substrate on the Flexographic Printers Nos. 1–6 (Source Code: FX01 through FX06) is less than 400 kilograms per month. [40 CFR 63.829(e)(2)]”

REPSONSE: EPD has reviewed the requirements of 40 CFR 63 Subpart KK and determined that a more appropriate phrase would be “all materials used.” Also, the reference of 40 CFR 63.822(b)(2) was erroneous; 40 CFR 63.821(b)(2) is correct. Condition 3.3.15 has been updated to reflect these corrections.

10. The facility requested that Condition 3.3.16 be changed to “The Permittee shall not discharge or cause the discharge into the atmosphere volatile organic compound (VOC) emissions resulting from cleaning solvent usage in an amount equal to or exceeding 40 tons during any twelve consecutive months from Paper Machine Nos. 16-19 (Source Codes: PM01 through PM04) and pulping process area (Source Code: SC15) and 40 tons during any twelve consecutive months from Paper Machine No. 20 (Source Code: PM05).”

RESPONSE: EPD agrees that the pulping process area was inadvertently left out of the condition and will be added to Condition 3.3.16. However, the word "cleaning" cannot be added, as is a PSD avoidance condition from the previous permit and cannot be changed without a PSD look back review.

11. The facility commented that Paper Machines Nos. 16 through 19 are not capable of burning fuel oil; therefore, they should be removed from Condition 3.3.19.

RESPONSE: EPD has updated the permit in reference to these comments.

12. The facility proposed that the limit in Condition 3.3.20 be changed to 2,160 hours of burning fuel oil from 90 calendar days.

RESPONSE: The 90 day limit was originally proposed by the facility during the addition of the No. 20 paper machine. In a memo dated November 9, 1996 Jack Taylor's calculations for avoiding PSD were based on a 24-hour day. Therefore, 90 calendar days and 2,160 hours should be synonymous. EPD has updated Conditions 3.3.20 and 6.1.7.c.iii in reference to these comments.

13. The facility stated that they have no means to measure tire derived fuel on an hourly basis, and would like a longer-term standard for Conditions 3.4.1, 6.1.7.b.v, and 6.2.4.

RESPONSE: The facility must send in a request and supporting documentation to change this limit and it will be handed outside of this permit issuance. Conditions 3.4.1, 6.1.7.b.v, and 6.2.4 will remain unchanged.

14. In Condition 3.4.7, the Nos. 1 combustion turbine and waste heat boiler are one unit. Likewise, Nos. 2 combustion turbine and waste heat boiler are one unit.

RESPONSE: EPD has updated the permit in reference to these comments.

15. The facility requested corrections to Conditions 3.5.1 and 3.5.2. The limits of "42 parts per million" and "8.5 parts per million" were not in the previous permit.

RESPONSE: The facility is correct; in the previous permit, these limits were listed as 10 mg/s and 2.4 mg/s. However, since the facility cannot comply with a mass flowrate limit, the limits were converted to parts per million, which is the measurement the facility uses to set the chlorine alarms. The limits cannot be deleted either, as they are based on a Toxic Impact Assessment. However, it is acknowledged that 8.5 is erroneous; the limit should be 10 parts per million. Conditions 3.5.2 and 6.1.7.c.vi will be updated to reflect this change.

16. The facility requested a minimum operating time for the continuous opacity monitoring system on the package boiler (as required by Condition 5.2.1.b), since it is used as a backup boiler and thus used infrequently. It is periodically started up for brief testing periods without any intention of operating the unit for the mill's use. They request a minimum operating time below which they would not be required to run the COMS or other monitoring system and keep associated records of monitor operability, etc. They propose a trigger point of 4 hours operating time on fuel oil before such obligations become applicable.

RESPONSE: EPD cannot set a minimum operating time for the boiler. Per 40 CFR 60.46b(a), the only exemptions for opacity are during periods of startup, shutdown, and malfunction. Condition 5.2.1.b remains unchanged.

17. The facility requested a definition of “at approximately 12-month intervals” in Condition 5.2.1e. They recommend changing this reference to agree with 40 CFR 60 Appendix F.

REPSONSE: The phrase “at approximately 12-month intervals” refers to the interval between required Relative Accuracy Test Audits for the Continuous Monitoring System required for the Package Boiler. For the purpose of clarifying when Relative Accuracy Test Audits (RATAs) are required for the Continuous Monitoring System, Condition 5.2.1e will be revised to the following:

In accordance with 40 CFR 60.48b(g)(1), a Continuous Monitoring System (CMS) for the measurement of nitrogen oxide emissions from the Package Boiler (Source Code: BO06). ~~At approximately 12-month intervals,~~ A Relative Accuracy Test Audit (RATA) shall be conducted on the nitrogen oxide CMS at least every four successive operating quarters. ~~using~~ The procedures of Performance Specification 2 of the Division’s **Procedures for Testing and Monitoring Sources of Air Pollutants** shall be used to conduct the RATA. Results of the RATA shall be submitted to the Division within 30 days of completion of the RATA.

In lieu of the Continuous Monitoring System required in 40 CFR 60.48b(g)(1), the Permittee may install, in accordance with the requirements of 40 CFR 60.48b(g)(2), a Predictive Emissions Monitoring System (PEMS) ~~to~~ predict nitrogen oxide emission rates. The output of the ~~predictive CMS~~ PEMS shall be in terms of pounds nitrogen oxide per million BTU. ~~At approximately 12-month intervals,~~ A Relative Accuracy Test Audit (RATA) shall be conducted on the ~~nitrogen oxide CMS~~ PEMS at least every four successive operating quarters. ~~using~~ The procedures of Performance Specification 2 of the Division’s **Procedures for Testing and Monitoring Sources of Air Pollutants** shall be used to conduct the RATA. The first RATA shall be conducted with 180 days of the date of issuance of this permit. Results of the RATA shall be submitted to the Division within 30 days of completion of the RATA

18. Condition 5.2.7 requires quarterly accuracy audits on all CEMS installed at the facility, with the exception of the BO01 boiler (boiler #3) SO<sub>2</sub> monitor. They understand that the chlorine monitors would also be excluded from this requirement, and want them listed as excluded in this condition.

REPSONSE: The chlorine monitors are not considered to be continuous emission monitors; therefore, they are excluded by definition. Condition 5.2.7 remains unchanged.

19. The facility requests that “pet coke” be added to the list of fuels in Condition 5.3.2.e.

REPSONSE: Per 40 CFR 60.49b(k)(4), pet coke is not listed in the rule; therefore, Condition 5.3.2.e will remain unchanged. Per 40 CFR 60.41b, the definition of coal includes petroleum coke.

20. The facility requests clarification that required records per Conditions 6.1.1 and 6.1.6 can be kept via computer provided that can be pulled up and printed upon request.

RESPONSE: EPD finds this acceptable. However, should the computer records become inaccessible, the facility would need to provide proof of compliance in some other manner.

21. The facility requests to change Condition 6.1.7.b.vi - “Any occurrence where more than 400 kilograms per month of organic HAP is ~~used~~ applied to a substrate in the Flexographic Printers Nos. 1-6 (Source Codes: FX01 through FX06).”

RESPONSE: The condition must cover any organic HAP material used; therefore, Condition 6.1.7.b.vi will remain unchanged.

22. The facility requests to add the word “oil” after “fuel” in Condition 6.1.7.b.vii - “Any use of fuel oil that does not meet the definition of “very low sulfur oil” in the Package Boiler (Source Code: BO06).”

RESPONSE: EPD has updated the permit in reference to these comments.

23. The facility requests to delete the reference to Condition 3.3.15 in Condition 6.1.7.b.viii.

RESPONSE: EPD has updated the permit in reference to these comments.

24. The facility requests a change in Condition 6.2.8 to correct an error – “The report shall be submitted with the quarterly report required by Condition 6.1.4 and shall consist of three 12-consecutive month totals (a total for each month in the reporting period) of ~~the all~~ all the days for which the Paper Machine No. 20 (Source Code: PM05) operated while burning No. 2 fuel oil during the reporting period.”

RESPONSE: EPD has updated the permit in reference to these comments.

25. In Condition 6.2.9, the facility requested that the records for organic HAP from the Nos. 1-6 flexographic printers be a separate requirement for the VOC records from the Nos. 16-19 and No. 20 paper machines.

RESPONSE: A new Condition 6.2.12 will be added to Section 6.2 of the permit for the recordkeeping requirements for organic HAP from the Nos. 1-6 flexographic printers. All references to organic HAP and the Nos. 1-6 flexographic printers will be removed from Condition 6.2.9. Also, per the changes to Condition 3.3.16, the pulp processing area will be added to this condition.

26. The facility requests to delete the reference to Condition 3.3.15 in Condition 6.2.10.

RESPONSE: EPD has updated the permit in reference to these comments.

27. The facility requested that EPD include a table or other list of non-applicable requirements as provided in the permit shield regulation 391-3-1-.03(10)6(i)(II) [should be 391-3-1-.03(10)(d)6(i)(II)] and as requested in the mill’s original request for a permit shield, dated October 18, 1996, in order that the shield cover potentially-applicable requirements that have been explicitly determined to be non-applicable.

RESPONSE: Such declarations of non-applicability are not necessary to provide the permit shield afforded in 391-3-1-.03(10)(d)6. If an applicable requirement does not appear in a Title V Permit, the source is not required to comply with that applicable requirement as long as information necessary to determine applicability or non-applicability to that requirement was correctly submitted in the Title application. No change will be made to the permit.

28. The facility assumes that it will not be required to modify or reopen the permit to update the attachments if it adds one or more listed insignificant units or makes some immaterial change in its use of such insignificant units (i.e. changing a parts washer vendor). They request that the permit confirm this, in a statement added to either Section 7.4 or to Attachment B itself. They are willing to commit to update the list of such units upon each permit renewal. They also assume that the mill would not need to modify or reopen the permit during its term if they remove or shutdown a source of piece of operating equipment.

RESPONSE: These types of changes are considered off-permit changes and are addressed in Condition 7.2.1. Further information regarding off-permit changes (and other permit changes) can be found at the Georgia Air Branch website [www.air.dnr.state.ga.us/sspp](http://www.air.dnr.state.ga.us/sspp).

29. The facility stated that there were two units that need to be included in the "Fuel Burning Equipment" section of Attachment B. Also, the "Generic Emissions Grouping" section of Attachment B needed to be updated.

RESPONSE: EPD has updated the permit in reference to these comments.

30. The facility requests clarification on the applicability of NCASI Technical Bulletin 520; specifically, on whether it is be used on a compliance demonstration basis only, and if so, at what frequency.

RESPONSE: NCASI Technical Bulletin 520 contains the procedures for conducting performance tests to determine chlorine concentration. This is the method that the Division prescribes for determining chlorine emissions. The draft permit does not requires that the Chlor-Alkali Plant be tested for chlorine emissions; however, Condition 4.1.1 states that the Division may direct the Permittee to conduct a performance test at any specific emissions point. Should the Division, at some point, find that a performance test is needed to determine chlorine emissions from an emissions unit, the procedures of NCASI Technical Bulletin 520 will be required for the testing.

31. The facility requests approval to use surrogate parameters to verify compliance with the chlorine gas emission requirements. They propose to use the product caustic flow as the surrogate. They could use NCASI Technical Bulletin 520 to demonstrate compliance and to determine the caustic flow rate needed to maintain compliance. They feel that the caustic flow rate is much more reliable than the chlorine monitors. They propose to perform quarterly calibrations of the caustic flow meter.

RESPONSE: EPD requested on August 13, 2001 by phone that the facility submit additional information to justify the use of surrogate parameters and to elaborate why their current chlorine monitors were unacceptable. The facility has not yet submitted this information, therefore, the request is denied. Should the facility wish to pursue this issue in the future, it will be handled as a permit amendment outside this permit issuance.

32. In reviewing the facility's emissions for purposes of confirming previous emission estimates and assuring themselves that the draft Title V permit accurately reflects the application and other available information at the time it was submitted, they have reviewed the types and amounts of materials used during 2000 in connection with the papermaking processes. The facility has questions about the VOC emission assumptions they should be using and whether certain additional VOC emissions associated with the tissue machines should be included within the Title V permit or in new source permitting contexts. They request a meeting to discuss this with EPD.

RESPONSE: Emissions estimates contained within the application only need to be as accurate as necessary for the purpose of determining applicability with air quality rules and regulations. Also, the emission estimates provided in Section 2.20 of the Title V application are for information purposes only and are not binding. If the company believes that there is an issues related to emissions from the tissue machines, that information should be submitted separately and will be handed outside of this permit issuance. If after review of that information, the Division believes that other action is necessary, it will be handled as the Division deems appropriate. No meeting is necessary at this time.

### **ADDITIONAL CHANGES**

1. Due to changes in the Title V Permit template since this permit was issued in draft format, Section 7.10 and Condition 8.2.1 were replaced by newer language
2. The reference for Conditions 3.2.1 and 6.2.11 was wrong in the draft permit. It previously read "[40 CFR 72.6(b)(4) and Avoidance of 40 CFR 60 Subpart Da]". It now reads "[Avoidance of 40 CFR 60 Subpart Da and 40 CFR 72.6(b)(4)]".
3. "40 CFR 52.21 Avoidance" was removed as an applicable requirement/standard in Table 3.1 for the package boiler as this is not appropriate.