

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Packaging Corporation of America**

City: Clyattville

County: Lowndes

AIRS #: 04-13-185-00001

Application #: 14770

Date Title V Application Received: October 14, 2003

Permit No: 2631-185-0001-V-01-2

Program	Review Engineers	Review Managers
SSPP	Brian Gregory	Heather Abrams
SSCP	None	Douglas Waldron
ISMP	Ross Winne	Richard Taylor

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2631-185-0001-V-01-0	July 16, 2002	Y	
2631-185-0001-V-01-1	November 23, 2003	Y	

Table 2: Comments on Specific Permits

Permit Number	Comments
2631-185-0001-V-01-0	Original Title V permit
2631-185-0001-V-01-1	Amendment for the construction and operation of two electrostatic precipitators on the recovery furnaces at the facility

B. Regulatory Status

1. PSD/NSR/RACT

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

Sulfur dioxide emissions from the incineration of Total Reduced Sulfur (TRS) compounds in the NCG Thermal Oxidizer from the LVHC non-condensable gas system, HVLC non-condensable gas system and the foul condensate stripper off gases are limited to 40 tons per 12 consecutive month period.

No. 4 Lime Kiln

- 131.2 tons/12 consecutive months of total particulate matter.
- 119.4 tons/12 consecutive months of PM10.
- 116.7 tons/12 consecutive months of sulfur dioxide.
- 281.3 tons/12 consecutive months of nitrogen oxides.
- 117.4 tons/12 consecutive months of carbon monoxide.
- 81.30 tons/12 consecutive months of volatile organic compounds.

Recovery Furnace No. 1 (Source Code 7000):

- Particulate matter emissions are limited to 68.87 tons/12 consecutive months
- TRS emissions are limited to 13.75 tons/12 consecutive months

Black Liquor Firing Rate is limited to 153,966 tons of black liquor solids per 12 consecutive months

Recovery Furnace No. 3 (Source Code 7020):

Particulate matter (PM) emissions are limited to 25.6 lb/hour

Package Boiler (Source Code 1058)

No.2 Fuel Oil is limited to 950,400 gallons per year

Hours of operation is limited to 2,160 hours per year

No. 3 Smelt Tank (Source Code 7025)

Particulate matter emissions are limited to 13.7 lb/hour

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	Yes	✓		
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

Amendment No. 2631-185-0001-V-01-1 issued a permit to the facility for the construction and modification of the electrostatic precipitators on the No.2 and No.3 Recovery Furnaces.

The description for the modification of the new electrostatic precipitator, ESP C015-A, said that there were 8 mechanical fields and 16 electrical fields. The facility sent in an updated application that stated the correct configuration and that is 8 mechanical fields and 8 electrical fields in ESP C015-A. So this change has been made in this Amendment.

The facility also requested that the initial performance test be given a deadline of December 1, 2003. Because of the review periods involved in the Minor Modification process, the deadline date is moved back to January 1, 2004. The facility is scheduled to perform the tests in November, and therefore will be in compliance with this condition.

C. PSD/NSR Applicability

The change in the process description and performance test schedule is not applicable to any PSD/NSR regulation.

III. Facility Wide Requirements

A. Emission and Operating Caps

Not applicable.

B. Applicable Rules and Regulations

Not Applicable.

C. Compliance Status

Not Applicable.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

Not Applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

The No. 2 Recovery Furnace particulate matter emissions and opacity is controlled by an 8 mechanical field with 8 electrical fields electrostatic precipitator.

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
7010	No. 2 Recovery Furnace	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)1(i)	4.2.6, 5.2.3, 6.1.7	C013	ESP

C. Equipment & Rule Applicability

None Applicable.

D. Compliance Status

Not Applicable.

E. Operational Flexibility

Not Applicable.

F. Permit Conditions

Not Applicable.

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

The electrostatic precipitator (source code C013) has to be tested by January 1, 2004 for particulate matter emissions and opacity.

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

Not Applicable.

VI. Other Record Keeping and Reporting Requirements

Not Applicable.

VII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

Not Applicable.

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

Not Applicable.

J. Stratospheric Ozone Protection Requirements

Not Applicable.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not Applicable.

Addendum to Narrative

The 45-day EPA review started on December 17, 2003 and ended on January 31, 2004. The Division did not receive any comments.