

Facility Name: **Packaging Corporation of America**
City: Valdosta
County: Lowndes
AIRS Number: 04-13-185-00001
Application #: TV-15344
Date SIP Application Received: n/a
Date Title V Application Received: May 10, 2004
Permit No: 2631-185-0001-V-01-4

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached 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
2631-185-0001-V-01-0	July 16, 2002	x	
2631-185-0001-V-01-1	November 23, 2003	x	
2631-185-0001-V-01-2	February 24, 2004	x	
2631-185-0001-V-01-3	April 21, 2004	x	

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
2631-185-0001-V-01-2	Amendment for change of deadline of required performance test for the redesigned ESP for No. 2 Recovery Furnace. Also to correct description of the new ESP for No. 3 Recovery Furnace.
2631-185-0001-V-01-3	Incorporation of 40 CFR 63 Subpart MM into the permit.

II. Proposed Amendment

A. Description of Amendment

The facility submitted an application requesting clarification of the language in several permit conditions in Permit Amendment Number 2631-185-0001-V-01-3 issued on 4/21/04 for the incorporation of 40 CFR 63 Subpart MM to assure that the permit conditions accurately represent the requirements in Subpart MM.

In particular, the facility requested that the following conditions to be modified:

1. The wording of Condition 6.1.7.c.v. (A) and(B) and Condition 3.3.29.c, which references Condition 6.1.7.c.v. (A) and (B), has inadvertently omitted the specific relief provisions spelled out in 40 CFR 63.864(k)(3). This provision specifically states that for non-opacity monitoring exceedances (e.g Smelt Dissolving Tank scrubber operating parameters) no more than one exceedance will be attributed within any given 24-hour period, regardless of whether or not more than one occurs.

Language regarding this relief provision was included in our submission dated October 15, 2003. This language must be added to 3.3.29 and/or 6.1.7.c.v. (A) and(B) to accurately reflect Subpart MM requirements and avoid confusion for EPD, PCA and the public. This could be accomplished by a change in the language for Condition 3.3.29 to read "... as defined in Condition 6.1.7.c.v (A) and (B), except that for the purpose of determining the number of monitoring exceedances for these sources, no more than one exceedance per unit shall be attributed in any given 24-hour period."

2. The wording of Condition 3.3.29.c. could be construed to be a total of 6 occurrences for all three smelt dissolving tank units combined, rather than 6 occurrences per unit, which is the requirement under Subpart MM . This needs to be clarified so that it is clear that the condition means 6 occurrences per unit, to avoid confusion for EPD, PCA and the public. Inserting the phrase "per unit" to read "...semi-annual period per unit for excess emissions..." would clarify this.

3. Condition 4.2.7 incorrectly references Condition 3.3.29 instead of Condition 3.3.28. The latter is the condition with the PM limitations that would be measured by testing, and 4.2.7 should be corrected accordingly.

4. The language under exceedances was changed in the amended permit to read "Condition 6.1.7.b. i. None". There is an existing Condition 6.1.7.b.i. in the initial Title V permit V-01-0 that has nothing to do with Subpart MM. There are 5 existing conditions under 6.1.7.b., items i - v.

5. Condition 6.2.23.c. regarding "parameter monitoring" should not reference Condition 5.2.1.b for opacity or the recovery furnaces or lime kiln at all. Opacity is a specific monitoring requirement in the rule with specific limits and deviation criteria (35% and 20% respectively), and it is not an "operating monitoring parameter" established by performance test (Reference: 63.864 (a)(2) - (a)(5) and (b)(2) for this distinction). The opacity achieved during a performance test does not affect the opacity standard, nor the level at which a recordable or reportable deviation occurs. This condition as worded imposes a much more stringent definition of deviation and thus much more stringent reporting requirements for opacity than was ever intended by the regulation. This language must be corrected and the reference in 6.2.23 c. to Condition 5.2.1.b and recovery furnaces must be deleted.

If the intent of this condition is, as stated in the Narrative, simply to require maintaining records of the corrective action taken for recovery furnace and lime kiln opacity as required when it exceeds 20% for 10 consecutive 6 minute averages or more per Condition 6.2.21.a, then a condition that is separate from the smelt dissolving tanks is needed to avoid confusion and inadvertent imposition of additional stringency. The deviation and corrective action recordkeeping can be accomplished by adding another subpart to 6.2.23 such as "6.2.23. f. Records of the corrective actions taken as required under Condition 6.2.21.a. shall be maintained, including the date, time, and duration of the incident and the corrective action taken."

6. Condition 6.2.23.e also references "monitoring parameter ranges" for recovery furnaces, smelt dissolving tanks and lime kilns. There are no "monitoring parameter ranges" for the recovery furnaces or lime kilns required under Subpart MM. Only the smelt dissolving tanks at PCA require establishing monitoring parameter ranges under the provisions of 40 CFR63.864(b), which specifically references 63.864(a)(2)-(a)(5), and specifically excludes 63.864(a)(1). Our recovery furnaces and lime kiln are equipped with COMS as required under 63.864(a)(1). For these sources, opacity is the required parameter for continuous compliance monitoring, and the allowable "range" requirements are already explicitly spelled out in the regulation and in condition 5.2.1.b.. This condition must be modified to list

only the smelt dissolving tanks and remove all references to the recovery furnaces and lime kiln, to accurately reflect the applicable requirements and avoid confusion for EPD, PCA and the public.

B. Permit Conditions

The Division agrees with all points made by PCA and therefore the following permit conditions are added or modified:

Condition 3.3.29.c is modified to read: " Six occurrences in a semi-annual period per unit for excess emissions from No. 1, 2, or 3 Smelt Tank (Source Codes 7005, 7015, and 7025) as defined in Conditions 6.1.7.c.v(A) and (B), except for the purpose of determining the number of exceedances for these sources, no more than one exceedance per unit will be attributed in any given 24-hr period".

Condition 4.2.7 is modified to correctly reference Condition 3.3.28 instead of 3.3.29.

Condition 6.1.7.b is modified by inserting the original five conditions (i through v) as specified in the original permit to avoid any confusion and to verify that the original conditions remain in PCA's Title V Permit.

Condition 6.2.23.c and e are modified to remove any references to the recovery furnaces and the lime kiln. The Division concurs with PCA that opacity is not an operating parameter. Therefore, parameter monitoring data are only required for the smelt dissolving tank scrubbers. Record keeping requirement for Recovery Furnaces No. 1, 2, and 3 as stated in Condition 6.2.23.c is deleted and moved to new condition 6.2.23.f.

Condition 6.2.23.f is a new condition that requires the company to maintain records of deviation for the recovery furnaces and the lime kiln when the opacity exceeds 20% (as specified in Condition 6.2.21.a), even though "violation" is defined as when opacity exceeds 35% (as specified in Condition 6.1.7.a.viii).