

# 502(b)(10) Permit for Part 70 Source

**Permit Attachment No.:** 2631-185-0001-V-01-A    **Effective Date:** March 4, 2008

**Facility Name:**            **Packaging Corporation of America, Inc.**  
5495 Lake Park-Clyattville Road  
Clyattville, GA 31601 (Lowndes County)

**Mailing Address:**        P.O. Box 1048  
Valdosta, GA 31603

**Parent/Holding Company:**    Packaging Corporation of America, Inc.

**Facility AIRS Number:**    04-13-185-00001

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to or in effect under the Act, the Permittee described above is issued a SIP Construction and Operating Permit for:

The addition of an SO<sub>2</sub> emission limit on the CE Power Boiler (Source Code 1017) for the purposes of improving visibility in the Saint Marks National Wildlife Refuge per EPA's Regional Haze Rule (40 CFR 51.308).

This modification qualifies as a Section 502(b)(10) change to the Part 70 source in accordance with Georgia Air Quality Control Rule 391-3-1-.03(10)(b)(5).

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted or in effect under that Act, or any other condition of this Permit and Permit No. 2631-185-0001-V-01-0. Unless modified or revoked, this Permit expires upon issuance of the next Part 70 Permit for this source.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-17603 dated June 28, 2007 and February 21, 2008; any other applications upon which this Permit or Permit No. 2631-185-0001-V-01-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 page(s).

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

Packaging Corporation of America is located in proximity to 1 Federal Class I area: the Saint Mark National Wildlife Refuge Area. EPA's Regional Haze Rule (40 CFR 51.308) requires that visibility in all Class I areas be restored to natural background by 2064. In accordance with this rule, EPD is required to submit to EPA a Regional Haze State Implementation Plan that will demonstrate reasonable progress toward the 2064 levels starting in 2018 (40 CFR 51.308(d)(1)). As part of the reasonable progress analysis, EPD identified emission units that, following implementation of all currently required controls, will significantly contribute to visibility impairment at one or more Class I areas.

EPD determined that one emission unit at the PCA facility is a source of emissions that may cause significant impact on the visibility in the Saint Marks Class I area:

- CE Power Boiler (Source Code 1017)

This unit is a source of gaseous SO<sub>2</sub> emissions. SO<sub>2</sub> gas, which is formed by combustion of sulfur-containing fuel, is a precursor to the formation of fine particulate matter in the form of sulfates. Sulfates are significant contributors to the reduction of visibility in the Saint Marks Class I area. Reference Georgia's Regional Haze State Implementation Plan for more information about the criteria for identifying emissions units that are deemed to have significant impacts on visibility in Georgia's Class I areas.

In correspondence dated March 21, 2007, EPD requested that the facility perform a 4-factor analysis for each of the above emissions units to identify potential SO<sub>2</sub> control options and to establish the feasibility of implementing such controls. In correspondence dated June 28, 2007 (and in application 17603 dated February 21, 2008), PCA requested to take a voluntary emissions limit in lieu of performing the 4-factor analyses. This voluntary limit should reduce visibility impairment from the emission unit to levels that would no longer be considered significant by EPD. This proposal was accepted by EPD and the following SO<sub>2</sub> emissions limit, to be effective not later than January 1, 2012, is established for purposes of improving visibility in the Saint Marks Class I area:

- CE Power Boiler (Source Code 1017)                      600 tons per rolling 12 months

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

**3.3 Equipment Federal Rule Standards**

- 3.3.48 The Permittee shall not discharge or cause the discharge into the atmosphere from the CE Power Boiler (Source Code 1017), sulfur dioxides (SO<sub>2</sub>) emissions in amounts equal to or exceeding 600 tons during any 12 consecutive month period effective January 1, 2012. [Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

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