

Facility Name: **Hollingsworth & Vose Company**

City: Hawkinsville

County: Pulaski County

AIRS #: 04-13-235-00008

Application #: 16430

Date SIP Application Received: N/a

Date Title V Application Received: October 24, 2005

Permit No: 2621-235-0008-V-02-1

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft 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 draft 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 public comment period and 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, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2621-235-0008-V-02-0	July 28, 2005	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2621-235-0008-V-02-0	Renewal Title V operating permit.

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

The Hollingsworth & Vose facility is considered a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- a. Emissions of VOC from Production Line 76, Resin/Solvent Tanks TK1, TK2, TK3, TK5, TK6, TK7 and TK8, Additive Tanks AD01 and AD02, and Feed Tank FT01 are limited to less than 250 tons during any twelve consecutive months.
- b. The Permittee must capture and incinerate 98 percent of the mass of all HAPs delivered to the saturator on Production Line 76.
- c. The Permittee must operate an emissions capture system for Production Line 76 that meets the requirements of a "permanent total enclosure" as specified in Method 204 of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
- d. The RTO on Production Line 76 must destroy no less than 98 percent of the mass of VOC and HAP entering the device.

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 ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

This modification is for the incorporation of the full requirements of 40 CFR 63 Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating for the operation of Paper Machine 72 (Source Code PM72) and Production Line 76 (Source Code L76).

Production Line 76 was permitted in 2002 under case-by-base MACT. It was determined that the line and the associated Regenerative Thermal Oxidizer (Source Code RTO) would comply with the new source requirements of 40 CFR 63 Subpart JJJJ as proposed on September 30, 2000. The compliance option used by the facility requires that no more than 2 percent of the organic HAP applied for each month (98 percent reduction) be emitted to the atmosphere. The facility demonstrates compliance with this emission standard by operating a “permanent total enclosure” capture system for the line (meaning all HAP emissions are captured and routed to the control device) and operating the thermal oxidizer at minimum destruction efficiency of 98 percent.

Paper Machine 72 is classified as an existing source under 40 CFR 63 Subpart JJJJ. The facility will demonstrate compliance with the subpart through the use of “as applied” compliant coating materials. The facility must limit the monthly average of all coating material used to not more than 0.2 kg organic HAP per kg solids as-applied. Compliance is demonstrated through coating usage records and an equation prescribed by the subpart.

It should be noted that 40 CFR 63 Subpart JJJJ defines as the affected source the entire collection of paper lines at the facility. Therefore, barring other regulations, Production Line 76 would be required to comply with the 95% reduction efficiency for HAP as required of existing facilities. However, Hollingsworth & Vose is required to comply with the 98% reduction efficiency in order to avoid PSD review for VOC emissions and based on case-by-case MACT. Because Paper Machine 72 is regulated as an existing source and Paper Machine 76 is regulated as a new source, two separate emission limits and compliance demonstration requirements have been included in the permit for the two separate lines. This is based on guidance from the Stationary Source Compliance Program Toxics Unit. In cases where a facility uses a combination of compliant coatings and capture/control devices, the subpart requires that the facility conduct calculations to demonstrate compliance with the single emission limit. This is not feasible for Hollingsworth & Vose.

For Production Line 76, federal regulations allow the Division to enforce the case-by-case MACT over the subpart if the case-by-case determination is more stringent. In this case the more stringent requirements are contained in the additional PSD avoidance and case-by-case MACT conditions, not the subpart itself. The facility has agreed to begin complying with the final subpart on December 5, 2005 with regard to monitoring, record keeping, and reporting (federal regulations allow up to 8 years to achieve compliance). This does not impact the PSD avoidance requirements that will continue to be part of the Title V permit.

There were several changes made to the rule between the proposed version and the final version, however only a few of these changes impact the use of the RTO to control emissions at Hollingsworth & Vose. First, the proposed rule did not clearly indicate what constituted a valid set of data for an hourly reading for the temperature monitoring. This has been clarified in the final rule. The final rule also removes some performance specifications for parameter monitoring of control devices that were overly burdensome. None of these changes compromised continuous compliance assurance. Finally, the final rule allows facilities to comply with a 20 ppm emission limit for RTOs provided that capture efficiency of emissions is 100%. This does not affect Hollingsworth & Vose because Production Line 76 must comply with the 98% destruction efficiency and 100% capture efficiency of the PSD avoidance limits and the case-by-case MACT determination.

B. Emissions Change

This modification does not involve any physical changes to the source; therefore, there will be no increase in potential emissions. In general, emissions from a source are reduced when it comes into compliance with a MACT standard.

C. PSD/NSR Applicability

This modification does not require review under PSD regulations.

III. Facility Wide Requirements

A. Emission and Operating Caps:

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

B. Applicable Rules and Regulations

There are no new or modified facility wide applicable rules or regulations associated with this modification.

C. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

D. Operational Flexibility

The facility has not made an operational flexibility request for this modification.

E. Permit Conditions

There are no new or modified facility wide permit conditions associated with this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

The Hollingsworth & Vose facility produces filter and specialty papers.

In one production line (Paper Machine 72), cellulose and synthetic fibers are dispersed in water, formed into sheets, and dried. The sheets are then coated with a resin/solvent solution, dried, and converted into small rolls for shipment.

The facility also operates a continuous filter paper line (Production Line 76). The line consists of an unrolling section, a saturator for applying resin coating, a natural gas- fired pre-dryer, a corrugator, a final dryer, and a rolling section that rolls the final product onto spools. VOC/HAP emissions from Production Line L76 are captured and vented to a Regenerative Thermal Oxidizer (Source Code RTO). The thermal oxidizer is permitted to exhaust to a heat recovery boiler (Source Code B3).

The plant operates two natural gas / propane boilers (Source Codes B1 and B2) and several storage tanks to support the filter paper line.

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
PM72	Paper Machine 72	40 CFR 63 Subpart JJJJ 391-3-1-.02(2)(w)	3.3.9, 3.3.10, 3.3.12, 3.4.3, 6.1.7, 6.2.3 through 6.2.6, and 6.2.11 through 6.2.15*	None	None
L76	Production Line 76	40 CFR 63 Subpart B 40 CFR 63 Subpart JJJJ 391-3-1-.02(2)(w)	3.2.1, 3.3.4 through 3.3.7, 3.3.9, 3.3.10, 3.4.3, 5.2.1, 5.2.3 through 5.2.7, 6.1.7, 6.2.2, 6.2.7 through 6.2.11, and 6.2.13 through 6.2.17*	RTO	Regenerative Thermal Oxidizer

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

C. Equipment & Rule Applicability

There are no new applicable rules or regulations as a result of this modification.

D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

E. Operational Flexibility

The facility has not made any requests for operational flexibility for this modification.

F. Permit Conditions

The citations for Conditions 3.3.5 through 3.3.7 have been modified. The conditions specify how the facility must comply with the new source limit for Production Line 76 through the operation of the permanent total enclosure capture systems and the regenerative thermal oxidizer. The citations now include reference to 40 CFR 63 Subpart JJJJ.

Condition 3.3.12 has been added to the permit. The condition specifies the emission standard the facility must comply with for Paper Machine 72 under 40 CFR 63 Subpart JJJJ.

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

A. Individual Equipment:

There are no new or modified testing requirements for individual equipment associated with this modification. The facility has conducted the necessary testing for the capture systems and control device associated with Production Line 76.

B. Equipment Groups (all subject to the same test requirements):

There are no new or modified testing requirements for equipment groups associated with this modification.

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

A. Individual Equipment:

Condition 5.2.1.a has been modified. The condition requires the facility to continuously monitor temperature for the Regenerative Thermal Oxidizer (Source Code RTO). Language has been added to the condition, per final 40 CFR 63 Subpart JJJJ, which includes accuracy, placement, and calibration requirements for the temperature monitoring/recording system. The citation has also been updated to include 40 CFR 63 Subpart JJJJ.

The citations for Conditions 5.2.1.b and 5.2.1.c have been modified. The conditions require the facility to monitor the permanent total enclosure capture systems for Production Line 76. Reference to 40 CFR 63 Subpart JJJJ has been added to the conditions.

Condition 5.2.5 has been added to the permit. The condition describes the minimum requirements associated with the use of the CPMS (continuous parameter monitoring system), for monitoring and recording thermal oxidizer temperature, including the minimum data collection requirements, data validity requirements, and instructions on calculating average temperatures. The condition also requires the facility to record results of equipment checks and maintain spare parts for the system. The condition has been written per final 40 CFR 63 Subpart JJJJ.

Condition 5.2.6 has been added to the permit. The condition requires the facility to maintain a site-specific monitoring plan for the capture systems serving the Regenerative Thermal Oxidizer and operate the systems in accordance with the plan. The facility has established the Coater Room pressure and the Corrugator Room pressure as appropriate parameters for demonstrating compliance with the permanent total enclosure provisions. The condition has been written per final 40 CFR 63 Subpart JJJJ.

Condition 5.2.7 has been added to the permit. The condition requires the facility to implement and maintain a program for leak detection and correction for the hoses and ductwork for the 40 CFR 63 Subpart JJJJ capture systems. The monitoring is necessary to demonstrate that HAP and VOC emissions are properly routed to the thermal oxidizer for destruction.

B. Equipment Groups (all subject to the same monitoring requirements):

There are no new or modified monitoring requirements for equipment groups associated with this modification.

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7.b(v) has been added to the permit. The condition requires the facility to report as an exceedance any monthly calculation for Paper Machine 72 where emissions exceed 0.2 kg organic HAP per kg coating solids applied during the month.

Condition 6.2.12 has been added to the permit. The condition requires the facility to maintain usage records for all materials used on Paper Machine 72 and to calculate the average monthly emissions of organic HAP according to 40 CFR 63 Subpart JJJJ. The records and calculations are necessary to demonstrate compliance with the subpart.

Condition 6.2.13 has been added to the permit. The condition requires the facility to maintain records for the operation of Paper Machine 72 and Production Line 76 per final 40 CFR 63 Subpart JJJJ. The records include thermal oxidizer/capture system/temperature CPMS operating parameter data, control efficiency data for the thermal oxidizer, and organic HAP content data for coatings and coating usage data. The facility must also maintain records of deviations for emission limits, SSM occurrences, and changes at the facility that impact compliance options. The records are necessary to demonstrate ongoing compliance with 40 CFR 63 Subpart JJJJ.

Condition 6.2.14 has been added to the permit. The condition requires the facility to submit semiannual compliance reports for the operation of Paper Machine 72 and Production Line 76 with respect to 40 CFR 63 Subpart JJJJ. The reports summarize any deviations that may have occurred during the reporting period.

Condition 6.2.15 has been added to the permit. The condition requires the facility to submit a Notification of Compliance Status for the coating operations. This is a requirement of 40 CFR 63 Subpart JJJJ.

Condition 6.2.16 has been added to the permit. The condition requires the facility to develop and implement a SSM Plan for operation of Production Line 76. The plan is used to ensure that emissions are minimized during periods of startup, shutdown, and malfunction and that the facility is prepared to correct malfunctions as quickly as possible. This is a requirement of 40 CFR 63 Subpart JJJJ for lines that use a control device to demonstrate compliance.

Condition 6.2.17 has been added to the permit. The condition requires the facility to submit reports to the Division when actions taken during a SSM event are not consistent with the SSM plan. These reports are a requirement of 40 CFR 63 Subpart JJJJ.

VIII. Specific Requirements

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

This modification does not change the source's applicability.

J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not Applicable.

Addendum to Narrative

The 30-day public review started on Wednesday, February 8, 2006 and ended on Friday, March 10, 2006. Comments were not received by the Division.