

Facility Name: **Pratt Industries (U.S.A.), Inc. – Jet Corr, Inc.**
 City: Conyers
 County: Rockdale
 AIRS #: 04-13-247-00047

Application #: TV-11899
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 Permit No: 2679-247-0047-V-02-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. 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, 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 is to consolidate and identify existing state and federal air requirements applicable to **Pratt Industries (U.S.A.), Inc. – Jet Corr, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. 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:

Jet Corr, Inc.

2. Parent/Holding Company Name

Pratt Industries (U.S.A.), Inc.

3. Previous and/or Other Name(s)

None applicable.

4. Facility Location

1800 B Sarasota Parkway, Conyers, Georgia

5. Attainment or Non-attainment Area Location

This facility is located in Rockdale County, is a non-attainment area for ozone (NO_x and VOC); and is an attainment area for CO, SO₂, PM/PM₁₀, and lead.

6. Class I Area Impacts

None applicable.

B. Site Determination

Jet Corr, Inc. (AFS No. 247-0047, hereinafter facility) and Visy Paper, Inc. (AFS No. 247-0037) are one Part 70 source because they are under common control, located on contiguous and/or adjacent property, and have the same 2-digit SIC code. They are both owned and managed by Pratt Industries (U.S.A.), Inc. (hereinafter source). They are in adjacent buildings (internally connected) located on the same property, 1800 Sarasota Parkway, Conyers, Georgia. Jet Corr manufactures corrugated paper sheets (SIC code 2679), while Visy Paper produces recycled linerboard and medium paperboard (SIC code 2631); therefore, they share the same first 2-digit SIC code. Visy Paper and Jet Corr are one Title V major source because the combined potential emissions of NO_x, CO, and VOC would exceed 50, 100, and 50 tpy, respectively.

C. Existing Permits**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
2679-247-0047-E-01-0	10/23/1998, and amended on 1/29/2001		X

D. Process Description

1. SIC Codes(s)

Major - 2679

2. Description of Product(s)

The final products of Jet Corr, Inc., is corrugated paper sheets and flexographically printed paper boxboards.

3. Overall Facility Process Description

Jet Corr receives rolls of paper from Visy Paper, and then feeds them through a “Millogator Corrugating Machine.” The corrugator (ID No. JC02) glues layers of paper with a non-VOC, cornstarch based adhesive to produce a corrugated paper laminate. A 20.925 MM Btu/hr York Shipley Boiler (ID No. JC01) produces steam for drying the corrugated paper. Boiler JC01 fires natural gas, and is capable of firing No. 2 fuel oil during natural gas curtailment. The corrugated paper is either packed for shipping or further processed into printed boxes.

The facility installed five flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07) and two rotary die cutters (ID Nos. FM03 and FM04) to allow on-site printing in early 2001. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard.

4. Overall Process Flow Diagram (optional)

There is a flow diagram attached to the application.

E. Regulatory Status

1. PSD/NSR

Jet Corr and Visy Paper are located in the ozone non-attainment area. The combined source is major under nonattainment NSR under CAA because combined Potential-to-Emit (PTE) for NO_x and VOC both exceed 50 tpy. Before Jet Corr was constructed in 1998, NO_x emission had been limited below 50 tpy from Visy Paper by Condition No. 5 in Permit No. 2631-122-11338. This limit had made Visy Paper a synthetic minor source under nonattainment area NSR (until Jet Corr was added) and a nonattainment area new source review had been avoided. Removal of that condition will result in a retroactive nonattainment area new source review for the entire source.

The combined source is one of the 28 named source categories under PSD of CAA because of the 279.4 MM Btu/hr boiler in Visy Paper. The combined source is a major source under PSD of CAA because the combined PTE for CO exceeds 100 tpy. Similar to the previous paragraph, Condition No. 6 in Permit No. 2631-122-11338 limits CO emission from Visy Paper below 100 tpy. Removal of that condition will result in a retroactive PSD review for the entire source.

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	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

None applicable.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

Although NO_x and CO emissions are limited to 50 and 100 tpy from Visy Paper; there is no emission and operating cap that applies to Jet Corr.

B. Applicable Rules and Regulations

As discussed in Section III.C, the facility agrees to handle, convey, and store all of the VOC based cleaners in a manner which minimizes the risk of spillage or volatilization. This is accepted as the RACT plan required by Georgia Rule (tt), “VOC Emissions from Major Sources.” Thus, Conditions 2.4.1-2.4.3 are added to minimize VOC emissions from the facility.

C. Compliance Status

None applicable.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None applicable.

III. Regulated Equipment Requirements**A. Brief Process Description**

Jet Corr receives rolls of paper from Visy Paper, and then feeds them through a “Millogator Corrugating Machine.” The corrugator (ID No. JC02) glues layers of paper with a non-VOC, cornstarch based adhesive to produce a corrugated paper laminate. A 20.925 MM Btu/hr York Shipley Boiler (ID No. JC01) produces steam for drying the corrugated paper. Boiler JC01 fires natural gas, and is capable of firing No. 2 fuel oil during natural gas curtailment. The corrugated paper is either packed for shipping or further processed into printed boxes.

The facility installed five flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07) and two rotary die cutters (ID Nos. FM03 and FM04) to allow on-site printing in early 2001. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard.

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
JC01	York Shipley Boiler	40 CFR Subpart Dc Rule 391-3-1-.02(2)(d)2.(ii) Rule 391-3-1-.02(2)(d)3. Rule 391-3-1-.02(2)(g)2. Rule 391-3-1-.02(2)(yy)1.	3.2.1, 3.2.2, 3.3.1, 3.4.2, 3.4.3, 5.2.1, 5.2.2, 5.3.1, 6.2.1, 6.2.2, 6.2.4, 6.2.5	none	none
JC02	Corrugator	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.4.1, 3.4.4	none	none
FM01	Flexo Folder Gluer	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.2.3, 3.4.1, 3.4.4, 6.2.6	none	none
FM02	Flexo Folder Gluer	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.2.3, 3.4.1, 3.4.4, 6.2.6	none	none
FM03	Rotary Die Cutter	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i)	3.4.1, 3.4.4	none	none
FM04	Rotary Die Cutter	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i)	3.4.1, 3.4.4	none	none
FM05	Flexo Folder Gluer	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.2.3, 3.4.1, 3.4.4, 6.2.6	none	none
FM06	Flexo Folder Gluer	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.2.3, 3.4.1, 3.4.4, 6.2.6	none	none
FM07	Flexo Folder Gluer	Rule 391-3-1-.02(2)(b)1. Rule 391-3-1-.02(2)(e)1.(i) Rule 391-3-1-.02(2)(tt)1.	3.2.3, 3.4.1, 3.4.4, 6.2.6	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 –

1. As discussed later in the Applicable Rules and Regulations part, the facility is required to fire natural gas exclusively in the boiler (ID No. JC01) during the months of May through September; and NOx emission from the boiler is limited below 0.2 pounds per million Btu heat input.
2. Also as discussed later in the Applicable Rules and Regulations part, the facility is allowed to use any adhesive, in which the VOC content is equal to or less than 1 percent by weight, in the flexo folder gluers (ID Nos. FM01, FM02, FM05, FM06, and FM07). The requirement is included in Condition No. 20 of Permit Amendment No. 2679-247-0047-E-01-1, and will be transferred into the draft Title V permit.

Applicable Rules and Regulations -*York Shipley Boiler JC01*

York Shipley Boiler VP01 was manufactured and installed in 1998. It has a capacity of 20.925 MMBtu/hr, capable of firing natural gas and No. 2 fuel oil. Boiler JC01 is subject to New Source Performance Standards (NSPS) as found in 40 CFR Part 60, in particular Subpart A - "General Provisions" and Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units." It is also subject to Georgia Rule 391-3-1-.02(2)(d), "Fuel Burning Equipment."

Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of the emissions from Boiler JC01 to twenty (20) percent.

The allowable PM emission rate from Boiler JC01 is specified by Georgia Rule 391-3-1-.02(2)(d)2.(ii), which is stated as follows:

$$P = 0.5 * (10 / R)^{0.5}$$

Where P equals the allowable PM emission rate in pounds per million BTU and R equals the heat input in million BTUs per hour.

Boiler JC01 has an R value of 20.925 MM Btu/hr; thus, allowable PM emission from each boiler:

$$P = 0.5 * (10 / 20.925)^{0.5} = 0.346 \text{ lb} / \text{MM Btu}$$

When Boiler JC01 fires natural gas, compliance with Rule (d) is expected because natural gas is considered clean fuel. Compliance with Rule (d) is also expected when Boiler JC01 fires No.2 fuel oil according to the following calculation.

$$\begin{aligned} &\text{PM Emission Factor (AP-42, No.2 Fuel Oil, <100 MM Btu/hr)} \\ &= (2 \text{ lb}/1,000 \text{ gal}) * (1 \text{ gal}/0.140 \text{ MM Btu}) \\ &= 0.0143 \text{ lb/MM Btu} < 0.346 \text{ lb/MM Btu} \end{aligned}$$

Therefore, **Compliance with Rule (d) is always expected.**

Georgia Rule for Air Quality Control Rule 391-3-1-.02(2)(g)2 prohibits firing any fuel that contains greater than 2.5 percent sulfur, by weight for fuel burning sources having a heat input below 100 MMBtu/hr. Boiler JC01 only fires natural gas or No. 2 fuel oil. Since natural gas contains minimal sulfur and the applicant indicated in TV application that No. 2 fuel oil with a maximum sulfur content of 0.5 percent, by weight, will be burned in the boiler, **compliance with Georgia Rule (g) is always expected.** Additionally, the percent (90%) sulfur reduction requirement of 40 CFR 60.42c is not applicable because the boiler is permitted to fire only fuel oil with a sulfur content of 0.5 percent or less.

Georgia Rule for Air Quality Control Rule 391-3-1-.02(2)(yy)1. requires the facility to have all reasonably available control technology (RACT, approved by the Division) in controlling NOx emission because the facility is located in Rockdale County, and the source-wide PTE for NOx exceeds 50 tpy. Jet Corr submitted a NOx RACT plan on September 24, 1998. The plan indicated that Jet Corr's York Shipley boiler, if burning natural gas, only produces 0.20 pound NOx per million Btu – an emission rate accepted by other state agencies as RACT for small boilers. The plan went on to conclude that fuel restrictions and annual tune-ups should suffice for purposes of RACT. The RACT plan was approved by the Division. (NOx emission from Boiler JC01 is limited below 0.2 pounds per million Btu heat input by Condition No.7 of Permit No. 2679-247-0047-E-01-0; and the same requirement will be transferred into the draft Title V permit.) Therefore, **Compliance with Georgia Rule (yy) is expected.**

Corrugator JC02

Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of the emissions from Corrugetor JC02 to forty (40) percent.

Since Corrugator JC02 (constructed in 1998) was constructed after July 2, 1968, the allowable PM emission rate from VP02 is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

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

Where E equals the allowable PM emission rate in pounds per hour and P equals process input weight rate in tons per hour.

According to Section 5.90 of the update application, dated on May 16, 2001, the weight input rate (exclude water) is 23.7 tons per hour. Thus, the allowable PM emission from JC02:

$$E = 4.1 * 23.7^{0.67} = 34.2 \text{ lbs/hr}$$

Since Corrugator JC02 only glues layers of paper to produce a corrugated paper laminate, PM emission from JC02 is minimal. Therefore, **compliance with Georgia Rule (e) is expected.**

Georgia Rule for Air Quality Control Rule 391-3-1-.02(2)(tt)1. requires the facility to have all reasonably available control technology (RACT, approved by the Division) in controlling VOC emission because the facility is located in Rockdale County, and the source-wide PTE for VOC exceeds 25 tpy. Section 7.10 of the update Title V Application No. 11899 states that Corrugator JC02 emits 5 tons of VOC per year. The facility claims that the use of corn starch will not emit any VOC emissions. According to the RACT plan, dated October 26, 1998, Jet Corr would use various kinds of cleaning agents that have VOC contents from 0 to 100 %. Use of these cleaning

agents results in the 5 tpy VOC emissions, as given in Section 7.10 of the update Title V application. The facility also requests to have the flexibility to use either cleaning agent. Per Conversation with Mr. Shauket Syed on August 30, 2001, the facility agrees to handle, convey, and store all of the VOC based cleaners in a manner which minimizes the risk of spillage or volatilization. This is accepted as the RACT plan by the Division.

Thus, **compliance with Georgia Rule (tt) is expected.**

Flexo Folder Gluers FM01, FM02, FM05-FM07 and Rotary Die Cutters FM03 and FM04

Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of the emissions from Flexo Folder Gluers FM01, FM02, FM05, FM06, FM07, and Rotary Die Cutters FM03 and FM04 to forty (40) percent.

For the applicability of Georgia Rule (e), each of the flexo folder gluer (ID Nos. FM01, FM02, FM05, FM06, and FM07) or each of the rotary die cutters (ID Nos. FM03 and FM04) is determined as one individual process line. Since FM01-FM07 were all constructed after July 2, 1968, the allowable PM emission rate from each flexo folder gluer is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

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

Where E equals the allowable PM emission rate in pounds per hour and P equals process input weight rate in tons per hour.

According to the information provided in Section 5.90 of the update application, dated on May 16, 2001, the allowable PM emission rate from each flexo folder gluer is included in the following table.

ID No.	Input Rate P, ton/hr	PM Allowable E, lb/hr
FM01	3.7	$E = 4.1 * 3.7^{0.67} = 9.85 \text{ lbs/hr}$
FM02	3.6	$E = 4.1 * 3.6^{0.67} = 9.67 \text{ lbs/hr}$
FM03	4.1	$E = 4.1 * 4.1^{0.67} = 10.6 \text{ lbs/hr}$
FM04	3.3	$E = 4.1 * 3.3^{0.67} = 9.12 \text{ lbs/hr}$
FM05	3.5	$E = 4.1 * 3.5^{0.67} = 9.49 \text{ lbs/hr}$
FM06	4.2	$E = 4.1 * 4.2^{0.67} = 10.7 \text{ lbs/hr}$
FM07	2.9	$E = 4.1 * 2.9^{0.67} = 8.37 \text{ lbs/hr}$

The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard. These equipments emit minimum amount of PM because of the nature of the processes. Therefore, **compliance with Georgia Rule (e) is expected.**

Georgia Rule for Air Quality Control Rule 391-3-1-.02(2)(tt)1. requires the facility to have all reasonably available control technology (RACT, approved by the Division) in controlling VOC emission because the facility is located in Rockdale County, and the source-wide PTE for VOC exceeds 25 tpy. However, Georgia Rule (tt) does not apply to VOC emissions subject to specific VOC requirements outlined in other subsections of the Georgia Air Quality Rules. The inks used in the flexo folder gluers and rotary die cutters are potentially subject to Georgia Air Quality Rule

391-3-1-.02(2)(mm), “VOC Emissions from Graphic Art Systems.” No specific VOC requirements apply to the adhesives. Therefore, while the inks are not subject to Rule (tt), the adhesives are.

Section 7.10 of the updated Application No. 11899, dated May 16, 2001, provides VOC emissions data from the flexo folder gluers. Maximum VOC emissions from Flexo Folder Gluers FM01, FM02, FM05, FM06, and FM07 are 1.5, 1.5, 1.5, 1.72, and 1.19 tpy. Maximum VOC emissions from Rotary Die Cutters FM03 and FM04 are 1.1 and 1.0 tpy. The total potential VOC emissions from the gluers and cutters, 9.51 tpy, are less than 25 tpy. Because the total potential VOC emissions are less than 25 tpy, Jet Corr is not subject to Rule (mm).

Jet Corr submitted a VOC RACT plan on January 11, 2001. The plan indicated that Jet Corr would use water-based adhesives that contain a maximum VOC content of approximately 1%, by weight. Although the plan did not address add-on controls, the Division concluded that since actual emissions are expected to be less than 2 tons VOC per year, the pollutants would be too dilute for effective control. Since the use of water-based chemicals is typically accepted as RACT, the Division accepted Jet Corr’s plan. Therefore, **compliance with Georgia Rule (tt) is expected.**

Source-wide Potential-to-Emit

The only fuel burning equipment is Nebraska boiler (ID No. VP01) in Visy Paper and York Shipley boiler (ID No. JC01) in Jet Corr. The fuel burning equipment is the only source that emits NO_x, CO, SO₂, and PM/PM₁₀ emissions. VOC emissions come from the fuel burning equipment and other process equipment. Other process equipment includes the paper machine (ID No. VP02) in Visy Paper, the corrugator (ID No. JC02), the flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07), and the rotary die cutters (ID Nos. FM03 and FM04) in Jet Corr.

[Source-wide PTE for NO_x]

Condition No. 7 in Permit No. 2679-247-0047-E-01-0 limits that Boiler JC01 fires exclusively natural gas during the months of May through September (153 days), and NO_x emissions during such period cannot exceed 0.2 lbs/MM Btu as the NO_x RACT plan, which is required by Georgia Rule (yy) “Emissions of Nitrogen Oxides from Major Sources.”

NO_x E. F. (AP-42, Natural Gas, <100 MM Btu/hr) = 100 lbs/10⁶ scf (0.100 lb/MM Btu)

NO_x E.F. (AP-42, No. 2 Fuel Oil, <100 MM Btu/hr) = 20 lbs/1,000 gal (0.143 lb/MM Btu)

Fire natural gas for at least 153 days = 24 * 153 = 3,672 hrs/yr

To be conservative, fire No. 2 fuel oil = 24 * (365 – 153) = 5,088 hrs/yr

PTE for NO_x from Boiler JC01

= (20.925 MM Btu/hr) * [(1 scf/0.001 MM Btu) * (100 lbs/10⁶ scf) * (3,672 hrs/yr) +

(1 gal/0.14 MM Btu) * (20 lbs/1,000 gal) * (5,088 hrs/yr)] * (1 ton/2,000 lbs)

= 11.4 tpy

PTE for NO_x from Visy Paper (Boiler VP01) is limited to 50 tpy. Therefore,

Source-wide PTE for NO_x = 11.4 + 50 = 61.4 tpy

[Source-wide PTE for CO]

CO E. F. (AP-42, Natural Gas, <100 MM Btu/hr) = 84 lbs/10⁶ scf (0.0840 lb/MM Btu)

CO E.F. (AP-42, No. 2 Fuel Oil, <100 MM Btu/hr) = 5 lbs/1,000 gal (0.0357 lb/MM Btu)

To be conservative, Boiler JC01 fires natural gas year round.

PTE for CO from Boiler JC01

= (20.925 MM Btu/hr) * (1 scf/0.001 MM Btu) * (84 lbs/10⁶ scf) * (8,760 hrs/yr)

* (1 ton/2,000 lbs)

= 7.70 tpy

PTE for CO from Visy Paper (Boiler VP01) is limited to 100 tpy. Therefore,

Source-wide PTE for CO = 7.70 + 100 = 108 tpy

[Source-wide PTE for SO₂]

SO₂ Emission Factor (AP-42, Natural Gas) = 0.6 lb/10⁶ scf (0.0006 lb/MM Btu)

S = Maximum Sulfur Content = 0.5 (%)

SO₂ Emission Factor (AP-42, No. 2 Fuel Oil, <100 MM Btu/hr) = 142 * S lbs / 1,000 gal

= 142 * 0.5 lbs / 1,000 gal = 71 lbs/1,000 gal (0.507 lb/MM Btu)

Boiler JC01 fires natural gas (with negligible SO₂ emission) for 3,672 hrs/yr and No. 2 fuel oil for 5,088 hrs/yr.

PTE for SO₂ from Boiler JC01

= (20.925 MM Btu/hr) * (1 gal/0.14 MM Btu) * (71 lbs/1,000 gal) * (5,088 hrs/yr)

* (1ton/2,000 lbs)

= 27.0 tpy

Condition No. 8 of Permit No. 2631-122-11338 limits the operation of the Nebraska boiler (ID No. VP01) to an annual capacity factor of 10 percent or less for the consumption of fuel oil based on a 12 month rolling average. As discussed previously, this limit yields the PTE for SO₂ from Boiler VP01 as 68.6 tpy. Thus,

Source-wide PTE for SO₂ = 27.0 + 68.6 = 95.6 tpy

[Source-wide PTE for PM/PM₁₀]

PM/PM₁₀ Emission Factor (AP-42, Natural Gas) = 7.6 lbs/10⁶ scf (0.00760 lb/MM Btu)

PM/PM₁₀ E.F. (AP-42, No. 2 Fuel Oil, All Sizes) = 2 lbs/1,000 gal (0.0143 lb/MM Btu)

To be conservative, Boiler JC01 fires natural gas for 3,672 hrs/yr and No. 2 fuel oil for 5,088 hrs/yr; Boiler VP01 fires No. 2 fuel oil for 10% of annual capacity and natural gas for the rest of the year.

PTE for PM/PM₁₀ from Boiler JC01

= (20.925 MM Btu/hr) * [(1 scf/0.001 MM Btu) * (7.6 lbs/10⁶ scf) * (3,672 hrs/yr) +
(1 gal/0.14 MM Btu) * (2 lbs/1,000 gal) * (5,088 hrs/yr)] * (1 ton/2,000 lbs)

= 1.05 tpy

PTE for PM/PM₁₀ from Boiler VP01

$$= (279.4 \text{ MM Btu/hr}) * [(1 \text{ scf}/0.001 \text{ MM Btu}) * (7.6 \text{ lbs}/10^6 \text{ scf}) * (8,760 \text{ hrs/yr}) * (90\%) + (1 \text{ gal}/0.14 \text{ MM Btu}) * (2 \text{ lb}/1,000 \text{ gal}) * (8,760 \text{ hrs/yr}) * (10\%)] * (1 \text{ ton}/2,000 \text{ lbs})$$

$$= 10.1 \text{ tpy}$$

Source-wide PTE for PM/PM₁₀ = 1.05 + 10.1 = 11.2 tpy

[Source-wide PTE for VOC]

Boilers

VOC Emission Factor (AP-42, Natural Gas) = 5.5 lbs/10⁶ scf (0.00550 lb/MM Btu)

VOC Emission Factor (AP-42, No. 2 Fuel Oil) = 0.2 lbs/1,000 gal (0.00143 lb/MM Btu)

To be conservative, Boilers VP01 and JC01 both fire natural gas year round.

PTE for VOC from Boilers VP01 and JC01

$$= [(279.4 \text{ MM Btu/hr}) + (20.925 \text{ MM Btu/hr})] * (1 \text{ scf}/0.001 \text{ MM Btu}) * (5.5 \text{ lbs}/10^6 \text{ scf}) * (8,760 \text{ hrs/yr}) * (1 \text{ ton}/2,000 \text{ lbs})$$

$$= 7.23 \text{ tpy}$$

Process Equipment

According to Section 7.10 of the updated Application No. 11898, dated May 16, 2001, maximum annual VOC emission is given as 45 tpy from Paper Machine VP02 (Visy Paper). Per conversation with Mr. Matt Ehret, they operate the facility for 8,760 hours per year. They include VOC emissions from the conditioners and cleaners, and estimate the total emission as 45 tpy by mass balance (assuming 100 % of the VOC content emits into the atmosphere).

Section 7.10 of the updated Application No. 11899, dated May 16, 2001, provides VOC emissions data from various process equipment. Maximum VOC emissions from Corrugator JC02 is 5 tpy, based on mass balance. Maximum VOC emissions from Flexo Folder Gluers FM01, FM02, FM05, FM06, and FM07 are 1.5, 1.5, 1.5, 1.72, and 1.19 tpy. Maximum VOC emissions from Rotary Die Cutters FM03 and FM04 are 1.1 and 1.0 tpy.

Source-wide PTE for VOC = 7.23 + 45 + 5 + 1.5 + 1.5 + 1.5 + 1.72 + 1.19 + 1.1 + 1.0
= 66.7 tpy

[Source-wide PTE for HAPs]

Firing natural gas and/or No. 2 fuel oil in Boilers VP01 and JC01 will emit insignificant amount of hazardous air pollutants (HAPs). The majority of HAPs is emitted from the process equipments. According to Section 7.10 of the updated Application No. 11898, dated May 16, 2001, maximum annual HAPs emissions are given as 9 tpy from Paper Machine VP02 (Visy Paper). Section 7.10 of the updated Application No. 11899, dated May 16, 2001, also provides HAPs emissions data from various process equipments. Maximum HAPs emissions from Corrugator JC02 is 0.5 tpy, based on mass balance. Maximum HAPs emissions from Flexo Folder Gluers FM01, FM02, FM05, FM06, and FM07 are 1.0, 1.0, 1.0, 1.15, and 0.79 tpy. Maximum HAPs emissions from Rotary Die Cutters FM03 and FM04 are 0.55 and 0.5 tpy.

$$\begin{aligned}\text{Source-wide PTE for HAPs (combined)} &= 9 + 0.5 + 1.0 + 1.0 + 1.0 + 1.15 + 0.79 + 0.55 + 0.5 \\ &= \underline{\underline{15.5 \text{ tpy}}}\end{aligned}$$

D. Compliance Status

None applicable.

E. Operational Flexibility

None applicable.

F. Permit Conditions

The permit conditions are described above in the Facility Wide Requirements and Regulated Equipment Requirements chapters. There are no unusual conditions that need to be highlighted in this section.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

A requirement for performance testing on any specified emission unit, when directed by the Division, is included. Requirements for a 30-day notification of testing and the submission of a test plan are also included. For the emissions limitations prescribed in Section 3.3 and 3.4, test methods and procedures to be used are specified.

B. Specific Testing Requirements

The current Air Quality Rules and other applicable regulations for this facility do not contain any periodic testing requirements. This permit, therefore, does not contain any conditions to require specific testing for any source.

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

Condition No. 5.1.1 requires that all monitoring devices/systems be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements**1. Boiler JC01**

Boiler JC01 is subject to 40 CFR Part 60 Subpart Dc, “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units,” Georgia Rules 391-3-1-.02(2)(d) “Fuel-burning Equipment,” 391-3-1-.02(2)(g) “Sulfur Dioxide,” and 391-3-1-.02(2)(yy) “Emissions of Nitrogen Oxides from Major sources.”

Subpart Dc does not contain an emissions limitation for particulate matter (PM), or opacity for boilers that burn natural gas or distillate fuel oil; however, the PM and Opacity limitations in Georgia Rule 391-3-1-.02(2)(d)2(ii) are applicable. Since natural gas and distillate fuel oil are clean burning fuels, Rule (d) PM and opacity limitations are very unlikely to be exceeded and monitoring is not required.

As discussed previously, the facility is allowed to burn natural gas only during the months of May through September, and NOx emissions from Boiler JC01 is limited below 0.2 pounds per million Btu heat input during such period as the RACT plan required by Georgia Rule (yy). Periodic monitoring as described in Condition 5.2.2 is required in order to ensure the compliance of the NOx RACT limit.

Condition 3.2.1 limits the fuel oil that may be burned in the boiler to No. 2 fuel oil. Condition 3.3.1 defines No. 2 fuel oil as fuel oil that does not contain greater than 0.5 percent sulfur by weight. This limit is well within the Georgia Rule (g) limitation of 2.5 percent fuel sulfur. Fuel oil sulfur content is monitored using fuel supplier certification and supplier certifications are required in Part 6.2 of this permit.

Records of information and data related to the monitoring in Part 5.0 are required to be maintained. Records required by Subpart Dc for fuel usage, are required to be maintained and reported quarterly.

2. Corrugator JC02

Corrugator JC02 is subject to Georgia Rules 391-3-1-.02(2)(b) “Visible Emissions” for opacity, 391-3-1-.02(2)(e) “Particulate Emission from Manufacturing Processes” for Particulate Matter (PM) emissions, and 391-3-1-.02(2)(tt) “VOC Emissions from Major Sources” for VOC RACT plan. Since Corrugator JC02 only glues layers of paper to produce a corrugated paper laminate, PM emission from JC02 is minimal. It is very unlikely that PM and opacity limitation will be exceeded. As a result, no monitoring is required.

3. Flexo Folder Gluers FM01, FM02, FM05-FM07 and Rotary Die Cutters FM03 and FM04

Each flexo folder gluer (ID Nos. FM01, FM02, FM05, FM06, FM07) and rotary die cutter (ID Nos. FM03 and FM04) is subject to Georgia Rules 391-3-1-.02(2)(b) “Visible Emissions” for opacity and 391-3-1-.02(2)(e) “Particulate Emission from Manufacturing Processes” for Particulate Matter (PM) emissions. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard. These equipments emit minimum amount of PM because of the nature of the processes. It is very unlikely that PM and opacity limitation will be exceeded. As a result, no monitoring is required.

The flexo folder gluers (ID Nos. FM01, FM02, FM05, FM06, FM07) are also subject to Georgia Rule 391-3-1-.02(2)(tt) “VOC Emissions from Major Sources” for VOC RACT plan. Condition 3.2.3 limits the VOC content of any adhesive used in the flexo folder gluers to one percent or less, by weight. The Permittee is required to maintain records of all VOC-containing adhesives used in the flexo folder gluers by Condition No. 6.2.6.

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

The permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all related information to deviations from applicable requirements. Records, including identification of any excess emissions, exceedances, and excursions from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken are required to be kept by the Permittee and reported semiannually.

B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1 and 6.2.2 require the facility to submit the fuel supplier certifications for each shipment of fuel oil received during the reporting period and as well as a statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the quarterly reporting period.

Conditions 2.4.1-2.4.3 require the facility to handle, convey, and store all of the VOC based cleaners in a manner which minimizes the risk of spillage or volatilization. Condition 6.2.3 further includes these requirements into the work practice plan and requires the facility to conduct an inspection at least once per shift and maintain a log. Any adverse condition (i.e. failure to comply with work practice standard) is defined as an excursion in Condition 6.1.7.c.i.

Condition 6.2.5 requires the facility to record monthly natural gas and No. 2 distillate fuel oil usage consumed by Boiler JC01 because Boiler JC01 is subject to 40 CFR Part 60, Subpart Dc.

Condition No. 21 in Permit Amendment No. 2679-247-0047-E-01-1 requires the facility to maintain monthly VOC-containing adhesives usage. This condition is transferred into Condition 6.2.5 in the proposed Permit.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

Please refer to Section 4.10 in the Title V application for the complete list of insignificant activities.

D. Temporary Sources

None applicable.

E. Short-Term Activities

Please refer to Section 4.10 in the Title V application for the complete list of short-term activities.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Prevention of Accidental Releases

None applicable.

J. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility operates equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

K. Pollution Prevention

None applicable.

L. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The public comment period ended on August 15, 2002. Written comments were received from Pratt Industries (U.S.A.), Inc. – Jet Corr, Inc., and the Sierra Club on August 15, 2002 and August 14, 2002, respectively. No comments were received from EPA. The comments are summarized below followed by a discussion of the comments and any changes made to the permit as a result.

Below are EPD's responses to comments from the Sierra Club.

GENERAL COMMENTS**1.1 THE DRAFT PERMIT SHOULD NOT BE SUBMITTED TO THE EPA AS A PROPOSED PERMIT**

40 CFR Part 70 requires that the permitting authority send a proposed permit to the United States Environmental Protection Agency (US EPA) and that US EPA have a 45-day review period prior to issuing the permit. The current practice of the Georgia Environmental Protection Division (EPD) is to consider the draft permit the proposed permit. The Clean Air Act and its regulations do not allow for a permitting agency to treat a draft permit as a proposed permit. See Sierra Club v. Whitman, civil action No. 01-01991 (ESH) (D.D.C. 2002). Therefore EPD should issue a proposed permit only after the public comment period on the draft permit has expired and EPD has had some time to consider public comments on the draft permit and, if necessary, make appropriate changes.

EPD Response:

The Division agrees. Therefore, once all comments from the public have been considered, a proposed permit will be sent to EPA Region 4 for a 45-day review period.

1.2 THE PERMIT MUST REQUIRE THE PERMITTEE TO SUBMIT ALL MONITORING INFORMATION TO EPD

According to 40 CFR § 70.6(a)(3)(iii)(A) and 42 U.S.C. § 7661(c)(a), permits issued by state agencies must require the permittee to submit reports containing all monitoring data at least every 6 months.

The Jet Corr draft permit does require the reporting of all excess emissions, exceedances and excursions. The reporting of such deviations is in fact required by § 70.6(a)(iii)(B), whereas § 70.6(a)(iii)(A) requires submitting records from all monitoring. The Jet Corr facility is not obliged to submit records from the monitoring activities required under section 5.2.

Section 5.3.1 should be amended to require submission of the records of all data and information from the specific monitoring requirements of Section 5.2, at least semiannually. After all, the purpose of a Title V permit is to increase the public's ability to determine compliance with air pollution laws. Access to monitoring is indispensable.

EPD Response:

The section of the United States Code cited by the commenter requires that the Permittee submit, no less than every six months, the results of any required monitoring. CFR Chapter 40, Part 70.6(a)(3)(iii) and Georgia Rule 391-3-1-.03(10)(d)1.(i), which codify the requirements of the Federal Act, require the submittal, at least every six months, of reports of any required monitoring. These citations do not require the submittal of copies

of all monitoring data recorded by the Permittee, as is implied by the final line of the comment above; rather, they require submittal of reports on the results of this monitoring. The conditions within the draft permit are sufficient to meet these requirements. Note that Condition 5.3.1, noted in the comment above, is not a general reporting requirement meant to satisfy the requirements of §70.6(a)(3)(iii)(A).

The EPA has noted in a July 7, 1993 document entitled “Questions and Answers on the Requirements of Operating Permits Program Regulations” that the Permittee is not required to submit raw data on monitoring/testing as part of its monitoring reports. The Permittee is required to keep required monitoring data and support information. Support information includes all calibration and maintenance records for continuous monitoring, and copies of all reports required by the permit. Reports are required to contain the results of the monitoring required in the permit.

For further information, please see the formal response from EPA to the Sierra club related to this issue, an excerpt of which is included here for reference purposes:

“40 CFR Part 70 does not specify what form the monitoring report must take. Although the semi-annual monitoring reports required by EPD focus on the reporting of deviations, one can conclude that the monitoring results which are not reported as deviations are considered to be in compliance with the applicable permit terms or conditions by definition. This interpretation is further supported by the fact that EPD still requires reports stating that there were no deviations when there were, in fact, no deviations for a given reporting period. EPD’s permits include considerable detail regarding what must be included in a semi-annual monitoring report.”

[Letter from Winston A. Smith, Director, Air Pesticide and Toxics Management Division, US EPA, to Robert Ukeily, Counsel for the Sierra Club, dated March 29, 2002]

1.3 THE PERMIT CANNOT LIMIT THE USE OF CREDIBLE EVIDENCE IN AN ENFORCEMENT ACTION

As emphasized by the United States Environmental Protection Agency’s (EPA) Credible Evidence Rule, 62 FR 8314 (Feb. 24, 1997), the Clean Air Act (CAA) allows the public, EPD, EPA, and the regulated facility to rely upon any credible evidence to demonstrate violations of or compliance with the terms and conditions of a Title V operating permit. Specifically, EPA revised 40 CFR § 51.212, 51.12, 52.30, 60.11 and 61.12 to “make clear that enforcement authorities can prosecute actions based exclusively on any credible evidence, without the need to rely on any data from a particular reference test” [62 FR at 8316]. EPD must ensure that no permit purports to limit the use of credible evidence. Moreover, the permit should include standard language stating that all credible evidence may be used.

A. *EPD Must Modify Statements that Purport to Limit Credible Evidence*

EPD must ensure that its Title V permits contain no language that could be interpreted to limit credible evidence. For example, condition 4.1.3. in Jet Corr Facility’s permit states that “[t]he methods for the determination of compliance with emission units listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:” One could read this provision to stand for the proposition that when a government agency or member of the public takes an enforcement action for a permittee violating its permit, the enforcer can only rely on information from the methods of determination listed in the permit. This position is directly contrary to the Clean Air Act requirements in CAA §§ 113(a), 113(e)(1) and 40 CFR § 51.212, 51.12, 52.30, 60.11 and 61.12, which allow anyone taking an enforcement action to rely on any credible

evidence. Therefore, Section 4.1.3 should be modified to allow for the determination of noncompliance by any credible evidence.

Another example of the permit's implicit exclusion of credible evidence can be found in the second sentence of condition 8.17.1: "Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division." This condition limits usable evidence to information that is available to EPD. However, the public or EPA may obtain information about a facility from sources other than EPD such as information from a "whistleblower" or from people that live near the facility. It is inappropriate to exclude such information. The sentence above should be removed or re-written to state that "EPD may determine . . ."

B. EPD Should Include Standard Language in the Permit that Explicitly States that Anyone Can Use Any Credible Evidence.

The permit does not affirmatively state that any credible evidence may be used in an enforcement action. EPA supports the inclusion of credible evidence language in all Title V permits. As explained by the Acting Chief of US EPA's Air Programs branch [letter from Cheryl L. Newton, Acting Chief, Air Programs Branch, EPA, to Robert F. Hodanbosi, Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency, dated October 30, 1998]:

It is the United States Environmental Protection Agency's position that the general language addressing the use of credible evidence is necessary to make it clear that despite any other language contained in the permit, credible evidence can be used to show compliance or noncompliance with applicable requirements. . . . [A] regulated entity could construe the language to mean that the methods for demonstrating compliance specified in the permit are the only methods admissible to demonstrate violation of the permit terms. It is important that Title V permits not lend themselves to this improper construction.

In fact, EPA apparently sent a letter in May 1998 specifically directing EPD to amend its SIP to include language clarifying that any credible evidence may be used. Nevertheless, while more than three and a half years have elapsed since EPA's request, the permit does not contain the necessary language.

While anyone may rely on all credible evidence regardless of whether this condition appears in the permit, EPD should include credible evidence language in the permits and permit template to make the point clear. Specifically, EPA has recommended that the following language be included in all Title V permits [letter from Stephen Rothblatt, Acting Director, Air and Radiation Division, US EPA, to Paul Deubenetzky, Indiana Department of Environmental Management, dated July 28, 1998]:

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.

We request that EPD include this provision in the permit to clarify the acceptability of any credible evidence to demonstrate noncompliance with permit requirements. **Section 8.23.1 does not resolve this issue. This section is incoherent and unintelligible.**

EPD Response:

EPD believes this issue has been previously addressed and resolved. However, in order to review a partial history of this issue, an excerpt from the US EPA's formal response to this topic is included here:

“For clarification purposes, Condition 4.1.3 identifies the required reference methods to be used to satisfy any testing requirements; it is not intended, in any way, to limit the use of credible evidence. In fact, Condition 4.1.3 allows the use of all credible evidence and information. Georgia Rule 391-3-1-.02(3)(a), which serves as the underlying authority for Condition 4.1.3, references EPD's *Procedures for Testing and Monitoring Sources of Air Pollutants*, which permits the use of all credible evidence. Section 1.3(g) of this document states that “nothing. . . shall preclude the use, including the exclusive use, of any credible evidence or information.” Both the rule and referenced procedures are approved parts of Georgia's State Implementation Plan (SIP). Although the language in Condition 6.1.3 may appear to limit the use of credible evidence, EPA believes that this was not the intention of EPD and that such language does not ultimately limit the use of credible evidence because the Georgia SIP expressly prohibits such an exclusion.

“Nonetheless, for further clarification, EPD has added a general condition to the permit template which expressly states that nothing shall preclude the use of any credible evidence. This will ensure that such language will be included in the title V permits issued or renewed in the future by EPD.”

[Letter from Winston A. Smith, Director, Air Pesticide and Toxics Management Division, US EPA, to Robert Ukeily, Counsel for the Sierra Club, dated March 29, 2002]

1.4 CONDITION 8.15.1 IS NOT ONLY ENFORCEABLE BY THE STATE

Condition 8.15.1 is labeled as enforceable only by the state. However, this is actually a federal requirement contained in 42 U.S.C. § 7423. Therefore, this Condition should not be labeled as state only enforceable condition.

EPD Response:

42 U.S.C. § 7423, titled “Stack Heights”, does not relate to the circumvention of applicable standards which is the topic of Condition 8.15.1. Regardless, Condition 8.15.1 is directly from the Georgia Air Quality Rules. It is not part of Georgia's SIP nor is it an applicable federal regulation. Therefore, it has been appropriately classified as a State Only Enforceable condition.

1.5 GENERAL CONDITIONS WITHOUT SPECIFIC MONITORING AND REPORTING REQUIREMENTS ARE NOT ENFORCEABLE

Conditions 8.18.1 and 8.19.3 restrict opacity as required by Georgia Rules of Air Quality 391-3-1-.02(2)(b)1 and 391-3-1-.02(2)(d); and conditions 8.19.1, 8.19.2, and 8.21.1 restrict particulate matter emissions as required by Rules 391-3-1-.02(2)(d) and 391-3-1-.02(2)(e). These permit conditions are not enforceable as a practical matter because they do not identify particular emission units to which these requirements apply. Furthermore, it is not clear how these conditions are to be monitored. The permit should state explicitly to which emission units these conditions apply and how they are to be monitored and reported. Otherwise, such general conditions are not enforceable as a practical matter.

EPD Response:

All significant emission units are listed in Table 3.1 of the permit and their applicable emission limits and/or standards are contained in Sections 3.2, 3.3, and 3.4 of the permit. Any applicable monitoring and recordkeeping are in Sections 5.1, 5.2, 6.1, and 6.2 and have been explained in the permit narrative. Conditions 8.18.1, 8.9.1, 8.19.2, 8.19.3, and 8.21.1 are primarily intended to address non-significant emission units that may be listed in Appendix B of the permit. EPD has determined that no monitoring is necessary to provide reasonable assurance of compliance for these requirements.

SPECIFIC COMMENTS**2.1 PRATT'S VISY PAPER AND JET CORR SHOULD BE ISSUED A SINGLE PERMIT.**

Visy Paper and Jet Corr constitute a single Title V major source. Visy Paper and Jet Corr are located on the same property in adjacent, connected buildings, they have the same 2-digit SIC code, and the combined potential emissions of NO_x, CO, and VOC exceed 50, 100, and 50 tpy, respectively. It is not clear from the narratives and draft permits why EPD has agreed to issue separate permits.

EPD Response:

The Division agrees and already states in the narrative that Visy Paper and Jet Corr constitute a single Title V major source. The company requests two separate Title V permits for management purposes. According to the letter, dated August 12, 2002, the company states that the two facilities are under separate and distinct management teams, as well as operating as separate business units. Issuing separate Title V permits to Visy Paper and Jet Corr is allowed under Part 70 regulations and does not affect the fact they are still considered as one single Title V major source and other regulatory requirements. Thus, the Division remains its decision to issue them separate permits.

2.2 EMISSION CONTROLS ARE INSUFFICIENT.

The source is located in a non-attainment area for ozone. In other words, NO_x and VOC emissions should be highly restricted. They are not.

2.2.1 *The Jet Corr corrugator (JC02) produces estimated VOC emissions of 5 tpy (see the narrative, pages 9-10). These emissions are from "various kinds of cleaning agents that have VOC contents from 0 to 100%" (page 9). In view of the fact that the source-wide potential to emit VOC is 66.7 tpy (page 13), the Division should require Jet Corr to use cleaners that will not produce any VOC emissions. There is no indication in the narrative that such cleaners are non-existent.*

The Division has agreed that Georgia Air Quality Rule 391-3-1-.02(2)(mm) does not apply to VOC emissions of up to 9.51 tpy from the Flexo Folder Gluers FM01, FM02, FM05, FM06, and FM07 and the Rotary Die Cutters FM03 and FM04, "[b]ecause the total potential VOC emissions are less than 25 tpy" (page 11 of the narrative). The total potential emissions are in fact 66.7 tpy and the Division is not entitled to make any exceptions. [Actually, rule 391-3-1-.02(2)(mm) makes no reference to 25 tpy as a cutting point; but in any case Jet Corr should be required to reduce VOC emissions from FM01 through FM07.]

EPD Response:

As stated in this narrative, Jet Corr submitted a VOC RACT plan for Corrugator JC02 on October 26, 1998. It was approved by the Division, and no changes were made to SIP Permit No. 2679-247-0047-E-01-0. There were no legal challenges at that time. There was not even any legal challenge to this RACT determination after the issuance of SIP Permit Amendment No. 2679-247-0047-E-01-1 on January 29, 2001. Further, per conversation with Mr. Shauket Syed on August 30, 2001, the facility agrees to handle, convey, and store all VOC based cleaners in a manner which minimizes the risk of spillage or volatilization as some additional work to their existing RACT plan. These additional requirements were made into Conditions 2.4.1 to 2.4.3, and the facility was required to periodically monitor the associated operation according to Condition 6.2.3. Therefore, the Division does not intend to make any change to the pre-existing RACT determination for VOC emissions from Corrugator JC02.

Georgia Rule 391-3-1-.02(2)(mm)4. exempts facility with potential VOC emissions less than 25 tons per year from Rule (mm). The 25 tpy exemption threshold applies to emissions from graphic arts systems only. VOC emissions from other operations at the plant do not count toward Rule (mm) applicability. Since combined VOC emissions from Flexo Folder Gluers FM01, FM02, FM05, FM06, and FM07 and Rotary Die Cutters FM03 and FM04 are no more than 9.51 tpy, these units that apply ink on the paperboard are exempt from Rule (mm).

2.2.2 *The York Shipley boiler (JC01) has an estimated potential to emit 11.4 tpy of NOx. In view of the fact that the source-wide PTE for NOx amounts to 61.4 tpy, the Division should require the installation of a low NOx burner and a flue gas circulation system (as at Visy), if not a more effective pollution control device.*

EPD Response:

SIP Permit No. 2679-247-0047-E-01-0 that contained all NOx RACT requirements for Boiler JC01 was issued on October 23, 1998. There were no legal challenges at that time. Thus, the Division does not intend to make any change to the pre-existing RACT determination for NOx emissions from Boiler JC01.

2.3 ALL COMPLIANCE RECORDS SHOULD BE SUBMITTED TO THE DIVISION.

Title V is supposed to make it possible for the public to determine compliance with air pollution laws. The permit should therefore aim to provide unlimited access to all compliance records.

Conditions 6.2.3, 6.2.4, and 6.2.5 require the maintenance of records in a form suitable for inspection by or submission to the Division. Requiring the permittee to submit such records would make it possible for interested parties to view the data – without burdening the permittee with onerous tasks.

EPD Response:

Please refer to Comment No. 1.2 of this Addendum to Narrative for further discussion on this topic.

2.4 SECTION 112(r) PROBLEM.

Condition 7.10.1 is to apply “when and if the requirements of 40 CFR Part 68 become applicable.” In order to make the permit enforceable as a practical matter, the permit must state whether Section 112(r) applies. See IN THE MATTER OF KINGS PLAZA, ORDER RESPONDING TO PETITIONER’S REQUEST TO OBJECT, Petition No.: II-2003-03, at pp. 30-31, Issue 5.

EPD Response:

Condition 7.10.1 does not need to be changed.

Below are EPD's responses to comments from Pratt Industries (U.S.A.), Inc. – Jet Corr, Inc.

Comment No: 1 Section 1.3 Overall Facility Process Description:

“Jet Corr receives rolls of paper from Visy Paper, and then feeds them through a “Millogator Corrugating Machine.” The corrugator (ID No. JC02) glues layers of paper with a non-VOC, cornstarch based adhesive to produce a corrugated paper laminate. A 20.925 MM Btu/hr York Shipley Boiler (ID No. JC01) produces steam for drying the corrugated paper. Boiler JC01 fires natural gas, and is capable of firing No. 2 fuel oil during natural gas curtailment. The corrugated paper is either packed for shipping or further processed into printed boxes.

The facility installed five flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07) and two rotary die cutters (ID Nos. FM03 and FM04) to allow on-site printing in early 2001. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard.”

A request to modify process description in the “NOTICE OF THE OPPORTUNITY FOR PUBLIC COMMENT” was conveyed to you on the telephone on July 8, 2002, but we were told to hold corrections until we submitted our written comments, therefore, Jet Corr, requests that Section 1.3 in the Title V Air Quality Permit to be modified to read as follows:

“Jet Corr receives rolls of paper from Visy Paper, and then converts the rolls of paper to corrugated sheets on a Corrugator (ID No. JC02). The corrugator converts rolls of paper into a corrugated sheet, using a starch based adhesive. Three sheets of paper are joined by fluting the center sheet, applying starch to the tips of the flutes, and then adding the outside sheets by applying pressure and drying the adhesive. The product is trimmed and cut to size. The trim is recovered, baled, and recycled into the paper making process. A 20.925 MM Btu/hr York Shipley Boiler (ID No. JC01) produces steam for drying the corrugated paper. Boiler JC01 fires natural gas, and is capable of firing No. 2 fuel oil during natural gas curtailment. The corrugated sheets are either packed for shipping or are converted into boxes for delivery to clients.

The facility installed five flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07) and two rotary die cutters (ID Nos. FM03 and FM04) to allow on-site box making capability in early 2001. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard.”

A similar process description was also conveyed to the Agency in the permit applications.

EPD Response:

The Division has updated the permit in reference to the comment.

Comment No: 2 Section 3.4.1 of the draft air Permit states:

*“The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the corrugator (ID No. JC02), flexo folder gluers (ID Nos. FM01, FM02, FM05, FM06, and FM07), and rotary die cutters (ID Nos. FM03 and FM04), any gases which exhibit visible emissions, the opacity of which is equal to or greater than (40) percent.
[391-3-1-.02(2)(b)1.]”*

For Agency's information, these pieces of equipment do not have any stack, and there are no visible emissions from the equipment. Jet Corr, therefore, requests clarification as to what visible gases it is prohibited from emitting, and what, if any records must be maintained to document the lack of emissions.

EPD Response:

Georgia Rule 391-3-1-.02(2)(b)1. applies to any air contaminant source except when the source is subject to more restrictive rules. The Permit does not specify any monitoring requirements associated with Rule (b) for the emission units described above because these units are unlikely to emit significant visible emissions. Therefore, the facility is not required to maintain any records for Condition 3.4.1.

Comment No: 3 Section 3.4.3 of the draft air quality Permit states:

“The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the boiler (ID No. JC01), any gases which exhibit visible emissions, the opacity of which is equal to or greater than (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. [391-3-1-.02(2)(d)3.]”.

Jet Corr, understands that this requirement is only for the time when the boiler uses No. 2 fuel oil. In the absence of continuous monitoring system opacity will be determined by visual method when No. 2 fuel oil is in use. Further, we would like to request that Section 3.4.3 to be revised to read as follows:

“The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the boiler (ID No. JC01), any gases.... This standard shall apply at all times except periods of startup, shutdown, and malfunction of the boiler”.

EPD Response:

The Division denies the request. The requirement in Georgia Rule 391-3-1-.02(2)(d)3. applies regardless what type of fuel Boiler JC01 fires. The standard applies at all times including periods of startup, shutdown, and malfunction of the boiler. However, excess emissions resulting from startup, shutdown, and malfunction of the boiler are allowed under the circumstances specified in Georgia Rule 391-3-1-.02(2)(a)7.(i).

Comment No: 4 Section 3.4.4 of the draft permit

Section 3.4.4 of the draft air quality permit refers to the particulate emission from the equipment identified in the permit as ID No. JC02, and ID Nos. FM01, FM02, FM03, FM04. FM05, FM06, and FM07. This section requires that, for the purpose of determining compliance with the condition, each piece of equipment namely ID Nos. FM01, FM02, FM03, FM04. FM05, FM06, and FM07 must be considered as a separate process.

We have difficulty in understanding this requirement as the facility only has one Cyclone system installed in place with several inlets for pneumatic collection. It will not be possible to calculate particulate emissions separately for each piece of equipment. Therefore, we request that the calculation of particulate matter be linked to the corrugator or the cyclone.

EPD Response:

Georgia Rule 391-3-1-.02(2)(e)1.(i) applies to each individual process line and provides two equations for calculating PM allowable for each process line. Allowable PM emission is calculated for each process line identified above in this permit narrative. This narrative also states that PM emission from each of the process

line is minimal because of the nature of the process. Thus, the facility is not required to maintain any records for Condition 3.4.4.

Comment No: 5 Section 4.1.1 of the draft permit.

Jet Corr needs clarification as to what, if any, tests are required by this section. Our understanding after talking with you on July 8, 2002 is that no tests are required under this permit as currently written. Further, Section 4.2 in the draft permit states that there is no specific testing required.

EPD Response:

Condition 4.1.1 only reserves the right for the Division to request the facility to conduct a performance test when necessary. The facility is not required to conduct any test at this moment.

Comment No: 6 Section 5.1.1 of the draft air quality permit.

Section 5.1.1 needs clarification. It is our understanding there is no continuous monitoring system installed or required on the boiler. Therefore, the reference to section 391-3-1-.02(6)(b)1 under Section 5.1.1 is not appropriate. Further, several references to continuous monitoring system exist in the other parts of the draft air quality permit, including in Sections 6.1.4 and 6.1.6. We request that these references to continuous monitoring also be deleted.

EPD Response:

The request is denied. Conditions 5.1.1, 6.1.4, and 6.1.6 are all general conditions that appear in every Title V permit. Jet Corr does not have any continuous emission monitoring system currently, and is not required to install any by this Title V Permit.

Comment No: 7 Jet Corr Inc Title V Draft Permit Section 5.2.1 states:

"The Permittee shall install, calibrate, maintain, and operate natural gas and No. 2 fuel oil consumption meters on the York Shipley boiler (ID No.JC01) for measuring fuel usage. Meters shall be calibrated according to manufacturer's specifications and schedule. Meter calibrations shall be conducted at least once per year. [391-3-1-.02(6)(b)1.]".

The natural gas supply to Jet Corr, has a gas meter and a daily record of gas consumption is maintained. During the winter months this facility also uses space heaters. During summer time only the boiler is in use.

The facility has a contract with the natural gas supplying company for an uninterrupted natural gas supply. The boiler does not have a No. 2 fuel oil consumption meter and has never used No. 2 fuel oil since its installation. The boiler has a 500 gallon day tank that is connected to the No. 2 fuel oil tanks. The existing system has never been used, but in case we had to use it we would record our usage by the number of times we had to fill the day tank. In reality, if we ever have to use No. 2 fuel oil we would most likely not use the day tank. We would have a tanker dropped off from which we could pull and have a direct record of consumption from the tanker.

Jet Corr, therefore, requests that the requirement for installing a No. 2 fuel oil consumption meter in Section 5.2.1 be dropped as it will cause Jet Corr to incur substantial expense and will not assist in recording fuel usage. In case No. 2 fuel oil is ever used it will be logged per delivery notes and proper record shall be maintained on site. The request for Section 5.2.1 modification is in total conformance with the requirement specified for the reporting of fuel oil consumption in Section 6.2.2 of the draft permit.

EPD Response:

The Division denies the request. Condition 11 in SIP Permit No. 2679-247-0047-E-01-0, issued on October 23, 2002, has already required the facility to install, calibrate, maintain, and operate natural gas and No. 2 fuel oil consumption meter. 40 CFR 60.48c(g) requires the owner or operator of each affected facility (boiler) to record the amount of each fuel combusted everyday; and the consumption meters are required to provide fuel usage data. Condition 5.2.1 in this draft Permit is the same requirement as Condition 11 in SIP Permit No. 2679-247-0047-E-01-0. Besides, Condition 6.2.2 serves as the monitoring method that ensures the compliance of Condition 3.3.1 of this Permit. The facility has to record the data from the required fuel consumption meters and provide such data in accordance to Condition 6.2.4.

Comment No: 8 Section 5.2.2.b of the draft permit states:

“Within the first 20 hours operated after April 30, 2002, and within the first 20 hours operated after April 30, of each year thereafter, the Permittee shall measure the concentrations of NO_x and Oxygen (O₂) emitted from the boiler JC01. The measurement period shall consist of three (3) test runs with each test run for a duration of thirty minutes.”

The April 30, 2002 compliance deadline specified above does not coincide with the current draft permit review process. Therefore, Jet Corr respectfully requests an extension of the compliance deadline. Jet Corr also requests it be granted a reasonable amount of time to evaluate competitive alternatives to comply with this new condition and also to schedule the testing.

Further, the specified testing requirement in Section 5.2.2.b is very stringent. The concentration of NO_x and Oxygen (O₂) emissions from the boiler (JC01) is to be tested within 20 hours of operation commencing at the end of the day on April 30. This means that, no matter what day of the week it happens to be, between 12 midnight and 8 p.m. on May 1 we need to conduct three, thirty minute test runs for NO_x and O₂ concentrations to show that the emissions are below 0.2 lb/MMBtu.

We request that the requirement for testing of NO_x and O₂ within the first 20 hours operated after April 30 needs to be changed to require the testing be conducted during the month of May.

EPD Response:

Please refer to Comment No. 9 for the change that has been made in Condition 5.2.2.

Comment No: 9 Section 5.2.2.d of the draft air quality permit states:

“Following the initial measurement required in Condition 5.2.2.b, and the initial annual measurement each year thereafter, the Permittee shall conduct a measurement each calendar week that boiler JC01 is operated for more than eight (8) hours during the calendar week. Weekly measurements shall continue until three (3) consecutive weekly measurements are each less than the applicable NO_x Emissions limit of Condition 3.2.2. Following three (3) consecutive weekly measurements with measured NO_x emissions less than the applicable NO_x Emission limit, the Permittee shall conduct a measurement each calendar month. The monthly measurement shall not be required during months when the boiler operates less than 30 hours”.

It is our understanding that Section 5.2.2.d requires that, following the initial test each year, we must test the boiler weekly for a minimum of three weeks, and then monthly after that throughout the ozone season ending on September 30.

We request that the requirement specified in Section 5.2.2.d for additional testing during the control period be dropped in its entirety. The boiler has been in use for the last several years and has always been in compliance. The boiler is maintained and operated in the best possible professional manner to stay in compliance. By introducing this new testing schedule as specified in Section 5.2.2 the Agency is forcing the facility for an added expense of approximately \$30,000.00 to \$50,000.00 per year for a boiler that historically has operated in compliance. We therefore, request that Section 5.2.2.d be deleted.

EPD Response:

Condition 5.2.2 contains a protocol for monitoring NO_x emissions from the boiler using a portable emissions analyzer and the procedures of CTM –30; the condition is not a testing requirement and does not require the company to conduct emission tests using Reference Methods 7E and 3B(i.e., the test methods prescribed in Condition 4.1.3 for measuring NO_x emissions for the purpose of determining compliance with the NO_x emission limitation in Condition 3.2.2). The cost of a portable analyzer is in the range of \$12,000 to \$15,000 with very low annual operating costs. Since the analyzer, with proper care will not require extensive repair or replacement, this requirement is believed to be reasonable for this application.

Additionally, monitoring protocols utilizing the procedures of CTM 0030 and a prescribed measurement schedule have been required at a number of Title V facilities. However, in order to allow the company to reduce the frequency of measurements (dependant upon the level of measured emissions), Condition 5.2.2 is revised as shown in the attached modified conditions.

Comment No: 10 Section 5.2.2.e of the draft permit states:

“Following any measurement of the boiler JC01 which is greater than applicable NO_x Emissions limit of Condition 3.2.2, the Permittee shall conduct a new measurement within one unit operating day. Following this measurement, subsequent measurements shall be conducted in accordance with Condition 5.2.2.d until monthly measurements may be resumed.”

Please revise this Section based on our request stated in 5.2.2.d above to read as follows:

“Following any measurement of the boiler JC01 which is greater than applicable NO_x Emissions limit of Condition 3.2.2, the Permittee shall conduct a new measurement within two weeks.”

EPD Response:

The Division denies the request. Any measurement that shows NO_x emissions greater than the limit specified in Condition 3.2.2 would be considered an exceedance as specified in Condition 6.1.7.b.ii. The facility shall make adjustments to Boiler JC01 and conduct another measurement within one unit operating day to ensure the limit specified in Condition 3.2.2 is fully complied. The two week re-measuring period is not granted because the facility shall not let any exceedance to continue for two weeks. Please also refer to Comment No. 9 for related issues.

Comment No: 11 Section 5.2.2.f of the draft permit.

Please delete this Section based on our comment on Section 5.2.2.e above.

EPD Response:

Please refer to Comment Nos. 9 and 10 of this Addendum to Narrative for further discussion on this topic.

Comment No: 12 In Section 6.2.3 the last paragraph states that:

“The Permittee shall conduct an inspection at least once per shift of operator concerning items b and c. A log of the inspections shall be maintained in a permanent form suitable for inspection by or submitted to the Division.”

We strongly believe that the facility completely complies with the requirements as specified in Sections 6.2.3.b and 6.2.3.c. It is a standard industry practice to keep the lids on when these items are not in use. It is also not in the best interest of the facility to keep the lids off because it results in the drying of the product. However, we feel that the requirement as specified in the last paragraph in Section 6.2.3 is an unnecessary requirement to burden with the record keeping responsibility. Section 2.4 also covers and addresses this item therefore the additional monitoring and record keeping requirement specified in the last paragraph of Section 6.2.3 is not required. We, therefore, request that the last paragraph of Section 6.2.3 be deleted.

EPD Response:

The Division denies the request. Although it is the best interest of the facility to prevent any spill or loss of cleaners that contain VOC, the facility has to document their work practice and use the log to prove that they are in compliance with Condition 2.4.1 – 2.4.3. The Division only agrees to change the inspection requirement from once per shift to once per day.

Comment No: 13 Section 8.8.2 of the draft air Permit.

We need clarification in Section 8.8.2 as to what reports in particular need to go to EPA, if any, other than the Annual Compliance Certification required in Section 8.14.1 for submission to EPA.

EPD Response:

The facility only has to submit the Annual Compliance Certification required in Condition 8.14.1 to EPA. The facility does not have to submit reports required by Conditions 6.1.2 – 6.1.4 to EPA. In addition, the facility has to submit written notifications to EPA, as required in Conditions 7.1.1 and 7.2.1, if the facility plans to make any Section 502(b)(10) or off-permit change.

Comment No: 14 Section 8.14.3.c of the draft air permit.

We need clarification that Section 8.14.3.c will shelter Jet Corr from enforcement action for failure to complete sampling or testing required under other sections of the permit while the application is pending.

EPD Response:

The facility is not obligated to conduct any sampling or testing prior to the effective date of the Permit. Every inconsistency in that regard that was in the draft Permit has been addressed.

Below are the modified conditions of Draft Title V Permit No. 2679-247-0047-V-02-0.

PART 1.0 FACILITY DESCRIPTION

1.3 Overall Facility Process Description

Jet Corr receives rolls of paper from Visy Paper, and then feeds them through a “Millogator Corrugating Machine.” **converts the rolls of paper to corrugated sheets on a Corrugator (ID No. JC02).** The corrugator (~~ID No. JC02~~) ~~glues layers of paper with a non-VOC, cornstarch based adhesive to produce a corrugated paper laminate.~~ **converts rolls of paper into a corrugated sheet, using a starch based adhesive. Three sheets of paper are joined by fluting the center sheet, applying starch to the tips of the flutes, and then adding the outside sheets by applying pressure and drying the adhesive. The product is trimmed and cut to size. The trim is recovered, baled, and recycled into the paper making process.** A 20.925 MM Btu/hr York Shipley Boiler (ID No. JC01) produces steam for drying the corrugated paper. Boiler JC01 fires natural gas, and is capable of firing No. 2 fuel oil during natural gas curtailment. The corrugated ~~paper is sheets are~~ either packed for shipping or ~~further processed into printed boxes are converted into boxes for delivery to clients.~~

The facility installed five flexo folder gluers (ID Nos. FM01, FM02, and FM05-FM07) and two rotary die cutters (ID Nos. FM03 and FM04) to allow on-site **printing box making capability** in early 2001. The flexo folder gluers apply both ink and glue to the boxboard. The rotary die cutters only apply ink (in the same manner as the flexo folder gluers) and cut slits or holes in the boxboard.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

5.2.2 The Permittee shall monitor the emissions of nitrogen oxides (NO_x) from the boiler JC01. This requirement shall apply from May 1 through September 30 of each year. The monitoring shall be conducted according to the following plan:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Measurements of nitrogen oxides and oxygen concentrations shall be conducted using the procedures of Gas Research Institute Method GRI-96/0008, EPA/EMC Conditional Test Method (CTM-30) *Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers.*
- b. ~~Within the first 20 hours operated after April 30, 2002, and within the first 20 hours operated after April 30, of each year thereafter, the Permittee shall measure the concentrations of NO_x and Oxygen (O₂) emitted from the boiler JC01. The measurement period shall consist of three (3) test runs with each test run for a duration of thirty minutes.~~

- b. Within the first 168 hours operated after April 30 of each year or by May 30 of each year, whichever comes first, the Permittee shall measure the concentrations of NO_x and Oxygen (O₂) emitted from the boiler JC01. The measurement period shall consist of one (1) test run thirty (30) minutes in duration.**
- c. The nitrogen oxides emission rate shall be computed for each run using the following equation:

$$E = K C_d F_d (20.9) / (20.9 - \%O_2)$$

E = emission rate of pollutant, (lb/million Btu)

K = conversion factor for nitrogen oxides = 1.194×10^{-7} ((lb/scf)/ppm)

C_d = concentration of pollutant, (ppm)

%O₂ = oxygen concentration, percent dry basis

F_d = factor as determined from Method 19

F-factor for natural gas, 8,710 dscf/MM Btu

F-factor for No. 2 fuel oil, 9,190 dscf/MM Btu

- ~~d. Following the initial measurement required in Condition 5.2.2.b., and the initial annual measurement each year thereafter, the Permittee shall conduct a measurement each calendar week that boiler JC01 is operated for more than eight (8) hours during the calendar week. Weekly measurements shall continue until three (3) consecutive weekly measurements are each less than the applicable NO_x Emissions limit of Condition 3.2.2. Following three (3) consecutive weekly measurements with measured NO_x emissions less than the applicable NO_x Emission limit, the Permittee shall conduct a measurement each calendar month. The monthly measurement shall not be required during months when the boiler operates less than 30 hours.~~
- e. ~~Following any measurement of the boiler JC01 which is greater than applicable NO_x Emissions limit of Condition 3.2.2, the Permittee shall conduct a new measurement within one unit operating day. Following this measurement, subsequent measurements shall be conducted in accordance with Condition 5.2.2.d. until monthly measurements may be resumed.~~
- d. If the initial (May of each year) measurement or any subsequent measurement (i.e., any measurement made during the ozone season of each year) of Nitrogen oxides emissions is equal to or greater than 0.2 pounds per million Btu, the Permittee shall make adjustments to the boiler and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows the Nitrogen Oxides emissions to be less than 0.2 pounds per million Btu.**
- e. If the initial (May of each year) measurement or any subsequent measurement (i.e., any measurement made during the ozone season of each year) of Nitrogen Oxides emissions is equal to or greater than 0.15 pounds per million Btu, but less than 0.2 pounds per million Btu, a measurement shall be conducted each calendar month during the Ozone season until a measurement shows the Nitrogen oxides to be less than 0.15 pounds per million Btu.**

f. If any measurement of the Nitrogen Oxides emissions, made during May or June (of each year), is than 0.15 pounds per million Btu, the Permittee shall conduct a second measurement after July 1 but before August 30. If any measurement of the Nitrogen Oxides emissions, made during July or August, is less than 0.15 pounds per million Btu , no further measurements of Nitrogen Oxides emissions are required except as required by Condition 5.2.2 d.

~~f. A unit operating day shall be defined as a day that the unit is operated for more than 30 minutes between 12:00 midnight and the following midnight.~~

g. A unit operating day shall be defined as a day that the unit is operated for more than 30 minutes between 12:00 midnight and the following midnight.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.2 Specific Record Keeping and Reporting Requirements

6.2.3 The permittee shall adhere to the following work practice plan:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Reasonable precautions shall be taken to minimize spills during the handling and transfer of cleaners containing volatile organic compounds (VOCs) from containers, tanks, vats, vessels, and piping systems.
- b. Cleaners containing VOC shall be stored in sealed containers.
- c. All VOC waste containers shall be equipped with tight fitting lids.

The Permittee shall conduct an inspection at least once per ~~shift~~ **day** of operator concerning items b and c. A log of the inspections shall be maintained in a permanent form suitable for inspection by or submitted to the Division.