Facility Name: **Georgia-Pacific Savannah River LLC**
City: Rincon
County: Effingham
AIRS #: 04-13-10300007

Application #: TV-717253
Date Application Received: January 30, 2023
Permit No: 2621-103-0007-V-06-0

Program	Review Engineers	Review Managers
SSPP	Heather Brown	Wendy Troemel
ISMU	Marcus Cureton	Dan McCain
SSCP	Bremie Lindner	Bethany Dillard
Toxics	Sherry Waldron	William Fleming
Permitting Program Manager		Steve Allison

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The 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: Georgia-Pacific Savannah River LLC

2. Parent/Holding Company Name

Georgia-Pacific Consumer Operations LLC

3. Previous and/or Other Name(s)

Georgia-Pacific Consumer Operations LLC – Savannah River Mill
Georgia-Pacific Consumer Products LP – Savannah River Mill
Georgia-Pacific Corporation Savannah River Mill
Fort James Savannah River Mill
Fort Howard Corporation

4. Facility Location

The facility is located at 437 Old Augusta Road South, Rincon, Georgia 31326.

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2621-103-0007-V-05-0	8/3/2018	Title V Renewal Permit (TV-44103)
2621-103-0007-V-05-0	8/3/2018	Ownership/name change from Georgia-Pacific Consumer Products LP – Savannah River Mill to Georgia-Pacific Consumer Operations LLC – Savannah River Mill (TV-200144)
Off-Permit Change	8/31/2018	Installation and operation of a new tissue converting line (TV-26677)
Off-Permit Change	11/15/2018	Removal of Flexographic Printer No. 5 (TV-26814)

2621-103-0007-V-05-1	12/27/2018	Minor modification without construction to add wastewater treatment residuals as a fuel for Boilers BO01 and BO03 (TV-228870)
Off-Permit Change	2/7/2019	Removal of combustion turbine backup engine EE02 (TV-26931)
Off-Permit Change	8/19/2019	Installation and operation of an additional towel converting line (TV-27157)
Off-Permit Change	12/3/2019	Removal of Flexographic Printer No. 6 (TV-27303)
Off-Permit Change	6/10/2020	Replacement of roof cooling towers (TV-27549)
Off-Permit Change	8/20/2020	Upgrade of screening operations on Bleaching System 4 (TV-27618)
Off-Permit Change	8/28/2020	Various upgrades to the paper machines and converting lines (TV-27632)
Off-Permit Change	1/27/2021	Replacement of the pulpers (TV-27820)
Off-Permit Change	4/12/2021	Removal of the Paper Machine 20 winder and upgrades to the converting line (TV-27908)
2621-103-0007-V-05-2	4/26/2021	Significant modification with construction for the revision of paper machine limits and the installation and operation of new scrubbers. (TV-443474)
2621-103-0007-V-05-3	1/31/2022	Name change from Georgia-Pacific Consumer Operation LLC – Savannah River Mill to Georgia-Pacific Savannah River LLC (TV-619264)
2621-103-0007-V-05-4	7/11/2022	502(b)(10) for the installation and operation of two additional napkin converting lines and Flexographic Printer Nos. 7 and 8 (TV-28379)
Off-Permit Change	2/19/2024	Temporary replacement of CT01 engine (TV-29202)
2621-103-0007-V-05-5	6/14/2024	Replacement of CT01 engine (TV-29296)

D. Process Description

1. SIC Codes(s)

2621 – Paper Mills

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures tissue, towels, and napkins from recycled wastepaper and/or virgin pulp.

3. Overall Facility Process Description

Pulp and Bleaching
Pulp is manufactured from various grades of wastepaper. The pulp processing area pulps, deinks, cleans, and bleaches wastepaper to a specific level of brightness determined by product and customer specifications. The breakdown of wastepaper occurs in the agitation process inside high consistency batch or continuous drum pulpers when combined with water. During the pulping stage, the wastepaper breaks down into a slurry (referred to as stock or pulp).

The stock is then passed to a screening system that removes plastic, latex, sand, clay, metal, and other contaminants. After the removal of the larger contaminants, coatings, ash, and inks are removed from the stock by washing and deinking. These cleaning/screening processes help prevent these contaminants from being included in the final tissue, towel, and napkin products. The stock may then be bleached using sodium borohydride, sodium hydrosulfite, and hydrogen peroxide. The final stage of bleaching is washing the stock to remove residual chemicals. This stock is pumped to storage tanks for use on the paper machines.

The mill is also capable of using purchased virgin pulp to meet various paper quality and customer specifications. The purchased virgin fiber is added to pulpers along with the recycle furnish (wastepaper) or via separate piping.

Paper Machines
Pulp stock is processed through one of five paper machines to produce commercial and retail grades of tissue, towel, and napkins. Various chemical additives are used when processing the pulp stock to enhance runnability and give the finished product different properties required for each product. Examples include the use of wet strength resin in paper towels to make the product strong when wet, or release agents that help prevent the product from sticking to the Yankee dryer roll as it is processed on the paper machine. Chemical cleaning agents are used on the paper machine “clothing” (felts and wires) to remove the build-up of contaminants (e.g., stickies) that form over time from the use of secondary fiber.

Each of the paper machines has a steam-heated Yankee dryer section to reduce the moisture content of the product before it is removed from the paper machine on the associated wind-up reel. Each paper machine also has a hood system that contains two gas-fired burners that supply heat to assist in drying the paper sheet. Paper Machine 17 has after-dryers that use steam to complete the final drying step for the finished paper product. Several paper machines have wet scrubbers installed on the reel and/or winder.

Converting and Printing
The finished paper rolls from the paper machines are sent to the converting area where the paper is converted to tissue, towel, and napkin products. Some of the parent rolls may be printed on flexographic printers prior to conversion into finished product. This area of the mill also uses purchased core stock to make cores for toilet paper and paper towel rolls. The finished paper products are packaged and prepared for off-site shipment via truck.

Utilities
The facility operates several combustion units to provide steam, and electrical power to the production operations. There are two primary power boilers, one combustion turbine with waste heat boiler, and two natural gas-fired boilers.

The power boilers are circulating fluidized bed boilers with a heat input rating of 422 MMBtu/hr each and are equipped with baghouses to control particulate matter emissions and limestone injection systems to control sulfur dioxide emissions. Steam from the power boilers feeds a common header, which serves two steam turbine generators that are each rated at 45 MW of electrical power. The power boilers are permitted to fire a number of different fuels including: petroleum coke; bituminous coal; peat; no. 2 fuel oil; natural gas; wood; wastewater treatment residuals (WWTR); and tire-derived fuel (TDF).

The facility maintains several different outdoor storage piles for coal, petroleum coke, and limestone that are fed as fuels or chemical reduction agents (limestone) to the boilers. These materials are delivered to the mill by railcar or by truck and are transported to the storage piles with the use of mechanical conveyors. The coal and petroleum coke are processed through a granulator to reduce them to the proper size for firing before these materials are sent to storage silos. The coal, petroleum coke, and limestone are then fed to the boilers from the storage silos. The bottom and fly ash from the boilers is collected in storage silos and sent to the mill's onsite landfill or used for beneficial reuse as approved by the appropriate regulatory agencies. Sand is used in the power boilers as a bed material and is stored in a bin.

Steam and electrical power are provided to the mill via a combustion turbine that is equipped with a waste heat boiler. The turbine may also generate power that can be sold to the local utility grid. The facility is limited by its permit to selling less than one-third of its total produced electrical power and does not exceed this limit. The combustion turbine can generate 15 MW of power. The waste heat boiler burner is rated at 86 MMBtu/hr. The combustion turbine is capable of firing natural gas or no. 2 fuel oil and the waste heat boiler is capable of burning natural gas. The waste heat boiler cannot be operated independently of the turbine.

The facility also operates two 93.4 MMBtu/hr natural gas-fired boilers.

Ancillary Operations
In addition to main process operations, there are other ancillary operations at the mill with the potential to generate air emissions. The mill operates a wastewater treatment plant to process the wastewater from the pulp processing and the paper machines areas. The wastewater treatment residuals (WWTR) and boiler ash may be landfilled on site, beneficially reused as approved by the appropriate regulatory agencies, or burned in the boilers as approved by appropriate regulatory agencies (WWTR only). Portions of the gases generated from the breakdown of organic matter in the closed portions of the sludge disposal landfill are collected and combusted in a flare.

The mill grinds wooden pallets for use as a boiler fuel and paper cores for recycling back into the pulping process. A number of raw materials necessary to mill processes are stored in tanks. The mill also has a number of reciprocating internal combustion (RICE) engines onsite, including engines designated for emergency use.

Warehouse
In addition to the main production facility, a separate division of Georgia-Pacific LLC owns a warehouse across the street from the Savannah River Mill. The Rincon Warehouse stores some of the final products produced at the mill, as well as products from other locations. With the exception of an emergency fire pump engine and small diesel tanks, there are no regulated sources of emissions at the warehouse.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Georgia-Pacific Savannah River LLC is a major source under PSD. The facility has accepted the following PSD limits:

a. Fuel oil sulfur for all sources is limited to 0.05 percent sulfur, by weight.
b. Emissions of SO_2 from Boiler No. 3 are limited to 491.4 pounds per hour.
c. Emissions of SO_2 from Boiler No. 5 are limited to 381.5 pounds per hour.
d. Emissions of NO_X from Boiler No. 3 or 5 are limited to 0.4 pounds per MMBtu heat input.
e. Emissions of NO_X from the combination of Combustion Turbine No. 1 and Waste Heat Boiler No. 1 are limited to 105.0 pounds per hour.
f. Emissions of VOC from the bleaching operations, chemical additive usage, and solvent usage in the Pulp Processing Area and Bleaching System Nos. 2 through 4 are limited to less than 201.3 tons combined during any consecutive 12-month period.
g. The Sodium Bisulfite Tank shall be operated in accordance with the most recently approved good operating practices plan.
h. Emissions of PM/PM_{10} from Paper Machines 16 through 20 are limited to less than 12.5/17.0, 22.4/26.0, 17.0/23.3, 28.9/26.8, and 22.2/18.0 tons per consecutive 12-month period, respectively.

i. Emissions from Paper Machine No. 17 are limited to 0.005 pounds total PM/PM_{10} per MMBtu heat input, 0.0007 pounds SO_2 per MMBtu heat input, 0.036 pounds NO_X per MMBtu heat input, 0.184 pounds CO per MMBtu heat input, and 0.006 pounds VOC per MMBtu heat input.
j. Emissions of VOC from Paper Machine No. 2 are limited to less than 0.0067 pounds per MMBtu/hr heat input.
k. Emissions of VOC from chemical additives and solvent from Paper Machine Nos. 16 through 20 are limited to less than 206.3 tons combined during any consecutive 12-month period.
l. Only natural gas may be burned in the dryer burners for Paper Machine Nos. 16 through 20.

The facility has accepted the following limits to avoid PSD:

a. Fuel oil sulfur for all sources is limited to 0.05 percent sulfur, by weight.

2. Title V Major Source Status by Pollutant

Table 2: 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}	✓	✓		
$PM_{2.5}$	✓	✓		
SO_2	✓	✓		
VOC	✓	✓		
NO_x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The flexographic printers are subject to 40 CFR 63 Subpart KK – National Emission Standards for the Printing and Publishing Industry.

The converting operations are subject to 40 CFR 63 Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

The combustion turbine is subject to 40 CFR 63 Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. There are no specific emission standards that the combustion turbines must meet.

The mill operates engines that are subject to 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The fluidized bed boilers and rental boilers are subject to 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	Yes
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps: None applicable.

B. Applicable Rules and Regulations: None applicable.

C. Compliance Status: Not applicable.

D. Permit Conditions: None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BO01	Boiler No. 3 (Circulating Fluidized Bed)	40 CFR Part 52.21 40 CFR 60 Subpart D 40 CFR 60 Subpart Db 40 CFR 63 Subpart DDDDD 40 CFR 61 Subpart E 40 CFR 64 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	LS01 BH01	Limestone Feed System Baghouse
BO03	Boiler No. 5 (Circulating Fluidized Bed)	40 CFR Part 52.21 40 CFR 60 Subpart Db 40 CFR 63 Subpart DDDDD 40 CFR 61 Subpart E 40 CFR 64 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	LS03 BH03	Limestone Feed System Baghouse
CT01	Combustion Turbine No. 1	40 CFR Part 52.21 40 CFR 60 Subpart GG 391-3-1-.02(2)(d)	None	None
WHB1	Waste Heat Boiler No. 1	40 CFR Part 52.21 391-3-1-.02(2)(d)	None	None
RGB01	Rental Gas Boiler 1	40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
RGB02	Rental Gas Boiler 2	40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
PULP	Pulp Processing Area	40 CFR Part 52.21	None	None
FP05 FP06 FP08	Bleaching System No. 2 Bleaching System No. 3 Bleaching System No. 4	40 CFR Part 52.21	None	None
BT01	Sodium Bisulfite Tank	40 CFR Part 52.21	None	None
PM01	Paper Machine No. 16	40 CFR Part 52.21 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB14 SB16	Winder Scrubber Reel Scrubber
PM02	Paper Machine No. 17	40 CFR Part 52.21 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
PM03	Paper Machine No. 18	40 CFR Part 52.21 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB13 SB15	Winder Scrubber Reel Scrubber
PM04	Paper Machine No. 19	40 CFR Part 52.21 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB04 SB11	Reel Scrubber Winder Scrubber
PM05	Paper Machine No. 20	40 CFR Part 52.21 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB05 SB08 SB12	Reel Scrubber Winder Scrubber Bypass Winder Scrubber

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
CONV	Converting Operation	40 CFR Part 52.21 40 CFR 63 Subpart JJJJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB06 SB07 SB09 SB10	Venturi Scrubber Venturi Scrubber Venturi Scrubber Venturi Scrubber
FX07 FX08	Flexographic Printer No. 7 Flexographic Printer No. 8	40 CFR 63 Subpart KK	None	None
SHS	Granulator	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
FS01	Fuel Silo No.1 – Boiler No. 3	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH11	Baghouse
FS02	Fuel Silo No. 2 – Boiler No. 3	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH12	Baghouse
FS03	Fuel Silo No. 3 – Boiler No. 3	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH13	Baghouse
FS08	Fuel Silo No. 1 – Boiler No. 5	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH20	Baghouse
FS09	Fuel Silo No. 2 – Boiler No. 5	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH21	Baghouse
FS10	Fuel Silo No. 3 – Boiler No. 5	40 CFR 60 Subpart Y 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH22	Baghouse
LM01	Limestone Silo No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH14	Baghouse
LM03	Limestone Silo No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH23	Baghouse
ME01	Murphy Engine 1	40 CFR 63 Subpart ZZZZ 40 CFR 60 Subpart IIII 391-3-1-.02(2)(b)	None	None
ME02	Murphy Engine 2	40 CFR 63 Subpart ZZZZ 40 CFR 60 Subpart IIII 391-3-1-.02(2)(b)	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Equipment Removed from Permit:
The following equipment has been decommissioned and has not been included in this renewal permit:

- Boiler No. 4 (Source Code BO02) with Limestone Feed System LS02 and Baghouse BH02;
- Combustion Turbine No. 2 (Source Code CT02);
- Waste Heat Boiler No. 2 (Source Code WHB2);
- Flexographic Printers No. 5 and 6 (Source Codes FX05 and FX06);
- Fuel Silo Nos. 1 through 4 – Boiler No. 4 (Source Codes FS04 through FS07) and Baghouses BH15 through BH18;
- Fuel Dryer Nos. 1 through 4 – Boiler No. 4 (Source Codes FD01 through FD04) and Baghouses BH24 through BH27;
- Limestone Silo No. 2 (Source Code LM02) and Baghouse BH19; and
- Compressor Engines (Source Code CE01).

Emission and Operating Caps:
The facility is allowed to sell only one-third of its potential electrical output capacity. This limit is for the avoidance of 40 CFR 60 Subpart Da and the avoidance of Acid Rain provisions.

Boiler No. 3 (Source Code BO01) and Boiler No. 5 (Source Code BO03) are capable of burning TDF. Each boiler is limited to burning no more than 84 tons per day.

Emission and operating caps related to PSD and PSD Avoidance are listed in Section I.E.1 of this narrative.

All of the emission and operating caps discussed above have been carried over from the previous permit.

Rules and Regulations Assessment:
Boiler No. 3 (Source Code BO01) is a circulating fluidized bed boiler rated at 422 MMBtu/hr. The unit was manufactured in 1986 and was installed in 1987. The boiler is permitted to burn coal, petroleum coke, peat, wood, no. 2 fuel oil, tire-derived fuel (TDF), and wastewater treatment residuals (WWTR). The boiler is equipped with a limestone feed system and a baghouse for emissions control. The boiler is subject to the following rules and regulations:

- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: This boiler is classified as a coal/solid fossil fuel fluidized bed unit. The boiler is subject to limits for hydrogen chloride (HCl), mercury (Hg), carbon monoxide (CO), and filterable particulate matter (PM) or Total Selected Metals (TSM). The facility has elected to comply with the TSM limit rather than the PM limit. Lower revised limits for HCl, Hg, and PM apply beginning on October 6, 2025. The subpart specifies operating limits and parameters based on the control method used and startup and shutdown work practice requirements. Finally, the boiler is subject to periodic performance testing and must have a tune-up every 5 years.

- 40 CFR 60 Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators: According to 40 CFR 60.40b(b)(2), coal-fired boilers meeting the applicability requirements of 40 CFR 60 Subpart D must comply with SO_2 limits under 40 CFR 60 Subpart D and PM/NO_X limits under 40 CFR 60 Subpart Db. The SO_2 limits under 40 CFR 60 Subpart D are 1.2 lb/MMBtu of heat input while burning solid fuel, 0.8 lb/MMBtu of heat input while burning liquid fuel or liquid fuel and wood, and a prorated limit for periods when solid and liquid fuels are burned simultaneously.

- 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: The applicability date for 40 CFR 60 Subpart Db is June 19, 1984. As discussed above, the boiler is subject to 40 CFR 60 Subpart Db for NO_X and PM standards. The subpart limits NO_X emissions to a prorated value between 0.2 and 0.6 lb/MMBtu based on the amount and type of fuel burned. The subpart also limits PM emissions to 0.051 lb/MMBtu and limits opacity to 20 percent, except for one 6-minute period of not more than 27 percent.

- 40 CFR 64 – Compliance Assurance Monitoring: The boiler is subject to CAM for SO_2 and PM emissions.

- 40 CFR 61 Subpart E – National Emission Standard for Mercury: The subpart specifies that mercury emissions from the boiler cannot exceed 7.1 pounds per 24-hour period while burning wastewater treatment residuals. The facility conducted sampling in October 2013 and the results were below the detection limit (0.16 lb/day). While the regulation remains applicable, the facility has completed the compliance demonstration and no further requirements apply.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The boiler is subject to a more restrictive, unit specific limit under 40 CFR 60 Subpart Db and Georgia Rule (d).

- 391-3-1-.02(2)(d) – Fuel-Burning Equipment: Rule (d) limits PM emissions and opacity from the boiler. The Rule (d) PM limit, 0.10 lb/MMBtu, is subsumed by the more stringent 40 CFR Subpart Db limit. The opacity limit in the rule is the same as the limit found in 40 CFR 60 Subpart Db.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content and SO_2 emissions based on fuel type and heat input. The limits are the same as those found in 40 CFR 60 Subpart D.

Boiler No. 5 (Source Code BO03) is a circulating fluidized bed boiler rated at 422 MMBtu/hr. The unit was manufactured and installed in 1995. The boiler is permitted to burn coal, petroleum coke, peat, wood, no. 2 fuel oil, natural gas, TDF and WWTR. The boiler is equipped with a limestone feed system and a baghouse for emissions control. The boiler is subject to the following rules and regulations:

- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: This boiler is classified as a coal/solid fossil fuel fluidized bed unit. The boiler is subject to limits for hydrogen chloride (HCl), mercury (Hg), carbon monoxide (CO), and filterable particulate matter (PM) or Total Selected Metals (TSM). The facility has elected to comply with the TSM limit rather than the PM limit. Lower revised limits for HCl, Hg, and PM apply beginning on October 6, 2025. The subpart specifies operating limits and parameters based on the control method used and startup and shutdown work practice requirements. Finally, the boiler is subject to periodic performance testing and must have a tune-up every 5 years.

- 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: The applicability date for 40 CFR 60 Subpart Db is June 19, 1984. The boiler is subject to 40 CFR 60 Subpart Db for SO_2, PM, opacity, and NO_X standards. 40 CFR 60 Subpart Db limits SO_2 emissions to 10 percent of the potential SO_2 emission rate or to a prorated value between 0.8 and 1.2 lb/MMBtu based on the amount and type of fuel burned. The subpart limits PM emissions to 0.051 lb/MMBtu and limits opacity to 20 percent, except for one 6-minute period of not more than 27 percent. 40 CFR 60 Subpart Db limits NO_X emissions to a prorated value between 0.2 and 0.6 lb/MMBtu based on the amount and type of fuel burned.

- 40 CFR 64 – Compliance Assurance Monitoring: The boiler is subject to CAM for SO_2 and PM emissions.

- 40 CFR 61 Subpart E – National Emission Standard for Mercury: The subpart specifies that mercury emissions from the boiler cannot exceed 7.1 pounds per 24-hour period while burning wastewater treatment residuals. The facility conducted sampling in October 2013 and the results were below the detection limit (0.16 lb/day). While the regulation remains applicable, the facility has completed the compliance demonstration and no further requirements apply.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The boiler is subject to a more restrictive, unit specific limit under 40 CFR 60 Subpart Db and Georgia Rule (d).

- 391-3-1-.02(2)(d) – Fuel-Burning Equipment: Rule (d) limits PM emissions and opacity from the boiler. The PM limit, 0.10 lb/MMBtu, is subsumed by the more stringent 40 CFR 60 Subpart Db limit. The opacity limit in the rule is the same as the limit found in 40 CFR 60 Subpart Db.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content and SO_2 emissions based on fuel type and heat input. The limits are subsumed by the limits found in 40 CFR 60 Subpart Db.

Combustion Turbine No. 1 (Source Code CT01) was manufactured in 1986 and was installed in 1987. Combustion Turbine No. 1 is rated at 220 MMBtu/hr and 15 MW. The jet engine component of the turbine was replaced in 2024. The engine was previously rated to 290 MMBtu/hr and 23 MW. The unit is permitted to burn natural gas and no. 2 fuel oil. The turbine is not equipped with a control device. The unit is subject to the following rules and regulations:

- 40 CFR 60 Subpart GG – Standards of Performance for Stationary Gas Turbines: The applicability date for the subpart is October 3, 1997 and it applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr. 40 CFR 60.332(d) limits NO_X emissions in terms of percent per volume based on the equation 0.0150 (14.4/Y) + F where Y is the heat rate and F is the fuel-bound nitrogen allowable. The subpart also limits the fuel sulfur content to 0.8 percent, by weight. The fuel sulfur content limit is subsumed by a more stringent PSD limit of 0.05 percent, by weight.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. However, the combustion turbine vents directly to the Waste Heat Boiler, which is subject to a more stringent limit. Rule (b) has not been included in the permit for the combustion turbine for this reason.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content and SO_2 emissions based on fuel type and heat input. The limits in Rule (g) are 3 percent sulfur, by weight, and 0.8 lb SO_2/MMBtu. Both of these limits are subsumed by the PSD limit that restricts fuel sulfur content to 0.5 percent, by weight.

Georgia Rule (d) – Fuel-Burning Equipment was not intended to apply to combustion turbines. However, Rule (d) is included in the equipment list because the turbine vents directly to the Waste Heat Boiler, which is subject to the rule.

The combustion turbine is subject to 40 CFR 63 Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. There are no specific emission standards that the combustion turbines must meet.

Waste Heat Boiler No. 1 (Source Code WHB1) was manufactured in 1986 and was installed in 1987. The boiler is tied to the combustion turbine, cannot be operated independently of it, and they share a stack. The boiler unit is rated at 86 MMBtu/hr and is permitted to burn only natural gas. The units are not equipped with control devices and are subject to the following rules and regulations:

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The waste heat boiler is subject to a more restrictive, unit specific limit under Rule (d).

- 391-3-1-.02(2)(d) – Fuel-Burning Equipment: Rule (d) limits PM emissions (in terms of lb/MMBtu) to $0.5(10/R)^{0.5}$ where R is the heat input in MMBtu/hr. Rule (d) limits opacity to 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content based on heat input. The limit in Rule (g) is 2.5 percent sulfur, by weight. This limit is subsumed a PSD limit that restricts fuel sulfur content to 0.05 percent, by weight.

The waste heat boiler is not subject to 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The waste heat boiler is excluded from this subpart because it is considered part of the combustion turbine, which is a 40 CFR 60 Subpart GG unit. The waste heat boiler is not included in the definition of a boiler under Subpart DDDDD.

The waste heat boiler is not subject to 40 CFR 60 Subpart Dc – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units because it was constructed before the applicability date of June 9, 1989. The waste heat boiler is not large enough to be subject to 40 CFR 60 Subpart D or Db.

Rental Gas Boilers 1 and 2 (Source Codes RGB01 and RGB02) in 2017. They are each rated at less than 100 MMBtu/hr, burn only natural gas, and are used as stand-by units during maintenance and/or unplanned boiler or combustion turbine shutdowns. The rental boilers are subject to the following rules and regulations:

- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. These boilers are considered "temporary boilers;" however, the facility may keep them in the same location for more than the 12-consecutive month period as allowed by Subpart DDDDD. Therefore, they are subject to Boiler MACT. Tune-ups will be conducted according to the procedures defined in 40 CFR 63.7540(a)(10)(i) through (vi). The boilers are not subject to emission limits under the subpart.

- 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Subpart Dc contains PM, opacity, and SO_2 limits for boiler constructed after June 9, 1989, with a heat input equal to or greater than 10 MMBtu/hr and less than 100 MMBtu/hr. No emission limits apply to the rental boilers because they are only permitted to burn natural gas. The facility is required to keep fuel usage records under the regulation.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The waste heat boiler is subject to a more restrictive, unit specific limit under Rule (d).

- 391-3-1-.02(2)(d) – Fuel Burning Equipment: Rule (d) limits PM emissions (in terms of lb/MMBtu) to $0.5(10/R)^{0.5}$ where R is the heat input in MMBtu/hr. Rule (d) limits opacity to 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content and SO_2 emissions based on fuel type and heat input. This rule is subsumed by the requirement to burn only natural gas.

The Pulp Processing Area (Source Code PULP) was installed in 1985. The area is not equipped with a control device. The equipment is subject to a PSD limit but is not subject to any specific rule or regulation.

Bleaching System Nos. 2 through 4 (Source Codes FP05, FP06, and FP08) were originally installed in 1986. The systems are not equipped with control devices. The equipment is subject to a PSD limit but is not subject to any specific rule or regulation.

The Sodium Bisulfite Tank (Source Code BT01) was installed in 2010. The tank is not equipped with a control device. The equipment is subject to a PSD requirement, but it is not subject to any specific rule or regulation.

Paper Machine Nos. 16 through 20 (Source Codes PM01 through PM05) were installed in 1987, 1988, 1989, 1991, and 1998, respectively. Paper Machines Nos. 16 through 20 have natural gas burners rated at 64, 70, 50, 50, and 60 MMBtu/hr, respectively. All of the paper machines, with the exception of Paper Machine No. 17 have scrubbers for emissions control and/or safety and minimizing employee exposure to dust. The machines are subject to the following rules and regulations:

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.

- 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: Rule (e) limits PM from a source based on the process input weight.

- 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits fuel sulfur content based on heat input. The limit in Rule (g) is 2.5 percent sulfur, by weight. This limit is subsumed by the PSD requirement that the paper machine dryers burn only natural gas.

The Converting Operation (Source Code CONV) was installed in 1985. The operation is equipped with four scrubbers. The units are subject to the following rules and regulations:

- 40 CFR 63 Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating: The subpart lists several options for minimizing HAP emissions from coating operations. The facility has elected to limit organic HAP to no more than 4 percent of the mass of coating materials applied each month.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.

- 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: Rule (e) limits PM from a source based on the process input weight.

Flexographic Printer Nos. 7 and 8 (Source Codes FX07 and FX08) were installed in 2022 and 2023, respectively. The printers are not equipped with control devices. The units are subject to the following regulation:

- 40 CFR 63 Subpart KK – National Emission Standards for the Printing and Publishing Industry: The subpart lists several options for minimizing HAP emissions from the printing operations. The facility has elected to limit organic HAP usage to 400 kilograms per month. The printers are not subject to Georgia Rule (mm) – VOC Emissions from Graphic Arts Systems due to the exemption under 391-3-1-.02(2)(a)6(i)(I).

The Granulator (Source Code SHS) was installed in 1987. The unit is not equipped with a control device. The unit is subject to the following rules and regulations:

- 40 CFR 60 Subpart Y – Standards of Performance for Coal Preparation and Processing Plants: The subpart limits the opacity from coal processing and conveying equipment, coal storage system, and coal transfer and loading system to less than 20 percent. The subpart applies to sources that process more than 200 tons of coal per day and which were constructed after October 27, 1974. The facility began processing more than 200 tons per day of coal on June 14, 2011. The provisions of Subpart Y do not apply to processing petroleum coke.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The equipment is subject to a more restrictive, unit specific limit under 40 CFR 60 Subpart Y.

- 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: Rule (e) limits PM from a source based on the process input weight.

The Fuel Silos (Source Codes FS01 through FS03 and FS08 through FS10) were installed in 1987 (for Boiler No. 3) and 1995 (for Boiler No. 5). Each silo is equipped with a baghouse for control of PM emissions. The units are subject to the following rules and regulations:

- 40 CFR 60 Subpart Y – Standards of Performance for Coal Preparation and Processing Plants: The subpart limits the opacity from coal processing and conveying equipment, coal storage system, and coal transfer and loading system to less than 20 percent. The subpart applies to sources that process more than 200 tons of coal per day and which were constructed after October 27, 1974. The facility began processing more than 200 tons per day of coal on June 14, 2011. The provisions of Subpart Y do not apply to processing petroleum coke.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent. The fuel silos are subject to a more restrictive, unit specific limit under 40 CFR 60 Subpart Y.

- 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: Rule (e) limits PM from a source based on the process input weight.

The Limestone Silos (Source Codes LM01 and LM03) were installed in 1987 and 1986, respectively. Each silo is equipped with a baghouse for the control of PM emissions. The silos are subject to the following rules and regulations:

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.

- 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: Rule (e) limits PM from a source based on the process input weight.

Murphy Engines 1 and 2 (Source Codes ME01 and ME02) are 144 hp compression engines used to operate equipment that process wastewater treatment plant residuals. They were manufactured in 2014 and installed in 2016. They are subject to the following rules and regulations:

- 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: The subpart contains emission limits and maintenance activities the facility must complete depending on the size of the engine being used and the emergency or non-emergency status. The subpart directs the facility to comply with 40 CFR 60 Subpart IIII.

- 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

- 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.

The facility operates several emergency engines that are classified as stationary sources. The details for the engines are summarized in the table below. The engines are insignificant activities and are not included in the equipment list.

Source Code	Engine Description	Classification	Size (hp)	Type	Manufacture or Install Date
EE01	Fire Pump Engine	Emergency	231	Compression[1]	1987
EE03	Mill Radio Backup Engine	Emergency	42.1	Spark[1]	2000
WE01	Warehouse Fire Pump Engine	Emergency	190	Compression[2]	2017/2018

[1]NSPS does not apply due to construction date. [2]Subject to 40 CFR 60 Subpart IIII.

C. Permit Conditions

The following conditions have been carried over from the previous permit unless otherwise noted.

Condition 3.2.1 allows the facility to avoid electric utility steam generating regulations and Acid Rain regulations by limiting the amount of power sold to the grid to no more than one-third of the potential output capacity.

Condition 3.2.2 is an equipment-wide fuel oil sulfur content limit. The limit serves to minimize SO_2 emissions from fuel burning sources.

Conditions 3.2.3 and 3.2.4 are PSD limits that specify the maximum SO_2 emission rate (lb/hr) permitted from Boiler No. 3 and Boiler No. 5. Condition 3.2.4 has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 3.2.5 is a PSD limit that specifies the maximum NO_X emissions rate (lb/MMBtu) for each of Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 3.2.6 is a PSD limit that specifies the maximum NO_X emissions rate (lb/hr) for the Combustion Turbine No. 1/Waste Heat Boiler No. 1 combined. The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 3.2.7 is a combined VOC limit for the Pulp Processing Area and Bleaching System Nos. 2 through 4 under the provisions of PSD.

Condition 3.2.8 requires the facility to operate the Sodium Bisulfite Tank in accordance with the plan submitted to the Division. This plan was established under the provisions of PSD.

Condition 3.2.9 specifies PM and PM_{10} limits for each individual paper machine. The original condition in Air Quality Permit No. 2621-103-0007-V-05-0 included only PM limits for Paper Machine No. 16 through 19. The condition was modified in Amendment No. 2621-103-0007-V-05-2 to revise the paper machine limits and to authorize the operation of new scrubbers. The purpose of the amendment was to address and incorporate new data obtained through internal and external sources. The PM limits were revised as necessary and additional limits were established for PM_{10}. The revised calculations also included limits for Paper Machine No. 20. Compliance with the limits is based on production limits for each machine. The amendment also revised production limits as necessary. The Amendment No. 2621-103-0007-V-05-2 version of the condition has been included in this renewal.

Condition 3.2.10 includes PSD limits for PM/PM_{10}, SO_2, NO_X, CO, and VOC emissions from the Paper Machine No. 17 dryer burners.

Condition 3.2.11 is a PSD limit for VOC emissions from the Paper Machine No. 20 dryer burners.

Condition 3.2.12 is a combined PSD limit for total VOC emissions from Paper Machine Nos. 16 through 20.

Condition 3.2.13 limits the fuel burned in Paper Machine Nos. 16 through 20 dryer burners to natural gas only. This limit was a result of a PSD project.

Condition 3.2.14 requires the facility to maintain ROAD F-C as a paved road in order to minimize PM_{10} emissions. The condition was added to the permit in Amendment No. 2621-103-0007-V-05-2 as part of the paper machine PM/PM_{10} limit revision project discussed above for Condition 3.2.9. The paving is necessary for compliance with PSD Increment modeling. The condition has been updated for the renewal to remove project notification requirements that have been met.

Condition 3.3.1 is the general applicability statement for 40 CFR 63 Subparts A and DDDDD for Boiler No. 3, Boiler No. 5, Rental Gas Boiler 1, and Rental Gas Boiler 2. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4. The condition also been updated for the renewal to roll in reference to Rental Gas Boilers 1 and 2 rather than maintaining two separate conditions.

Condition 3.3.2 is the general applicability statement for 40 CFR 60 Subparts A and Dc for Rental Gas Boilers 1 and 2.

Condition 3.3.3 is the general applicability statement for 40 CFR 60 Subparts A and D for Boiler No. 3.

Condition 3.3.4 is the general applicability statement for 40 CFR 60 Subparts A and Db for Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 3.3.5 is the general applicability statement for 40 CFR 61 Subpart A and E for Boiler Nos. 3 and 5. The condition was added to the permit in Amendment No. 2621-103-0007-V-05-1. The purpose of the amendment was to permanently add wastewater treatment residuals (WWTR) as a fuel option for the boilers. The suitability of WWTR as a fuel had been determined through trial burns in March 2018. The condition has been included in the renewal permit.

Condition 3.3.6 and 3.3.7 specify the HCl, Hg, CO, and PM/TSM limits for Boiler Nos. 3 and 5 under 40 CFR 63 Subpart DDDDD. Condition 3.3.6 has been carried over from the previous permit with the exception of removing reference to decommissioned Boiler No. 4 and updating the citation references for the for the pre-October 6, 2025, limits. Condition 3.3.7 has been added to the renewal permit to include the Subpart DDDDD limits that take effect on October 6, 2025. On that date, the facility will be subject to lower limits for HCl, Hg, and PM. TSM and CO limits will remain the same.

Conditions 3.3.8 and 3.3.9 specify how the facility must comply with 40 CFR 63 Subpart DDDDD through control device specific operating parameters for Boiler Nos. 3 and 5. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 3.3.10 specifies the startup and shutdown provisions under 40 CFR 63 Subpart DDDDD for Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 3.3.11 specifies the Hg limit under 40 CFR 61 Subpart E for Boiler Nos. 3 and 5. The limit was added to the permit in Amendment No. 2621-103-0007-V-05-1 when WWTR was added as a permanent fuel option for the boiler as discussed for Condition 3.3.5 above. The condition has been included in this renewal permit.

Condition 3.3.12 specifies the SO_2 limits under 40 CFR 60 Subpart D for Boiler No. 3. The condition has been updated for the renewal to match the "equal to or in excess of" language in Georgia Rule (g), whereas the language previously read "in excess of".

Condition 3.3.13 specified the SO_2 limit for Boiler No. 5 under 40 CFR 60 Subpart Db. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4 and to specify that petroleum coke is included in the definition of coal for Subpart Db.

Conditions 3.3.14 through 3.3.16 specify the PM, opacity, and NO_X limits under 40 CFR 60 Subpart Db for Boiler Nos. 3 and 5. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4. Condition 3.3.16 has been updated to specify that petroleum coke is included in the definition of coal for Subpart Db.

Conditions 3.3.17 and 3.3.18 are the general applicability statement and the NO_X limit for Combustion Turbine No. 1 under 40 CFR 60 Subpart GG. The conditions have been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2.

Conditions 3.3.19 through 3.3.21 are the general applicability statement and organic HAP limit for the Converting Operation under 40 CFR 63 Subpart JJJJ. The limit applies to coatings materials used in the paper making process.

Conditions 3.3.22 and 3.3.23 are the general applicability statement and organic HAP limit for the Flexographic Printers under 40 CFR 63 Subpart KK.

Conditions 3.3.24 and 3.3.25 are the general applicability statement and opacity limit for coal handling operations under 40 CFR 60 Subpart Y. The conditions have been updated for the renewal to note that petroleum coke is not included in the definition of coal for Subpart Y.

Conditions 3.3.26 and 3.3.27 are the general applicability statements for 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII, which apply to Murphy Engines 1 and 2. Condition 3.3.27 has been added in this renewal permit for completeness purposes.

Conditions 3.4.1 and 3.4.2 are the general opacity and PM limits under Georgia Rules (b) and (e). The rules apply to all process equipment unless a more stringent limit applies through another rule or regulation.

Conditions 3.4.3 and 3.4.3 specify the fuels that can be burned in Boiler Nos. 3 and 5. Both conditions appeared in Air Permit No. 2621-103-00007-V-05-0 and were then modified in Amendment No. 2621-103-0007-V-05-1 to add reference to WWTR as a permanent fuel for both boilers.

Condition 3.4.5 limits the amount of TDF that can be burned each day in Boiler Nos. 3 and 5. The purpose of the limit is to ensure that emission limits are met.

Condition 3.4.6 specifies that the facility can burn only natural gas or no. 2 fuel oil in Combustion Turbine No. 1 and natural gas in Waste Heat Boiler No. 1. The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 3.4.7 specifies the opacity limit for the combined Combustion Turbine No. 1 / Waste Heat Boiler No. 1 under Georgia Rule (d). The combustion turbine is technically not subject to Rule (d); however it shares a stack with the waste heat boiler, which is subject to Rule (d). The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 3.4.8 specifies the PM limit for Waste Heat Boiler No. 1 under Georgia Rule (d). The condition has been updated for the renewal to remove reference to decommissioned Waste Heat Boiler No. 2.

Conditions 3.4.9 and 3.4.10 are the PM/opacity limits under Georgia Rule (d) for Rental Gas Boilers 1 and 2 and specify the units can only burn natural gas.

Part 3.0 – Conditions No Longer Included in the Permit

Conditions 3.2.14, 3.2.15, 3.3.14, 3.3.15, 3.3.18, 3.3.19, 3.4.4, and 3.4.10 of Air Permit No. 2621-105-0007-V-05-0 have not been carried over to this permit. The conditions referred to the Compressor Engines (Source Code CE01), Flexographic Printer Nos. 5 and 6 (Source Codes FX05 and FX06), Fuel Dryer Nos. 1, 2, 3, and 4 (Source Codes FD01 through FD04), and Boiler No. 4 (Source Code BO02). The equipment has been decommissioned.

Condition 3.4.11 of Air Permit No. 2621-103-0007-V-05-0 has not been carried over to this permit. The condition was the opacity limit under Georgia Rule (b) for the Murphy Engines. The requirement is already included in Condition 3.4.1 of the permit and does not need to be repeated.

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

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

The following conditions have been carried over from the previous permit unless otherwise noted.

Condition 4.1.3 specifies the test methods the facility should use to demonstrate compliance with emission and opacity limits. The condition appeared in Air Permit No. 2621-103-0007-V-05-0 and was modified in Amendment No. 2621-103-0007-V-05-4 to include updated test methods for 40 CFR 63 Subpart JJJJ. The condition has been updated for the renewal to include test methods under 40 CFR 63 Subpart DDDDD.

Condition 4.2.1 specifies the periodic PM testing requirements for Boiler Nos. 3 and 5 under the provisions of Georgia Rule (d) and NSPS regulations. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Conditions 4.2.2 through 4.2.4 specifies the tune-up, periodic performance testing, and fuel analysis provisions for 40 CFR 63 Subpart DDDDD limits for Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 4.2.5 requires the facility to conduct NO_X testing for Combustion Turbine No. 1 within 180 days of the engine replacement permitted in 2024. The language was added to the permit in Amendment No. 2621-103-0007-V-05-5 and has been carried over to this renewal permit.

Conditions 4.2.6 and 4.2.7 specify the testing and reporting requirements for 40 CFR 63 Subpart JJJJ. Condition 4.2.7 was added to the permit in Amendment No. 2621-103-0007-V-05-4 to update the permit for completeness purposes. The condition has been carried over to this renewal permit.

Part 4.0 – Conditions No Longer Included in the Permit

Condition 4.2.3 of Air Permit No. 2621-103-0007-V-05-0 included testing requirements for Fuel Dryer Nos. 1 through 4 (Source Codes FD01 through FD04) under 40 CFR 60 Subpart 60 Subpart Y. The language is not included in the permit because the equipment has been decommissioned.

Condition 4.2.7 of Amendment No. 2621-103-00047-V-05-1 was added to the permit when the facility was permitted to burn WWTR on a permanent basis. The condition required the facility to sample the WWTR to demonstrate compliance with 40 CFR 61 Subpart E. The sampling requirement has been met; therefore, the condition has not been included in this renewal permit.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

The following conditions have been carried over from the previous permit unless otherwise noted.

Condition 5.2.1.a requires the facility to operate NO_X and SO_2 CEMS for Boiler Nos. 3 and 5. The monitors are used to demonstrate compliance with limits under PSD, 40 CFR 60 Subparts D and Db, and Georgia Rule (g). The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 5.2.1.b requires the facility to operate COMS for Boiler Nos. 3 and 5. The COMS is used to demonstrate compliance with opacity limits under 40 CFR 60 Subpart Db and Georgia Rule (d). The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 5.2.1.c requires the facility to operate NO_X CEMS for the combined Combustion Turbine No. 1 / Waste Heat Boiler No. 1 stack. The CEMS is used to demonstrate compliance with the emission PSD limit. The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 5.2.2.a allows the facility to operate stack flow meters for Boiler Nos. 3 and 5 for the purpose of demonstrating compliance with the pound per hour SO_2 limits in Part 3.0. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 5.2.2.b requires the facility to continuously monitor outlet temperature for Combustion Turbine No. 1 to demonstrate compliance with the provisions of 40 CFR 60 Subpart GG. The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2.

Condition 5.2.3.a requires the facility to record the types and quantity of fuel burned in the different fuel burning sources on site. The data is used to demonstrate compliance with PSD, 40 CFR 60 Subpart Db, and 40 CFR 60 Subpart GG. The condition has been updated for the renewal to remove decommissioned Boiler No. 4, Combustion Turbine No. 2, and Waste Heat Boiler No. 2.

Condition 5.2.3.b requires the facility to measure pressure drop for the baghouses on Boiler Nos. 3 and 5. The data is used to demonstrate compliance with PM limits under 40 CFR 60 Subpart Db and Georgia Rule (d). The language has been updated for the renewal to specify recording data at least a “minimum” of once per day because the facility’s data acquisition system can record the data more frequently. The language also specifies at an average of continuous readings is acceptable.

Condition 5.2.3.c requires the facility to record paper production data for each Paper Machine once per day. The data is used to comply with paper production limits, which are a surrogate for PM limits under PSD. The condition appeared in Air Permit No. 2621-103-0007-V-05-0 for Paper Machine Nos. 16 through 19. The condition was modified in Amendment No. 2621-103-0007-V-05-2 to add reference to Paper Machine No. 20 as part of the machine PM limit revision project. The modified condition has been carried over to this renewal permit.

Condition 5.2.3.d requires the facility to monitor pressure drop and scrubbant flow rate for scrubbers on Paper Machine No. 19 and the Trim Line Collection System (part of the Coverting Operation). Proper operation of the scrubbers is necessary to comply with PSD and Georgia Rules (b) and (e). The condition appeared in Air Permit No. 2621-103-0007-V-05-0 and was modified in Amendment No. 2621-103-0007-V-05-2 to update scrubber references for the PM limit revision project. The modified condition has been carried over to this renewal permit. The language has been updated for the renewal to specify recording data at least a "minimum" of once per shift because the facility's data acquisition system can record the data more frequently. The language also specifies at an average of continuous readings is acceptable.

Condition 5.2.3.e requires the facility to monitor pressure drop and scrubbant flow rate for the BRT14 scrubbers (part of the Converting Operations). Proper operation of the scrubbers is necessary to comply with PSD and Georgia Rules (b) and (e). The language has been updated for the renewal to specify recording data at least a "minimum" of once per shift because the facility's data acquisition system can record the data more frequently. The language also specifies at an average of continuous readings is acceptable.

Condition 5.2.3.f requires the facility to monitor pressure drop and scrubbant flow rate for Scrubber SB11 on Paper Machine No. 19. Proper operation of the scrubber is necessary to comply with PSD and Georgia Rules (b) and (e). The language has been updated for the renewal to specify recording data at least a "minimum" of once per shift because the facility's data acquisition system can record the data more frequently. The language also specifies at an average of continuous readings is acceptable.

Condition 5.2.3.g requires the facility to monitor pressure drop and scrubbant flow rate for scrubbers on Paper Machine Nos. 16 and 18. Proper operation of the scrubbers is necessary to comply with PSD and Georgia Rules (b) and (e). The condition was added to the permit in Amendment No. 2621-103-0007-V-05-2 to include additional scrubbers related to the PM limit revision project. The modified condition has been carried over to this renewal permit. The language has been updated for the renewal to specify recording data at least a "minimum" of once per shift because the facility's data acquisition system can record the data more frequently. The language also specifies at an average of continuous readings is acceptable.

Condition 5.2.4 specifies how the facility should calculate pound per hour SO_2 emissions from Boiler Nos. 3 and 5 using the SO_2 CEMS and the stack flow monitors. The calculations are necessary to demonstrate compliance with PSD limit. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Conditions 5.2.5 and 5.2.6 are continuous compliance requirements for Boiler Nos. 3 and 5 under the provisions of 40 CFR 63 Subpart DDDDD. Condition 5.4.6 has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Conditions 5.2.7 requires the facility to perform quarterly accuracy determination and daily calibration drift test for the CEMS at the facility. Proper maintenance of the CEMS ensures that emissions data is accurate.

Conditions 5.2.8 through 5.2.10 specify the data collection and handling requirements for the SO_2 CEMS on Boiler No. 5 under the provisions of 40 CFR 60 Subpart Db. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Conditions 5.2.11 and 5.2.12 specify the data collection and handling requirements for the NO_X CEMS on Boiler Nos. 3 and 5 under the provisions of 40 CFR 60 Subpart Db and PSD. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 5.2.13 specifies the definition of a steam generating unit-operating day under 40 CFR 60 Subpart Db, which applies to Boiler Nos. 3 and 5.

Condition 5.2.14 requires the facility to maintain a Preventative Maintenance Program for the facility baghouses. The purpose of the program is to ensure baghouses are kept in good working order and that any malfunctions are minimized.

Condition 5.2.15 requires the facility to perform visible emission checks for baghouses associated with the Fuel Silos and Limestone Silos. The purpose of the monitoring is to verify the baghouses are in good working order. The condition has been updated to the renewal to remove reference to decommissioned Boiler No. 4 Fuel Silos (Source Code FS04 through FS07), Limestone Silo No. 1 (Source Code LM02), and Fuel Dryer Nos. 1 through 4 (Source Codes FD01 through FD04). The condition has been updated for the renewal to allow the use of a camera for the VE checks.

Part 5.0 – Conditions No Longer Included in the Permit

Condition 5.2.2.b of Air Permit No. 2621-103-0007-V-05-0 referred to monitoring for Fuel Dryer Nos. 1 through 4 (Source Code FD01 through FD04) and has not been included in this renewal permit. The equipment has been decommissioned.

Condition 5.2.14 of Air Permit No. 2621-103-0007-V-05-0 referred to monitoring for the Compressor Engines (Source Code CE01) and has not been included in this renewal permit. The equipment has been decommissioned.

C. Compliance Assurance Monitoring (CAM)

The facility is subject to CAM for PM and SO_2 for Boiler Nos. 3 and 5 and for PM from Paper Machine Nos. 19 and 20.

Condition 5.2.16 is the CAM summary table. The condition appeared in Air Permit No. 2621-103-0007-V-05-0. It was modified in Amendment No. 2621-103-0007-V-05-2 as part of the PM limit revision project to note that scrubber SB04 would be replaced. The replacement is complete. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4 and to remove reference to the completed SB04 replacement.

Condition 5.2.17 is the PM CAM requirements for Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4. The condition has also been updated for the renewal to allow the facility to use continuous pressure drop readings collected by the data acquisition system.

Condition 5.2.18 is the SO_2 CAM requirements for Boiler Nos. 3 and 5. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 5.2.19 is the PM CAM requirements for Paper Machine No. 19 and 20. The condition appeared in Air Permit No. 2621-103-0007-V-05-0. It was modified in Amendment No. 2621-103-0007-V-05-2 as part of the PM limit revision project to note that scrubber SB04 would be replaced. The replacement is complete. The condition has been updated for the renewal to remove reference to the completed SB04 replacement. The condition has also been updated for the renewal to allow the facility to use continuous pressure drop and scrubbant flow rate information collected by the data acquisition system.

VI. 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 information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a quarterly basis.

B. Specific Record Keeping and Reporting Requirements

The following conditions have been carried over from the previous permit unless otherwise noted.

Condition 6.1.7.a.i specifies the excess emission reporting requirements for SO_2 emissions from Boiler No. 3 under 40 CFR 60 Subpart D and Georgia Rule (g). The condition has been updated for the renewal to correct the language to “equal to or exceeds” to match the Georgia Rule (g) language.

Conditions 6.1.7.a.ii and iii. specify the excess emissions reporting requirements for NO_X and opacity under 40 CFR 60 Subpart Db for Boiler Nos 3 and 5. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 6.1.7.a iv specifies the excess emission reporting requirement for Combustion Turbine No. 1 under 40 CFR 60 Subpart GG.

Condition 6.1.7.b.i specifies the exceedance reporting requirement for sale of power to any utility power distribution system. The limit is for the avoidance of regulations related to power production for the grid.

Condition 6.1.7.b.ii specifies the exceedance reporting requirement for no. 2 fuel oil burned at the facility.

Condition 6.1.7.b.iii specifies the exceedance reporting requirement for the SO_2 PSD limit for Boiler No. 3.

Conditions 6.1.7.b.iv through vi. specify the exceedance reporting requirements for SO_2 from Boiler No. 5 under the provisions of PSD and 40 CFR 60 Subpart Db. The conditions have been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 6.1.7.b.vii specifies the exceedance reporting requirements for NO_X from Boiler Nos. 3 and 5 under the provisions of PSD. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 6.1.7.b.viii specifies the exceedance reporting requirement for burning TDF in Boiler Nos. 3 and 5.

Condition 6.17.b.ix is the exceedance reporting requirement for NO_X from the combined Combustion Turbine No. 1 / Waste Heat Boiler No. 1 stack under PSD. The condition has been updated for the renewal to remove reference to decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 6.1.7.b.x is the exceedance reporting requirement for any time a unit burns a fuel outside of those listed in Part 3.4 of the permit. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4, Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Condition 6.1.7.b.xi is the exceedance reporting requirement for VOC emissions from the Pulp Processing Area and the Bleaching Systems under PSD.

Condition 6.1.7.xii is the exceedance reporting requirement for paper production on Paper Machine Nos. 16 through 20. The condition appeared in Air Permit No. 2621-103-0007-V-05-0 and was modified to include Paper Machine No. 20 and to update the production limits as part of the Amendment No. 2621-103-0007-V-05-2 PM limit revision project. The modified condition has been carried over to this renewal permit.

Condition 6.1.7.b.xiii is the exceedance reporting requirement for VOC emissions from Paper Machine Nos. 16 through 20 under a PSD limit.

Condition 6.1.7.b.xiv is the exceedance reporting requirement for the use of organic HAP coating materials used in the Converting Operation. This is a provision of 40 CFR 63 Subpart JJJJ.

Condition 6.1.7.b.xv is the exceedance reporting requirement for the use of organic HAP containing materials in Flexographic Printer Nos. 7 and 8. This is a provision of 40 CFR 63 Subpart KK. The language was added to the permit in Amendment No. 2621-103-0007-V-05-4 for construction and operation of the units. The condition has been carried over into this renewal permit.

Conditions 6.1.7.c.i through iv. are the excursion reporting requirements for baghouse pressure drop monitoring, baghouse preventative maintenance program activities, and visible emission checks. The section has been updated for the renewal permit to remove reference to decommissioned Baghouses BH02 and BH24 through BH27.

Condition 6.1.7.c.v is the excursion reporting requirements for various scrubbers operated by the facility. A portion of the language was modified in Amendment No. 2621-103-0007-V-05-2 to reflect scrubber replacements and additional scrubbers permitted as part of the PM limit revision project. The condition has been updated for the renewal to remove notifications for scrubber SB04 that have been met, update the operating parameter values for scrubbers SB04, SB13, SB14, and SB15, and to consolidate all of the scrubber reporting requirements at the facility into a single condition.

Condition 6.1.7.d.i requires the facility to provide statements certifying that all of the no. 2 fuel oil burned at the facility meets the 0.05 percent sulfur by weight limit. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4, Combustion Turbine No. 2, Waste Heat Boiler No. 2, and the Compressor Engines.

Condition 6.1.7.d.ii requires the facility to provide steam generating unit operating day records required by 40 CFR 60 Subpart Db for Boiler Nos. 3 and 5 as part of the quarterly report.

Condition 6.2.1 requires the facility to maintain records of the amount of power sold to verify the provisions of 40 CFR 60 Subpart Da and Acid Rain have not been triggered.

Condition 6.2.2 requires the facility to maintain fuel supplier statements that demonstrate fuel oil burned at the facility contains no more than 0.05 percent sulfur by weight. The records are necessary to demonstrate compliance with PSD, PSD avoidance, and 40 CFR 60 Subpart GG limits.

Conditions 6.2.3 through 6.2.5 specify record keeping and reporting requirements under 40 CFR 63 Subpart DDDDD. Condition 6.2.3 has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 6.2.6 specifies the fuel usage records the facility must keep for Rental Gas Boilers 1 and 2 under 40 CFR 60 Subpart Dc.

Conditions 6.2.7 requires the facility to maintain steam generating unit-operating day records for SO_2 from Boiler No. 5 under the provisions of 40 CFR 60 Subpart Db. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Conditions 6.2.8 requires the facility to maintain steam generating unit-operating day records for NO_X from Boiler Nos. 3 and 5 under the provisions of 40 CFR 60 Subpart Db. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4.

Condition 6.2.9 requires the facility to maintain fuel usage records and to calculate annual capacity factors for fuel burned in Boiler Nos. 3 and 5 as required by 40 CFR 60 Subpart Db. The condition has been updated for the renewal to remove reference to decommissioned Boiler No. 4. The condition has also been updated to include pet coke, as it meets the definition of coal under 40 CFR 60 Subpart Db.

Condition 6.2.10 requires the facility to maintain records of the weight of TDF burned in Boiler Nos. 3 and 5 to demonstrate compliance with the limit in Part 3.4 of the permit.

Condition 6.2.11 requires the facility to maintain records of the type of fuel burned in Combustion Turbine No. 1, Waste Heat Boiler No. 1, and Paper Machine Nos. 16 through 20 to demonstrate compliance with the limits in Part 3.0 of the permit. The condition has been updated for the renewal to remove decommissioned Combustion Turbine No. 2 and Waste Heat Boiler No. 2.

Conditions 6.2.12 through 6.2.15 require the facility to maintain production, chemical additive, and cleaning solvent records for the Pulp Processing Area, the Bleaching Systems, and the Paper Machines. The facility must use the records to calculate VOC emissions to demonstrate compliance with the VOC PSD limits in Part 3.0 of the permit.

Condition 6.2.16 requires the facility to operate the Sodium Bisulfite Tank in accordance with the good operating practices to comply with PSD.

Condition 6.2.17 requires the facility to calculate 12-month rolling totals for paper production for Paper Machine Nos. 16 through 20. The condition appeared in Air Permit No. 2621-103-0007-V-05-0 for Paper Machine Nos. 16 through 19. The condition was modified in Amendment No. 2621-103-0007-V-05-2 as part of the PM limit revision project. This involved updating the paper production limits and adding a limit for Paper Machine No. 20. The records are used to demonstrate compliance with the PM PSD limits in Part 3.0 of the permit. The modified condition has been carried over into this renewal permit.

Conditions 6.2.18 and 6.2.19 require the facility the maintain records and submit semiannual reports for organic HAP usage under the provisions of 40 CFR 63 Subpart JJJJ for the Converting Operation. Condition 6.2.19 was updated to include paragraph e.iii for completeness purposes.

Condition 6.2.20 requires the facility to maintain records for the organic HAP applied on Flexographic Printer Nos. 7 and 8 in accordance with 40 CFR 63 Subpart KK.

Conditions 6.2.21 and 6.2.22 require the facility to submit installation/startup and operating parameter notifications for scrubbers related to the Amendment No. 2621-103-0007-V-05-2 PM limit revision project. The conditions have been carried over to this renewal permit.

Conditions 6.2.23 through 6.2.26 require the facility maintain records and submit reports related to the Combustion Turbine No. 1 engine replacement that was permitted in Amendment No. 2621-103-0007-V-05-5. The records and reports are required under PSD provisions in cases where a facility uses an actual to projected actual calculation method.

Part 6.0 – Conditions No Longer Included in the Permit

Condition 6.1.7.a.v of Air Permit No. 2621-103-0007-V-05-0 referred to temperature monitoring for Combustion Turbine No. 2. The equipment has been decommissioned and the condition does not appear in this renewal permit.

Condition 6.1.7.b.vi of Air Permit No. 2621-103-0007-V-05-0, which referenced Flexographic Printer Nos. 5 and 6, was deleted in Amendment No. 2621-103-0007-V-05-4 due to decommissioning.

Condition 6.1.7.b.xix referred to the mercury limits for the combustion of WWTR. The language was added to the permit in Amendment No. 2621-103-0007-V-05-1 when WWTR was added as a permanent fuel under 40 CFR 61 Subpart E. The facility has completed sampling and demonstrated emissions were less than the test method detection limit. The exceedance limit is no longer necessary.

Conditions 6.1.7.b.xvi through xviii. of Air Permit No. 2621-103-0007-V-05-0 referred to the decommissioned Compressor Engines. The conditions have not been included in this permit.

Condition 6.1.7.c.ii of Air Permit No. 2621-103-0007-V-05-0 referred to Fuel Dryer Nos. 1 through 4, which have been decommissioned. The condition has not been included in this permit.

Conditions 6.2.9 and 6.2.10 of Air Permit No. 2621-103-0007-V-05-0 referred to PSD analysis records and reports for a Paper Machine No. 20 project. The 10-year obligation for the information ended in 2022; therefore, the conditions have not been included in the renewal permit.

Condition 6.2.18 of Air Permit No. 2621-103-0007-V-05-0, which referenced Flexographic Printer Nos. 5 and 6, was deleted in Amendment No. 2621-103-0007-V-05-4 due to decommissioning.

Conditions 6.2.19 and 6.2.20 of Air Permit No. 2621-103-0007-V-05-0 referred to the decommissioned Compressor Engines. The conditions have not been included in this permit.

Condition 6.2.25 of Air Permit No. 2621-103-0007-V-05-0 referred to ongoing mercury sampling for the combustion of WWTR. The language was added to the permit in Amendment No. 2621-103-0007-V-05-1 when WWTR was added as a permanent fuel under 40 CFR 61 Subpart E. The facility has completed sampling and demonstrated emissions were less than the test method detection limit. The condition is no longer necessary.

Conditions 6.2.26 through 6.2.29 and 6.2.31 through 6.2.34 of Amendment No. 2621-103-0007-V-05-2 were added to the permit to require installation/startup/operating parameter notifications for the scrubbers related to the PM limit revision project. The notification requirements have been met; therefore, the conditions have not been included in this renewal permit.

Condition 6.2.38 of Amendment No. 2621-103-0007-V-05-4 was added to require construction and startup notifications for new converting lines and Flexographic Printer Nos. 7 and 8. The notifications have been completed and are not included in this permit.

Condition 6.2.39 of Amendment No. 2621-103-0007-V-05-5 was added to require startup notification for the Combustion Turbine No. 1 engine replacement. The notification has been completed and is not included in this permit.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

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. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not 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.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//q