

NOTICE OF THE OPPORTUNITY FOR PUBLIC COMMENT

GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION AIR PROTECTION BRANCH

STATE OF GEORGIA COUNTY OF CHATHAM

To All Interested Parties:

Willamette Industries, Inc. has filed an application to modify selected processes and emission units to comply with future standards of 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry ("Cluster Rule") and 40 CFR 63 Subpart MM – "National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills" at its existing papermaking facility in Port Wentworth, Georgia (Chatham County). Willamette has filed a Pollution Control Project (PCP) application with the Environmental Protection Division (EPD) for an air quality permit to construct, modify, and operate this process. State law specifies that a permit shall be issued upon a determination by the EPD Director that the emission source will comply with all State and Federal regulations and requirements.

You are hereby notified of the opportunity for written public comments concerning the application for a permit to modify selected processes and emission units to comply with future standards of 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry ("Cluster Rule") and 40 CFR 63 Subpart MM – "National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills" and the EPD's Evaluation concerning the application. The Evaluation is a summary of the technical review of the application and contains a copy of the Company's application along with supporting documents, and the draft Air Quality Permit.

EPD has concluded that Willamette Industries' application should be approved and that a permit should be granted. This conclusion is based upon evidence that the proposed project will comply with the Division's Rules and Regulations for Air Quality Control, Chapter 391-3-1; that the emissions from the source will not cause or add to a violation of any ambient air quality standard; and that emissions from the source will not cause any significant deterioration of air quality and will comply with the Federal Prevention of Significant Deterioration (PSD) regulations, 40 CFR 52.21, concerning PCPs.

Two proposed projects are being addressed by this Pollution Control Project. They include collection and routing of the High Volume Low Concentration Hazardous Air Pollutant (HAP) emissions to the recovery furnace for incineration and the replacement of the Lime Kiln Scrubber with an Electrostatic Precipitator (ESP).

The "HVLC Project" will realize an actual reduction of 69.90 tons per year (tpy) of HAP emissions from the entire Mill, an actual reduction of 130.15 tpy of VOC emissions from the entire Mill, an actual reduction of 24.77 tpy of TRS emissions from the entire Mill and a reduction in the odor impacts of the Mill due to lower TRS emissions. The collection and treatment of the HVLC gas streams will be in compliance with the requirements of 40 CFR 63.443(c).

In addition, there will be no increase in production from the facility as a result of the HVLC project and the capacity of the recovery boiler will remain unchanged. The HVLC project will not cause an increase in the utilization of any unit.

The collateral increases in emissions associated with the HVLC project, as a result of the incremental increase in material combusted in the boiler, will be very small (only 2.009 tpy of SO₂ and less than 1 tpy of each of PM, CO, NO_x and VOC). No changes in the permitted emission limits of the recovery boiler will be required.

The replacement of the scrubber focuses on ensuring that Willamette will meet the strict PM emission standards when burning fuel oil as required by MACT II. An additional effect of this modification is a reduction of "dusting events" attributed by the lime kiln. The existing lime kiln may have difficulty meeting the 0.064 grains per dry standard cubic feet (gr/dscf) at 10% oxygen unless the existing scrubber is replaced.

The new ESP will have a vendor-guarantee outlet grain loading rate of 0.01 gr/dscf. This value is equal to the MACT II standard for new lime kilns and significantly below the standard for existing lime kilns.

The "Lime Kiln Project" will realize an actual reduction of 46.42 tons per year (tpy) of PM emissions from the Lime Kiln, a reduction of 0.39 tpy of metallic HAP emissions from the Lime Kiln and a reduction or elimination of dusting events due to PM emissions from the Lime Kiln. There will be no increase in production from the facility as a result of the Lime Kiln project and the capacity of the kiln will remain unchanged. The Lime Kiln project will not cause an increase in the utilization of any unit.

When both projects are considered together, the impact on emissions is environmentally beneficial. The actual increase in SO₂, CO and NO_x emissions from both projects will be less than PSD significance levels. The decrease in actual PM, VOC, TRS and HAPS emission decreases are much larger than the collateral increases in SO₂, CO and NO_x.

The facility, as it will exist following the proposed modification, will not cause or contribute to a violation of the Modeling Significance Levels. Since these significance levels were not breached, no further modeling for NAAQS or PSD increments was needed.

The Evaluation is available for review for public review during normal business hours at the EPD Office, Air Protection Branch, 4244 International Parkway, Atlanta Tradeport - Suite 120, Atlanta, Georgia 30354 and the Chatham County Courthouse, Savannah, Georgia. Persons wishing to comment upon the Preliminary Determination are invited to submit their comments in writing to the EPD at the above Atlanta address, postmarked no later than 30 days after the date of publication in this newspaper. All comments postmarked on or prior to that date will be considered by the Division in making its final decision on the permit.

Any requests for a public hearing must be made within the 30-day public comment period. A request for a hearing should be in writing and specify, in as much detail as possible, the portion of the Georgia Rules for Air Quality Control or the Federal Rules that the individual making the request is concerned may not have been adequately reviewed. A public hearing may be held if the Director of the EPD finds that such a hearing would assist the EPD in a proper review of the proposed facility's capability to comply with the Federal and State air quality regulations.

After the comment period has expired, the EPD will issue a Final Determination relative to the facility's application. Copies of the Final Determination, comments received, and any other relevant information will then be made available for public review during normal business hours at the office of the Air Protection Branch.

For additional information, contact Mr. Jimmy Johnston, Program Manager, Stationary Source Permitting Program, at the Atlanta address, or by phone at 404/363-7000. Please refer to this notice when requesting information.