

Facility Name: **International Paper - Savannah**
 City: Savannah
 County: Chatham
 AIRS #: 04-13-051-00007

Application No.: TV-22889
 Date Application Received: October 10, 2014
 Permit No: 2631-051-0007-V-03-0

Program	Review Engineers	Review Managers
SSPP	Casie Britton	David Matos
ISMP	Bob Scott	Richard Taylor
SSCP	John Harrison	Sean Taylor
Toxics	Sherry Waldron	Michael Odom
Permitting Program Manager		Eric Cornwell

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 here in 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. 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to International Paper - Savannah 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

International Paper - Savannah

2. Parent/Holding Company Name

International Paper Company

3. Previous and/or Other Name(s)

Union Camp Corporation

4. Facility Location

1201 West Lathrop Avenue
Savannah, Georgia 31408 (Chatham County)

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

International Paper - Savannah is located in an attainment area.

B. Site Determination

The Part 70 Site consists solely of International Paper – Savannah (AIRS No. 051-00007). There are no other facilities which could possibly be contiguous or adjacent and under common control.

On March 1, 2007, Arizona Chemical Company, Savannah Plant (AIRS No. 051-00148) was sold to Rhone Capital III. Ownership of International Paper – Savannah (the pulp and paper facility) was retained by International Paper Company.

Prior to the March 1, 2007, transaction, International Paper – Savannah and the adjacent Arizona Chemical Company, Savannah Plant were both parts of the same Part 70 Site under the common control of International Paper Company although each facility operated under a separate Part 70 Operating Permit.

International Paper – Savannah (AIRS No. 051-00007) and Arizona Chemical Company, Savannah Plant (AIRS No. 051-00148) now operate as two autonomous Part 70 Sites.

This Part 70 Operating Permit will cover only International Paper – Savannah.

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
2631-051-0007-V-02-0	April 20, 2010	Title V Renewal Permit
Off-Permit Change	February 22, 2011	Off-Permit Change for the addition of a new vent point in the roof of the #8 Paper Machine (#8PM) building.
2631-051-0007-V-02-1	March 2, 2012	Minor Modification without Construction to update the periodic reporting deadlines.
Off-Permit Change	October 5, 2012	Off-Permit Change for modifications to the No. 8 Paper Machine Couch Double Doctor System and the K1 Digester System previously permitted under Title V Permit Amendment No. 2631-051-0007-V-01-7, which was incorporated into Title V Renewal Permit No. 2631-051-0007-V-02-0.
Off-Permit Change	November 30, 2012	Off-Permit Change for the replacement of the double-back glue unit associated with the corrugator in the Box Plant.
Off-Permit Change	February 3, 2014	Off-Permit Change for the replacement of the K1 Digester clove rotor pump.
Off-Permit Change	August 12, 2014	Off-Permit Change for a change in the method of weighing chips, from weightometer to chip meter, to calculate digester production as part of the compliance demonstration for 40 CFR 63.446.
2631-051-0007-V-02-2	October 27, 2014	PSD/Significant Modification without Construction for modification of the No. 13 Power Boiler for compliance with the Boiler MACT (40 CFR 63 Subpart DDDDD) and the Regional Haze (40 CFR 51.308) emission limits for HCl and SO ₂ .

D. Process Description

1. SIC Codes(s)

2631 – Paperboard Mills
 2611 – Pulp Mills
 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)

International Paper - Savannah produces unbleached Kraft linerboard, corrugating medium, and saturating Kraft paper.

3. Overall Facility Process Description

International Paper – Savannah has a rated production capacity of 1.2 million tons annually. The output of products ranges from the lightest weight unbleached paper to heavy-duty linerboard used in the manufacture of corrugated boxes. One machine is dedicated to the production of saturating kraft, the core stock for plastic laminates used in kitchen and bath cabinets and countertops.

The kraft (sulfate) process at International Paper – Savannah produces pulp from wood chips. Sulfate turpentine and wood fat soaps are by-products of this process. In addition, waste paper is converted to pulp, and the pulp is then converted to paper and linerboard on a series of paper machines. Linerboard produced by International Paper – Savannah is used to manufacture boxes in the corrugated box plant.

The initial step in the manufacturing process involves receipt of logs by truck. The logs are then washed, debarked, and chipped. The wood chips are conveyed to the pulp mill digesters. In the digesters, white liquor, a hot mixture of chemicals including sodium hydroxide and sodium sulfide, is used to cook the wood chips. The cooking dissolves the lignin, the material that binds the wood fibers, and forms a chemical solution called black liquor. The pulp/black liquor mixture is pumped to pulp washers where the spent black liquor is washed from the pulp. The dilute black liquor from the pulp washers is then pumped to the weak liquor tanks for storage, and the clean pulp is pumped to the paper mill where it is converted to paper and board products.

The black liquor contains a variety of dissolved organic materials from the wood that can be burned. Because the black liquor coming from the pulp washers has a high water content, it must be concentrated in the evaporators before it can be burned in the recovery furnace. Black liquor containing about 16 percent dissolved solids is pumped from the weak liquor tanks to the evaporators. The black liquor leaving the evaporators contains about 50 percent solids. The black liquor then flows to the cascade evaporators or the concentrator where the black liquor is concentrated and the solids content increases to between 60 and 85 percent prior to being sprayed into the recovery furnace.

The remainder of the water in the black liquor is evaporated inside the recovery furnace by the heat generated during burning. The dry black liquor falls to the bottom of the recovery furnace to form a char bed, a combination of molten sodium and sulfur compounds and burning organic compounds from the dissolved wood. The burning of the combustible organics forms gases that are further burned higher up in the recovery furnace. The smelt, the molten mixture of sodium and sulfur compounds, flows through spouts arranged in the bottom of the recovery furnace and is then dissolved in a smelt dissolving tank to form green liquor. The green liquor is then pumped to the caustic room where it is combined with lime to form a mixture of white liquor and lime mud, which is then separated in the white liquor clarifier. The lime mud is heated in the lime kiln to produce re-burned lime. Completing the chemical recovery process, the white liquor is then used in the digesters to convert wood chips to pulp.

Washed pulp from the pulping process is stored in large tanks before being used in the paper mill. Various grades of pulp made from both pine chips and hardwoods chips are stored. Different pulps may be combined in the blend chest of an individual paper machine. This pulp is then fed to the paper machine where it is dewatered and dried to form paper.

International Paper – Savannah produces various grades of kraft paper, linerboard, and saturating kraft on three operating machines. Some products are single-ply while others have a top sheet and a bottom sheet bound together for strength. Paper can be converted to corrugated boxes and laminates. The box plant manufactures, prints, and ships corrugated paperboard containers. The primary raw materials for the box plant include paperboard medium and linerboard, adhesive made with cornstarch and sodium hydroxide, flexographic printing inks, and a food-grade wax.

Although the tall oil collection facilities are located at International Paper – Savannah, the tall oil collection operations at the mill are conducted by Arizona Chemical. Tall oil recovered at International Paper – Savannah is transported by railcar to the adjacent Arizona Chemical plant.

No. 13 Power Boiler Bark Burning Project

The No. 13 Power Boiler Bark Burning Project includes the following modifications to improve the reliability of the boiler and associated systems when firing bark and, thus, to allow for an increase in the annual and hourly bark firing rates:

- Modifying bark bins to reduce pluggage;
- Upgrading the ash system, including replacing the primary and secondary collectors;
- Adding a magnet and metal detector in the bark lines;
- Reconfiguring the bark feeders to reduce housekeeping issues.

Boiler MACT/Regional Haze PSD Project

The purpose of the Boiler MACT/Regional Haze PSD Project is to modify the No. 13 Power Boiler for compliance with the Boiler MACT (40 CFR 63 Subpart DDDDD) and the Regional Haze Rule (40 CFR 51.308). The modifications include the following:

- The removal of the capability to fire fuel oil;
- The addition of load-bearing natural gas burners; and
- The optimization of combustion controls and the combustion air system.

Before the Boiler MACT/Regional Haze PSD Project, the No. 13 Power Boiler is permitted to burn biomass (bark), pulverized coal, and fuel oil in addition to non-condensable gases (NCGs) and condensate stripper off-gases (SOGs). After the Boiler MACT/Regional Haze PSD Project, the No. 13 Power Boiler will be permitted to burn biomass (bark), pulverized coal, and natural gas in addition to non-condensable gases (NCGs) and condensate stripper off-gases (SOGs).

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

International Paper – Savannah is subject to the requirements of 40 CFR 52.21, “Prevention of Significant Deterioration” (PSD). However, some limits have been taken to avoid PSD on certain previous modifications. They are as follows:

1. The Lime Conveyor System (OPG8) is limited to 7.9 pounds of PM emissions per hour and 34.6 tons of PM emissions during any twelve consecutive months.
2. The K2 Fine Cyclone (AP06) is limited to 5.71 pounds of PM emissions per hour.
3. The Poultry Line (PL) is limited to 10 tons of VOC emissions during any twelve consecutive months.
4. The No. 2 Poultry Line (PL2) is limited to 10 tons of VOC emissions during any twelve consecutive months.
5. The No. 15 Recovery Furnace (RF15) is limited to 319 pounds of SO₂ emissions per hour.
6. The White Liquor Scrubber (WLS1) must achieve a minimum removal efficiency for TRS compounds of 50 percent by weight. TRS gases from Emission Group LVH2 must be scrubbed in the White Liquor Scrubber prior to combusting at least 90 percent of the time that the gases are combusted in the No. 13 Power Boiler.
7. Facility-wide fiber production is limited to 1,222,750 air-dried tons of virgin pulp fiber per year.
8. The No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) is limited to 2.6 pounds of TRS emissions per hour.

2. Title V Major Source Status by Pollutant

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

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart S, "National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry," for the operation of the Kraft pulping process.

The facility is subject to 40 CFR 63 Subpart KK, "National Emission Standards for the Printing and Publishing Industry," for the operation of the Box Plant (BP).

The facility is subject 40 CFR 63 Subpart MM, "National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills," for the operation of the No. 7 Lime Kiln (LK07), the No. 15 Recovery Furnace (RF15), and the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10).

The facility is subject to 40 CFR 63 Subpart ZZZZ, "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of two ditch pumps, the lime kiln auxiliary drive, two emergency fire pumps, and one non-emergency fire pump, all of which are listed as insignificant activities.

The facility is subject to 40 CFR Subpart DDDDD, "National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters," for the operation of the No. 13 Power Boiler (PB13).

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	No
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

Facility-wide fiber production is limited to less than 1,222,750 air-dried tons of virgin pulp fiber per year, as based on a twelve-month rolling total. This production limit, which was requested by the facility, is equivalent to the facility-wide production of air-dried virgin pulp fiber used as the basis for calculating the potential emissions for the modification associated with previous Permit No. 2631-051-0007-V-01-7. This production limit was established for avoidance of 40 CFR 52.21.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

None applicable.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
2.1.1	2.1.1		

Condition No. 2.1.1 limits the facility-wide production to less than 1,222,750 air-dried tons of virgin pulp fiber per year, as based on a twelve-month rolling total. This condition was established for avoidance of 40 CFR 52.21.

III. Regulated Equipment Requirements

A. Brief Process Description

Please see the overall facility description as stated above in **I. Facility Description – D. Process Description – 3. Overall Facility Process Description.**

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
LK07	No. 7 Lime Kiln	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart S 40 CFR 63 Subpart MM 40 CFR Part 64 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.3.1, 3.3.15, 3.3.17, 3.3.31, 3.3.34, 3.4.1, 3.4.2, 3.4.3, 3.4.11, 3.4.12, 4.2.1, 4.2.2, 5.2.1, 5.2.3, 5.2.4, 5.2.10, 5.2.14, 5.2.15, 6.1.7, 6.2.1, 6.2.23, 6.2.24, 6.2.27, 6.2.29, 6.2.30, 6.2.40, 6.2.41, 6.2.42, 6.2.43, 7.14.2, 7.14.3	AP01	No. 7 Lime Kiln Electrostatic Precipitator
OPG8	Lime Conveyor System	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.2, 3.4.4, 3.4.5, 5.2.3, 5.2.14, 5.2.20, 6.1.7	AP03	No. 7 Lime Kiln Dust Scrubber
LK10	North Slaker	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.4, 3.4.5	AP04	North Slaker Wetted Fan Scrubber
LK11	South Slaker	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.4, 3.4.5	AP05	South Slaker Wetted Fan Scrubber
RF15	No. 15 Recovery Furnace	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart MM 40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.2, 3.3.3, 3.3.4, 3.3.5, 3.3.30, 3.3.31, 3.3.34, 3.4.6, 4.2.1, 4.2.2, 5.2.1, 5.2.3, 5.2.10, 5.2.14, 5.2.16, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.22, 6.2.40, 6.2.41, 6.2.42, 6.2.43	AP14	No. 15 Recovery Furnace Electrostatic Precipitator
RF10	No. 15 Recovery Furnace Smelt Dissolving Tank	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart MM 40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)	3.3.6, 3.3.31, 3.3.34, 3.4.7, 3.4.8, 3.4.9, 4.2.1, 4.2.2, 5.2.2, 5.2.11, 5.2.14, 5.2.18, 5.2.19, 6.1.7, 6.2.40, 6.2.41, 6.2.42, 6.2.43,	AP15	No. 15 Recovery Furnace Smelt Dissolving Tank Vent Scrubber

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PB13	No. 13 Power Boiler	40 CFR 51.308 40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart D 40 CFR 63 Subpart A 40 CFR 63 Subpart S 40 CFR 63 Subpart DDDDD 40 CFR Part 64 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.2, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.15, 3.3.16, 3.3.17, 3.3.29, 3.3.35, 3.4.10, 3.4.11, 4.2.1, 4.2.2, 4.2.9, 4.2.10, 4.2.11, 4.2.12, 4.2.13, 4.2.14, 5.2.1, 5.2.3, 5.2.5, 5.2.12, 5.2.13, 5.2.14, 5.2.17, 6.1.7, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19, 6.2.20, 6.2.21, 6.2.22, 6.2.23, 6.2.26, 6.2.28, 6.2.29, 6.2.30, 6.2.39, 7.14.1, 7.14.2, 7.14.3, 7.14.4	AP07	No. 13 Power Boiler Electrostatic Precipitator
AP06	K2 Fines Cyclone	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.14, 3.4.13, 3.4.14, 5.2.9, 6.1.7	---	---
LVH1	LVHC Pulping Vents (Nos. 1 and 2 Kamy Digester Systems, No. 1 Stripper Collection Tank, Nos. 4 through 7 Evaporator Systems, Foul Condensate Collection Tank, Turpentine System)	40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart S 391-3-1-.02(2)(gg)	3.3.9, 3.3.15, 3.3.17, 3.3.31, 3.3.32, 4.2.7, 5.2.2, 5.2.7, 6.1.7, 6.2.29, 6.2.30, 6.2.32, 6.2.34, 6.2.35	PB13 LK07	No. 13 Power Boiler No. 7 Lime Kiln
LVH2	LVHC Pulping Vents: Pre-Evaporator Island (Pre-Evaporator System, No. 2 Stripper Feed Tank)	40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart S 391-3-1-.02(2)(gg)	3.2.1, 3.3.9, 3.3.15, 3.3.17, 3.3.31, 3.3.32, 4.2.7, 5.2.2, 5.2.7, 6.1.7, 6.2.29, 6.2.30, 6.2.32, 6.2.34, 6.2.35, 6.2.39	PB13 LK07 WLS1	No. 13 Power Boiler No. 7 Lime Kiln White Liquor NCG Scrubber
HVLC	HVLC Pulping Vents (Nos. 1 and 2 Kamy Washer Systems)	40 CFR 63 Subpart A 40 CFR 63 Subpart S	3.3.9, 3.3.16, 3.3.17, 3.3.32, 4.2.7, 5.2.2, 5.2.7, 6.1.7, 6.2.29, 6.2.30, 6.2.32, 6.2.34, 6.2.35	PB13	No. 13 Power Boiler
PPCC	Pulping Process Condensate Collection System	40 CFR 63 Subpart A 40 CFR 63 Subpart S	3.3.18, 3.3.19, 3.3.20, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.32, 4.2.4, 4.2.5, 4.2.6, 5.2.2, 5.2.6, 5.2.8, 6.1.7, 6.2.31, 6.2.33, 6.2.34, 6.2.35, 6.2.37, 6.2.38	AP17 AP18	Steam Stripper Biological Treatment System
BP	Box Plant	40 CFR 63 Subpart A 40 CFR 63 Subpart KK	3.3.28, 3.3.33, 3.4.15, 6.1.7, 6.2.48, 6.2.49, 6.2.50, 6.2.51	---	---
PL	Poultry Line	---	3.3.26, 6.1.7, 6.2.45, 6.2.46, 6.2.47	---	---
PL2	No. 2 Poultry Line	---	3.3.27, 6.1.7, 6.2.45, 6.2.46, 6.2.47	---	---

C. Equipment & Rule Applicability

Emission and Operating Caps

The White Liquor Scrubber (WLS1) is used to remove TRS compounds from the LVHC streams of Emission Group LVH2 prior to combustion in the No. 13 Power Boiler (PB13). To offset an increase in SO₂ emissions resulting from modifications performed for MACT I, Phase 2 compliance, the White Liquor Scrubber must achieve a TRS removal efficiency of no less than 50 percent. This requirement was established for avoidance of 40 CFR 52.21.

The sale of electrical output to any utility power distribution system from the No. 15 Recovery Furnace (RF15) or the No. 13 Power Boiler (PB13) is limited to less than one-third of its potential output capacity or to less than 25 MW, whichever is less, during any twelve consecutive months. This limit was established for avoidance of both 40 CFR 60 Subpart Da and 40 CFR 72 Subpart A.

Rules and Regulations Assessment

The No. 7 Lime Kiln (LK07) was constructed in 1990 and is equipped with an electrostatic precipitator (AP01) to control PM emissions. The No. 7 Lime Kiln, which has a heat input capacity of 147 MMBtu/hr, is permitted to burn natural gas, No. 6 fuel oil, and tall oil pitch. The applicable rules and regulations are summarized below:

- 40 CFR 52.21 – Prevention of Significant Deterioration: The PSD SO₂ limit was established as part of the No. 15 Recovery Furnace PSD Project.
- 40 CFR Subpart S – National Emission Standards for Hazardous Air Pollutants: Subpart S applies to all pulp mills at major sources for HAP. Subpart S requires the facility to control emission vents from the listed equipment by introducing the gases with the primary fuel or into the flame zone of a combustion device. The kiln is the backup combustion device for LVH1 and LVH2 gases. The No. 13 Power Boiler is the primary combustion device.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills: The kiln was constructed before March 13, 2001; therefore, it is considered an existing source under Subpart MM. The kiln is subject to the PM limits of Subpart MM, which subsumes the PM limit in 40 CFR 60 Subpart BB.
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The kiln was constructed after September 24, 1976; therefore, it is subject to the TRS and PM limits of Subpart BB. The PM limit is subsumed by the more stringent PM limit in 40 CFR 63 Subpart MM. The TRS limit subsumes the TRS limit in Georgia Rule (gg).
- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.
- Georgia Rule 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 kiln is considered a new source under Rule (e).
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits the fuel sulfur content for sources with heat input capacities greater than 100 MMBtu/hr to 3.0 percent by weight.

- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The kiln is subject to Rule (gg) because the mill was constructed before September 24, 1976. The kiln is subject to the TRS limits of Rule (gg). This limit is subsumed by the more stringent TRS limit in 40 CFR 60 Subpart BB.
- 40 CFR Part 64 – Compliance Assurance Monitoring: The lime kiln is subject to CAM for PM emissions. Although the lime kiln is subject to a MACT PM limit, the PM limit under Georgia Rule (e) is more stringent. Therefore, CAM is still applicable.

The Lime Conveyor System (OPG8) was constructed in 1990 and is equipped with a dust scrubber (AP03) to control PM emissions. The conveyor system has a maximum lime input of 55.8 lb/hr. The applicable rules and regulations are summarized below:

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.
- Georgia Rule 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 conveyor system is considered a new source under Rule (e).
- 40 CFR Part 64 – Compliance Assurance Monitoring: The conveyor system is subject to CAM for PM emissions. Because it is considered to be a small PSEU under CAM, the facility is only required to monitor and record the scrubbant flow rate of the scrubber once per eight-hour shift.

The North Slaker (LK10) and the South Slaker (LK11) were constructed in 1990, and each slaker is equipped with dedicated a wetted fan scrubber (AP04 and AP05) to control PM emissions. The applicable rules and regulations are summarized below:

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

The No. 15 Recovery Furnace (RF15) was constructed in 1995 and is equipped with an electrostatic precipitator (AP14). The No. 15 Recovery Furnace, which has a heat input capacity of 1950 MMBtu/hr, is permitted to burn natural gas and black liquor. The applicable rules and regulations are summarized below.

- 40 CFR 52.21 – Prevention of Significant Deterioration: The PSD NO_x limit was established as part of the No. 15 Recovery Furnace PSD Project.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills: The recovery furnace was constructed before March 13, 2001; therefore, it is considered an existing source under Subpart MM. The recovery furnace is subject to the PM limits of Subpart MM, which is equivalent to the PM limit in 40 CFR 60 Subpart BB.

- 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: The recovery furnace is subject to Subpart Db because it was constructed after June 19, 1984. The recovery furnace is subject to the opacity limit of Subpart Db. The SO₂ and NO_x limits have been avoided by limiting the fuel oil to “very low sulfur oil” and the annual capacity factor for fuel oil and natural gas fired. The opacity limit subsumes the opacity limit in 40 CFR 60 Subpart BB and Georgia Rule (b). The requirement to fire only “very low sulfur oil” subsumes the fuel sulfur content limit in Georgia Rule (g).
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The recovery furnace was constructed after September 24, 1976; therefore, it is subject to the TRS, PM, and opacity limits of Subpart BB. The PM limit is equivalent to the PM limit in 40 CFR 63 Subpart MM. The TRS limit is equivalent to the TRS limit in Georgia Rule (gg). The opacity limit is subsumed by the more stringent opacity limit in 40 CFR 60 Subpart Db.
- Georgia Rule 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 opacity limit is subsumed by the more stringent opacity limit in 40 CFR 60 Subpart Db.
- Georgia Rule 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 recovery furnace is considered a new source under Rule (e).
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The recovery furnace is subject to the fuel sulfur content limit of Rule (g). The fuel sulfur content limit is subsumed by the requirement to fire only “very low sulfur oil” under 40 CFR 60 Subpart Db.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The recovery furnace is subject to Rule (gg) because the mill was constructed before September 24, 1976, and is considered a new recovery furnace. The recovery furnace is subject to the TRS limit of Rule (gg), which is equivalent to the TRS limit in 40 CFR 60 Subpart BB.
- 40 CFR Part 64 – Compliance Assurance Monitoring: The recovery furnace is subject to CAM for PM emissions. Although the recovery furnace is subject to a MACT PM limit, the PM limit under Georgia Rule (e) is more stringent. Therefore, CAM is still applicable.

The No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) was constructed in 1995 and is equipped with a vent scrubber (AP15). The applicable rules and regulations are summarized below.

- 40 CFR 52.21 – Prevention of Significant Deterioration: The PSD PM and SO₂ limits were established as part of the No. 15 Recovery Furnace PSD Project. The PM limit expressed in terms of pounds per ton of black liquor solids subsumes the PM limits of 40 CFR 63 Subpart MM and 40 CFR 60 Subpart BB.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills: The smelt dissolving tank was constructed before March 13, 2001; therefore, it is considered an existing source under Subpart MM. The smelt dissolving tank is subject to the PM limits of Subpart MM, which is subsumed by the more stringent PM PSD limit.
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The smelt dissolving tank was constructed after September 24, 1976; therefore, it is subject to the TRS and PM limits of Subpart BB. The PM limit is subsumed by the more stringent PM PSD limit. The TRS limit is subsumed by the more stringent TRS limit in Georgia Rule (gg).

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.
- Georgia Rule 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 smelt dissolving tank is considered a new source under Rule (e).
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The smelt dissolving tank is subject to Rule (gg) because the mill was constructed before September 24, 1976. The smelt dissolving tank is subject to the TRS limits of Rule (gg). This limit subsumes TRS limit in 40 CFR 60 Subpart BB.
- 40 CFR Part 64 – Compliance Assurance Monitoring: The smelt dissolving tank is subject to CAM for PM emissions. Although the smelt dissolving tank is subject to a MACT PM limit, the PM limit under Georgia Rule (e) is more stringent. Therefore, CAM is still applicable.

The No. 13 Power Boiler (PB13), which has a heat input capacity of 1280 MMBtu/hr, was constructed in 1981 and is equipped with an electrostatic precipitator (PB3B). The boiler is currently permitted to burn biomass (bark), pulverized coal, No. 6 fuel oil, and used oil in addition to non-condensable gases (NCGs) and condensate stripper off-gases (SOGs). After the Boiler MACT/Regional Haze PSD Project, the boiler will be permitted to burn biomass (bark), pulverized coal, and natural gas in addition to non-condensable gases (NCGs) and condensate stripper off-gases (SOGs). The applicable rules and regulations are summarized below.

- 40 CFR 51.308 – Regional Haze Rule: The Regional Haze Rule requires states to demonstrate reasonable progress toward meeting the goal of a return to natural visibility conditions in the nation's Class I areas. The SO₂ limit is equivalent to the reasonable controls that will support reasonable progress toward Georgia's regional haze goals and is an integral part of Georgia's Regional Haze SIP.
- 40 CFR 52.21 – Prevention of Significant Deterioration: The PM was established as PSD limits. The SO₂ limits were established as part of the No. 15 Recovery Furnace PSD Project. The CO limit was established as part of the Boiler MACT/Regional Haze PSD Project and will not become effective until after the completion of the Boiler MACT/Regional Haze PSD Project. The PM limit subsumes the PM limits of 40 CFR 60 Subpart D and Georgia Rule (d). The CO limit subsumes the CO limit of 40 CFR 63 Subpart DDDDD.
- 40 CFR Subpart S – National Emission Standards for Hazardous Air Pollutants: Subpart S applies to all pulp mills at major sources for HAP. Subpart S requires the facility to control the Subpart S subject LVHC and HVLC NCG emission vents from the listed equipment (LVH1, LVH2, and HVLC) by introducing the gases with the primary fuel or into the flame zone of a combustion device. The boiler is the primary combustion devices for LVHC and HVLC gases. The No. 7 Lime Kiln is the backup combustion device for the LVHC gases.
- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: The boiler was constructed before June 4, 2010; therefore, it is considered an existing source under Subpart DDDDD. The boiler is classified as a hybrid suspension grate unit designed to burn biomass/bio-based solid and has a compliance date of January 31, 2017. The boiler will be subject to the HCl, Hg, CO, and filterable PM emission limits and will be required to conduct annual tune-ups and a one-time energy assessment. The CO limit is subsumed by the more stringent CO PSD limit.

- 40 CFR 60 Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators: The boiler is subject to Subpart D because it was constructed after August 17, 1971. The boiler is subject to the PM, SO₂, NO_x, and opacity limits of Subpart D. The PM limit is subsumed by the more stringent PM PSD limit. The SO₂ limits are equivalent to the SO₂ limits in Georgia Rule (gg). The NO_x limits are equivalent to the NO_x limits in Georgia Rule (d). The opacity limit is equivalent to the opacity limit in Georgia Rule (d). After completion of the Boiler MACT/Regional Haze PSD Project, the SO₂ and NO_x limits will change to reflect the change in fuels burned – from the limits for firing coal and oil to the limits for firing coal and gas.
- 40 CFR 63 Subpart BB – Standards of Performance for Kraft Pulp Mills: Subpart BB requires the facility to control TRS emissions from the Subpart BB subject LVHC NCG System (LVH1 and LVH2) unless the emissions are burned in a combustion device at a minimum temperature of 1200°F for at least 0.5 seconds. The facility has chosen to comply with this requirement by introducing the TRS gases from LVH1 and LVH2 into the flame zone of the boiler.
- Georgia Rule 391-3-1-.02(2)(d) – Fuel-burning Equipment: The boiler was constructed after January 1, 1972; therefore, it is considered a new source under Rule (d). Rule (d) limits the PM and NO_x emissions from a source based on heat input capacity and limits the opacity from new sources. The boiler is subject to the PM and opacity limits of Rule (d). The PM limit is subsumed by the more stringent PM PSD limit. The NO_x limits are equivalent to the NO_x limits in 40 CFR 60 Subpart D. The opacity limit is equivalent to the opacity limit in 40 CFR 60 Subpart D. After completion of the Boiler MACT/Regional Haze PSD Project, the NO_x limits will change to reflect the change in fuels burned – from the limits for firing coal and oil to the limits for firing coal and gas.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: Rule (g) limits the SO₂ emissions from a source based on the types of fuel fired and limits the fuel sulfur content for sources with heat input capacities greater than 100 MMBtu/hr to 3.0 percent by weight. The boiler is subject to the SO₂ limits and the fuel sulfur content limit of Rule (g). The SO₂ limits are equivalent to the SO₂ limits in 40 CFR 60 Subpart D. After completion of the Boiler MACT/Regional Haze PSD Project, the SO₂ limits will change to reflect the change in fuels burned – from the limits for firing coal and oil to the limits for firing coal and gas.
- 40 CFR Part 64 – Compliance Assurance Monitoring: The boiler is subject to CAM for PM emissions. Although the boiler is subject to a MACT PM limit, the PM PSD limit is more stringent. Therefore, CAM is still applicable.

The K2 Fines Cyclone (AP06) was constructed in 1995. The applicable rules and regulations are summarized below:

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: Rule (b) limits the opacity of emissions from air contaminant sources to less than 40 percent.
- Georgia Rule 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 cyclone is considered a new source under Rule (e).

Emissions Group LVH1 is the LVHC Pulping Vents, which includes the Nos. 1 and 2 Kamyr Digester Systems, the No. 1 Stripper Collection Tank, the Nos. 4 through 7 Evaporator Systems, the Foul Condensate Collection Tank, and the Turpentine System. Emission Group LVH2 is the LVHC Pulping Vents: Pre-Evaporator Island, which includes the Pre-Evaporator System and the No. 2 Stripper Feed Tank. The LVH1 equipment was constructed at various times from the 1960s to the 2000s; the LVH2 equipment was constructed in 1995. The LVH1 and LVH2 gases are controlled by the No. 13 Power Boiler (primary device) or the No. 7 Lime Kiln (backup device). The TRS gases from LVH2 are scrubbed in the White Liquor NCG Scrubber (WLS1) prior to combustion to reduce SO₂ emissions. The applicable rules and regulations are summarized below.

- 40 CFR 63 Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: Subpart S applies to all pulp mills at major sources for HAP. The equipment constructed before December 17, 1993, is considered existing equipment under Subpart S, and the equipment constructed after December 17, 1993, is considered new equipment. Subpart S requires the facility to control emission vents from the listed equipment by introducing the gases with the primary fuel or into the flame zone of a combustion device. The No. 13 Power Boiler is the primary combustion device for LVH1 and LVH2 gases; the No. 7 Lime Kiln is the backup combustion device.
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The LVH1 and LVH2 equipment that was constructed after September 24, 1976, is subject to Subpart BB. TRS emissions are limited to 5 ppm by volume on a dry basis (corrected to 10 percent oxygen) unless the emissions are burned in a combustion device at a minimum temperature of 1200°F for at least 0.5 seconds. The facility has chosen to comply with this requirement by introducing the TRS gases from LVH1 and LVH2 into the flame zone of the No. 13 Power Boiler (primary device) or the No. 7 Lime Kiln (backup device).
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The LVH1 and LVH2 equipment is subject to Rule (gg) because the mill was constructed before September 24, 1976. The LVH1 and LVH2 equipment is subject to the TRS limits of Rule (gg). TRS emissions are limited to 5 ppm by volume on a dry basis (corrected to 10 percent oxygen) unless the emissions are burned in a combustion device at a minimum temperature of 1200°F for at least 0.5 seconds. The facility has chosen to comply with this requirement by introducing the TRS gases from LVH1 and LVH2 into the flame zone of the No. 13 Power Boiler.

Emissions Group HVLC is the HVLC Pulping Vents, which includes the Nos. 1 and 2 Kamyr Washer Systems. The HVLC equipment was constructed at various times from the 1960s to the 1980s. The HVLC gases are controlled by the No. 13 Power Boiler. The applicable rules and regulations are summarized below.

- 40 CFR 63 Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: Subpart S applies to all pulp mills at major sources for HAP. The HVLC equipment was constructed before December 17, 1993; therefore, it is considered an existing source under Subpart S. Subpart S requires the facility to control emission vents from the listed equipment by introducing the gases with the primary fuel or into the flame zone of a combustion device. The No. 13 Power Boiler is the combustion device for HVLC gases.

The Pulping Process Condensate Collection System (PPCC) includes each Kamyr digester and washer system, each evaporator system, and the LVHC collection system. The PPCC condensates are collected and treated in the Steam Stripper (AP17) as the primary control device and the Biological Treatment System (AP18) as the backup control device. The applicable rules and regulations are summarized below.

- 40 CFR 63 Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: Subpart S applies to all pulp mills at major sources for HAP. The equipment constructed before December 17, 1993, is considered existing equipment under Subpart S, and the equipment constructed after December 17, 1993, is considered new equipment. Subpart S requires the facility to collect and treat the condensates from the PPCC equipment. The facility must collect 7.2 pounds of HAP per ton of oven-dried pulp. The treatment of the condensates must remove 6.6 pounds of HAP per ton of oven-dried pulp.

The Box Plant (BP) includes the corrugator, three flexo/folder/glueers, a die cutter, and a curtain coater. The applicable rules and regulations are summarized below.

- 40 CFR 63 Subpart KK – National Emission Standards for the Printing and Publishing Industry: Subpart KK applies to publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses at major sources of HAP. The facility has opted to limit organic HAP applied on the subject equipment to 400 kg/month. Therefore, under §63.821(b)(2), the facility is only required to maintain records of the total mass and organic HAP content of each material applied on the subject equipment during each month.

D. Compliance Status

None applicable.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Equipment Emission Caps and Operating Limits

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
3.2.1	3.2.1		
3.2.2	3.2.2		

Condition No. 3.2.1 requires the facility to operate the White Liquor Scrubber (WLS1) so as to achieve a minimum TRS removal efficiency of 50 percent by weight. This condition was established as part of an SO₂ netting analysis for avoidance of 40 CFR 52.21.

Condition No. 3.2.2 limits the electrical output supplied to any utility power distribution system for sale from the No. 15 Recovery Furnace (RF15) or the No. 13 Power Boiler (PB13) to less than one-third of its potential electric output capacity or 25 MW, whichever is less. This condition was established for avoidance of both 40 CFR 60 Subpart Da and 40 CFR 72 Subpart A. This condition was modified in this Title V Renewal Permit to update the limit to mirror the language of the regulations.

Equipment Federal Rule Standards

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal				
3.3.1	a.	3.3.1	a.						
	b.		b.						
	c.		c.						
3.3.2	a.	3.3.2	a.						
	b.		b.						
3.3.3	a.	3.3.3	a.						
	b.		b.						
	c.		c.						
	d.		d.						
	e.		e.						
3.3.4		3.3.4							
3.3.5		3.3.5		Modified	R				
3.3.6	a.	3.3.6	i.						
			ii.						
	b.		b.						
c.	c.								
3.3.7	a.	3.3.7	i.						
			ii.						
			b.			iii.			
						iv.			
						v.			
	c.		i.						
			ii.						
			iii.						
	3.3.8		3.3.8						
	3.3.9		3.3.31						
	3.3.10		a.			3.3.36	a.	Added	2
b.		b.							
c.		c.							
3.3.11		3.3.37		Added	2				
3.3.12		3.3.34		Added	2				

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal				
3.3.13	a.	3.3.38	a.	Added	2				
						b.	b.		
								c.	c.
	i.		i.						
	ii.		ii.						
	iii.		iii.						
	ii.		ii.						
	iii.		iii.						
	iv.		iv.						
	3.3.14		3.3.9						
	3.3.15		a.			3.3.10	a.		
			b.				b.		
3.3.16		3.3.11							
3.3.17		3.3.12							
3.3.18	a.	3.3.13	a.						
						b.	b.		
	c.		c.						
						i.	i.		
	ii.		ii.						
	d.		d.						
e.	e.								
3.3.19		3.3.14							
3.3.20		3.3.15							
3.3.21	a.	3.3.16	a.						
	b.		b.						
3.3.22		3.3.17							
3.3.23		3.3.18							
3.3.24		3.3.19							
3.3.25	a.			Added	R				
						i.	A.		
							B.		
							C.		
							D.		
						ii.			
						iii.			
						iv.			
						v.			
						vi.			
vii.									
viii.									
ix.									
3.3.26		3.3.20							
3.3.27		3.3.21							
3.3.28		3.3.22							

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
3.3.29	3.3.24	Modified	R
3.3.30	3.3.25	Modified	R
3.3.31	3.3.26	Modified	R
3.3.32	3.3.28	Modified	R
3.3.33	3.3.29	Modified	R
3.3.34	3.3.30	Modified	R
3.3.35	3.3.35	Added	2
	3.3.23	Deleted	R
	3.3.27	Deleted	R
	3.3.32	Deleted	R
	3.3.33	Deleted	R

Condition No. 3.3.1 specifies the PM, TRS, and SO₂ limits for the No. 7 Lime Kiln (LK07).

- Paragraph a. specifies the PM limit under 40 CFR 63 Subpart MM, which subsumes the requirement under 40 CFR 60 Subpart BB.
- Paragraph b. specifies the TRS limit under 40 CFR 60 Subpart BB, which subsumes the requirement under Georgia Rule 391-3-1-.02(2)(gg).
- Paragraph c. specifies the SO₂ PSD limit that was established as part of the No. 15 Recovery Furnace PSD Project.

Condition No. 3.3.2 specifies the PM limits for the Lime Conveyor System (OPG8), which were established for avoidance of 40 CFR 52.21.

- Paragraph a. specifies the hourly PM limit.
- Paragraph b. specifies the annual PM limit.

Condition No. 3.3.3 specifies the opacity, NO_x, TRS, SO₂ and PM limits for the No. 15 Recovery Furnace (RF15).

- Paragraph a. specifies the opacity limit under 40 CFR 63 Subpart Db, which subsumes the requirements under 40 CFR 60 Subpart BB and Georgia Rule 391-3-1-.02(2)(gg).
- Paragraph b. specifies the NO_x PSD limit that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraph c. specifies the TRS limit under 40 CFR 60 Subpart BB and Georgia Rule 391-3-1-.02(2)(gg).
- Paragraph d. specifies the SO₂ limit that was established for avoidance of 40 CFR 52.21.
- Paragraph e. specifies the PM limit under 40 CFR 63 Subpart MM and 40 CFR 60 Subpart BB.

Condition No. 3.3.4 requires the facility to fire only fuel oil that meets the definition of “very low sulfur oil,” as defined in 40 CFR 60.41b, in the No. 15 Recovery Furnace (RF15). This condition was established to meet the SO₂ requirements of 40 CFR 60 Subpart Db, which subsumes the fuel sulfur content requirements of Georgia Rule 391-3-1-.02(2)(g).

Condition No. 3.3.5 specifies the annual capacity factor for fuel oil and natural gas fired in the No. 15 Recovery Furnace (RF15). This condition was established for avoidance of the NO_x requirements of 40 CFR 60 Subpart Db. This condition was modified in this Title V Renewal Permit to correct the citation.

Condition No. 3.3.6 specifies the PM, SO₂ and TRS limits for the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10).

- Paragraph a.i. specifies the hourly PM PSD limit that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraph a.ii. specifies the PM PSD limit in pounds per ton of black liquor solids (lb/ton BLS) that was established as part of the No. 15 Recovery Furnace PSD Project. This PSD limit also subsumes the PM requirements of 40 CFR 63 Subpart MM and 40 CFR 60 Subpart BB.
- Paragraph b. specifies the SO₂ PSD limit that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraph c. specifies the TRS limit that was established for avoidance of 40 CFR 52.21.

Condition No. 3.3.7 specifies the PM, SO₂, and NO_x limits for the No. 13 Power Boiler (PB13). After the completion of the Boiler MACT/Regional Haze PSD Project, this condition will become null and void and will be replaced by Condition No. 3.3.13.

- Paragraph a. specifies the PM PSD limit, which subsumes the PM requirements of 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).
- Paragraphs b.i. through b.iii. specify the SO₂ limits when firing liquid fossil fuel or liquid fossil fuel and wood residue, solid fossil fuel or solid fossil fuel and wood residue, and different fossil fuels simultaneously under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(g).
- Paragraph b.iv specifies the hourly SO₂ limit during any 24-hour period that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraph b.v. specifies the hourly SO₂ limit during any three-hour period that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraphs c.i. through c.iii. specify the NO_x limits when firing liquid fossil fuel or liquid fossil fuel and wood residue, solid fossil fuel or solid fossil fuel and wood residue, and different fossil fuels simultaneously under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).

Condition No. 3.3.8 specifies the opacity limit for the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).

Condition No. 3.3.9 specifies the SO₂ limit under the Regional Haze Rule (40 CFR 51.308) for emissions from the No. 13 Power Boiler (PB13) and from the LVHC and HVLC non-condensable gases and stripper off-gases (excluding the combustion of any of these gases in the No. 7 Lime Kiln (LK07)).

Condition No. 3.3.10 specifies the HCl, Hg, and PM limits for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 3.3.11 specifies the startup and shutdown provisions for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 3.3.12 specifies the PSD BACT limit for CO for the No. 13 Power Boiler (PB13). This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 3.3.13 specifies the PM, SO₂, and NO_x limits for the No. 13 Power Boiler (PB13) that have been updated to reflect the appropriate limits for the fuels to be fired after completion of the Boiler MACT/Regional Haze PSD Project. After completion of the Boiler MACT/Regional Haze PSD Project, this condition will replace Condition No 3.3.7. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

- Paragraph a. specifies the PM PSD limit, which subsumes the PM requirements of 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).
- Paragraph b.i. specifies the SO₂ limit when firing solid fossil fuel or solid fossil fuel and wood residue under 40 CFR 60 Subpart D.
- Paragraph b.ii specifies the hourly SO₂ limit during any 24-hour period that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraph b.iii. specifies the hourly SO₂ limit during any three-hour period that was established as part of the No. 15 Recovery Furnace PSD Project.
- Paragraphs c.i. through c.iv. specify the NO_x limits when firing gaseous fossil fuel, gaseous fossil fuel and wood residue, solid fossil fuel or solid fossil fuel and wood residue, and different fossil fuels simultaneously under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).

Condition No. 3.3.14 specifies the PM limit for the K2 Fines Cyclone (AP06) that was established for avoidance of 40 CFR 52.21.

Condition No. 3.3.15 specifies the manner in which NCG System gases are to be controlled.

- Paragraph a. specifies the manner for controlling HAP and TRS gases from Emission Groups LVH1 and LVH2 as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S and as a requirement of both 40 CFR 60 Subpart BB and Georgia Rule 391-3-1-.02(2)(gg).
- Paragraph b. specifies the manner for scrubbing and controlling the TRS gases from Emission Group LVH2 that was established for avoidance of 40 CFR 52.21.

Condition No. 3.3.16 specifies the manner for controlling HAP gases from Emission Group HVLC as a MACT I, Phase 2 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.17 specifies the closed-vent requirements for equipment listed in Condition Nos. 3.3.15 and 3.3.16 as a MACT I, Phase 2 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.18 specifies the Pulping Process Condensates (PPCC) that must be collected to meet the requirements of Condition Nos. 3.3.19 and 3.3.22. This condition is a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.19 specifies the total HAP mass of the Pulping Process Condensates (PPCC) that must be collected from the equipment systems listed in Condition No. 3.3.18 as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.20 specifies that the Pulping Process Condensates (PPCC) collected to meet the requirements of Condition No. 3.3.19 be conveyed in a closed collection system that meets the specified requirements. This condition is a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.21 specifies the requirements for the condensate collection tank as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.22 specifies the treatment removal requirements for the Pulping Process Condensates (PPCC) as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.23 specifies that compliance with the MACT I, Phase 1 requirements of 40 CFR 63 Subpart S is determined using the sum of total HAP removed from the Pulping Process Condensates (PPCC) by the Steam Stripper (AP17) and the Biological Treatment System (AP18).

Condition No. 3.3.24 specifies the requirements for discharging the Pulping Process Condensates (PPCC) into the Biological Treatment System (AP18) as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.25 specifies the requirements for asserting an affirmative defense in response to an action to enforce the standards of 40 CFR 63 Subpart S. This condition was added in the Title V Renewal Permit to include the new requirement of 40 CFR 63 Subpart S.

Condition No. 3.3.26 specifies the VOC limit for the Poultry Line (PL) that was established for avoidance of 40 CFR 52.21.

Condition No. 3.3.27 specifies the VOC limit for the No. 2 Poultry Line (PL2) that was established for avoidance of 40 CFR 52.21.

Condition No. 3.3.28 specifies the HAP limit for organic HAP applied on product and packaging rotogravure or wide-web flexographic printing presses in the Box Plant (BP). This condition is a requirement of 40 CFR 63 Subpart KK.

Condition No. 3.3.29 is the general applicability condition for 40 CFR 60 Subparts A and Db for the No. 13 Power Boiler (PB13). This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 60 Subpart A into the individual NSPS general applicability condition.

Condition No. 3.3.30 is the general applicability condition for 40 CFR 60 Subparts A and Db for the No. 15 Recovery Furnace (RF15). This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 60 Subpart A into the individual NSPS general applicability condition.

Condition No. 3.3.31 is the general applicability condition for 40 CFR 60 Subparts A and BB for the No. 7 Lime Kiln (LK07), the No. 15 Recovery Furnace (RF15), the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10), and Emission Groups LVH1 and LVH2. This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 60 Subpart A into the individual NSPS general applicability condition.

Condition No. 3.3.32 is the general applicability condition for 40 CFR 63 Subparts A and S for the operation of the pulp mill. Language was included in this condition to make the shutdown of the No. 8 Washline, including the Batch Digesters, and the resulting emissions credits federally enforceable for avoidance of 40 CFR 52.21. This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 63 Subpart A into the individual MACT general applicability condition.

Condition No. 3.3.33 is the general applicability condition for 40 CFR 63 Subparts A and KK for the Box Plant (BP), including the Flexo/Folder/Gluers, Corrugators, and any other stand-alone equipment included in accordance with 40 CFR 63.821(a)(2)&(3). This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 63 Subpart A into the individual MACT general applicability condition.

Condition No. 3.3.34 is the general applicability condition for 40 CFR 63 Subparts A and MM for the No. 7 Lime Kiln (LK07), the No. 15 Recovery Furnace (RF15), and the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10). This condition was modified in this Title V Renewal Permit to incorporate 40 CFR 63 Subpart A into the individual MACT general applicability condition.

Condition No. 3.3.35 is the general applicability condition for 40 CFR 63 Subparts A and DDDDD for the No. 13 Power Boiler (PB13). This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Deleted Conditions

Deleted Condition No. 3.3.23 was the general applicability condition for 40 CFR 60 Subpart A. This condition was deleted in this Title V Renewal Permit as 40 CFR 60 Subpart A was incorporated into each individual NSPS general applicability condition.

Deleted Condition No. 3.3.27 was the general applicability condition for 40 CFR 63 Subpart A. This condition was deleted in this Title V Renewal Permit as 40 CFR 63 Subpart A was incorporated into each individual MACT general applicability condition.

Deleted Condition No. 3.3.32 required the facility to submit a plan, including all required permit applications, for complying with the Regional Haze emission limit by June 2, 2014. The requirement of this condition was met with the submittal of the Boiler MACT/Regional Haze PSD Project application on June 2, 2014.

Deleted Condition No 3.3.33 required the facility to submit a proposal to satisfy periodic monitoring requirements or a CAM Plan to ensure compliance with the Regional Haze emission limit by June 2, 2014. The requirement of this condition was met with the submittal of the Boiler MACT/Regional Haze PSD Project application on June 2, 2014.

Equipment SIP Rule Standards

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
3.4.1	3.4.1		
3.4.2	3.4.2		

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
3.4.3	3.4.3		
3.4.4	3.4.4		
3.4.5	3.4.5		
3.4.6	3.4.6		
3.4.7	3.4.7		
3.4.8	3.4.8		
3.4.9	3.4.9		
3.4.10	3.4.10		
3.4.11	3.4.11		
3.4.12	3.4.15	Added	R
3.4.13	3.4.12		
3.4.14	3.4.13		
3.4.15	3.4.14		

Condition No. 3.4.1 specifies the opacity limit for the No. 7 Lime Kiln (LK07) under Georgia Rule 391-3-1-.02(2)(b).

Condition No. 3.4.2 specifies the PM limit for the No. 7 Lime Kiln (LK07) under Georgia Rule 391-3-1-.02(2)(e).

Condition No. 3.4.3 specifies the fuel sulfur content limit for the No. 7 Lime Kiln (LK07) under Georgia Rule 391-3-1-.02(2)(g).

Condition No. 3.4.4 specifies the opacity limit for the Lime Conveyor System (OPG8), the North Lime Slaker (LK10), and the South Lime Slaker (LK11) under Georgia Rule 391-3-1-.02(2)(b).

Condition No. 3.4.5 specifies the PM limit for the Lime Conveyor System (OPG8), the North Lime Slaker (LK10), and the South Lime Slaker (LK11) under Georgia Rule 391-3-1-.02(2)(e).

Condition No. 3.4.6 specifies the PM limit for the No. 15 Recovery Furnace (RF15) under Georgia Rule 391-3-1-.02(2)(e).

Condition No. 3.4.7 specifies the TRS limit for the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) under Georgia Rule 391-3-1-.02(2)(gg), which subsumes the TRS requirement under 40 CFR 60 Subpart BB.

Condition No. 3.4.8 specifies the opacity limit for the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) under Georgia Rule 391-3-1-.02(2)(b).

Condition No. 3.4.9 specifies the PM limit for the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) under Georgia Rule 391-3-1-.02(2)(e).

Condition No. 3.4.10 specifies the fuel sulfur content limit for the No. 13 Power Boiler (PB13) under Georgia Rule 391-3-1-.02(2)(g).

Condition No. 3.4.11 specifies that on-specification used oil may be burned in the No. 7 Lime Kiln (LK07) and the No. 13 Power Boiler (PB13) provided it meets applicable fuel sulfur content limits. This condition was established to prevent the exceedance of any established limits as a result of firing used oil. After the completion of the Boiler MACT/Regional Haze PSD Project, this condition will become null and void and will be replaced by Condition No. 3.4.12.

Condition No. 3.4.12 specifies that, after completion of the Boiler MACT/Regional Haze PSD Project, on-specification used oil may be burned in the No. 7 Lime Kiln (LK07) provided it meets applicable fuel sulfur content limits. This condition was established to prevent the exceedance of any established limits as a result of firing used oil. After completion of the Boiler MACT/Regional Haze PSD Project, this condition will replace Condition No 3.4.11. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 3.4.13 specifies the opacity limit for the K2 Fines Cyclone (AP06) under Georgia Rule 391-3-1-.02(2)(b).

Condition No. 3.4.14 specifies the PM limit for the K2 Fines Cyclone (AP06) under Georgia Rule 391-3-1-.02(2)(e).

Condition No. 3.4.15 specifies the VOC limit for the Box Plant (BP) established for avoidance of Georgia Rule 391-3-1-.02(2)(mm).

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.

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal	
4.1.1	4.1.1			
4.1.2	4.1.2			
4.1.3	4.1.3	a.		
		b.		
		c.	Modified	R
		d.		
		e.		
		f.		
		g.		
		h.		
		i.		
		j.		
		k.		
		l.		
		m.		
		n.	Modified	R
		o.	Modified	R
		p.		
		q.		
		r.		
		s.		
		t.		
u.				
v.				
w.				
x.	Added	R		
y.	Added	R		
z.	Added	R		
aa.	Added	R		
bb.	Added	R		

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
4.1.3	cc.	4.1.3	cc.	Added	R
	dd.		dd.	Added	R
	ee.		ee.	Added	R
	ff.		ff.	Added	R
	gg.		gg.	Added	R
4.1.4					
4.1.5				Added, Modified	2, R

Condition No. 4.1.3 specifies the appropriate methods to be used in performance testing.

- Paragraph c. was modified in this Title V Renewal Permit to add ASME PTC 19.10-1981 [Part 10] as an alternative to Method 3B.
- Paragraph n. was modified in this Title V Renewal Permit to replace DI/MEOH-94.02 with DI/MEOH 94.03.
- Paragraph o. was modified in this Title V Renewal Permit to add Method 320, Method 18, ASTM D6420-99, and ASTM 6348-03 and the test method specification under 40 CFR 63 Subpart S.
- Paragraph x. through gg. specify the test methods for conducting performance tests under 40 CFR 63 Subpart DDDDD. These paragraphs were added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.1.5 requires the facility to submit NSPS or NESHAP test reports to the USEPA’s Central Data Exchange. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2 and was modified in this Title V Renewal Permit to update the electronic reporting system.

B. Specific Testing Requirements

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
4.2.1		4.2.1			
4.2.2	a.	4.2.2	a.	Modified	R
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
4.2.3		4.2.7			
4.2.4	a.	4.2.3	a.		
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal	
4.2.5	4.2.4			
4.2.6	4.2.5			
4.2.7	4.2.6	Modified	R	
				a. i.
				ii.
				iii.
b.				
4.2.8		Added	R	
4.2.9	4.2.8	Added	2	
4.2.10	4.2.9	Added	2	
4.2.11	4.2.10	Added	2	
4.2.12	4.2.11	Added	2	
4.2.13	4.2.12	Added	2	
4.2.14	4.2.13	Added	2	
				a.
				b.
				c.
				d.
				e.
				f.

1. Individual Equipment

Condition No. 4.2.1 requires performance testing to be done on the listed equipment for the listed pollutants:

- PM: No. 7 Lime Kiln (LK07); No. 13 Power Boiler (PB13); No. 15 Recovery Furnace (RF15); and No. 15 Recovery Furnace Smelt Dissolving Tank (RF10);
- SO₂: No. 13 Power Boiler (PB13);
- NO_x: No. 13 Power Boiler (PB13); and
- TRS: No. 15 Recovery Furnace Smelt Dissolving Tank (RF10).

Condition No. 4.2.2 specifies the frequency for each performance test for the equipment and pollutants listed in Condition No. 4.2.1: annually for each PM, SO₂, and NO_x test and biennially for each TRS test. This condition also lists the specifications for testing more or less frequently based on test results and the requirements for submittal of test reports and operational parameters. The NOTE paragraph, which clarifies testing requirements for compliance with the SO₂ PSD limits for the No. 13 Power Boiler (PB13), has been modified in this Title V Renewal Permit to include reference to the condition that will be applicable after completion of the Boiler MACT/Regional PSD Project.

Condition No. 4.2.3 specifies the written notice required prior to any performance test required under 40 CFR Part 63.

Condition No. 4.2.4 specifies the performance testing requirements for the Biological Treatment System (AP18) under 40 CFR 63 Subpart S when used to demonstrate compliance with the collection and treatment requirements under Subpart S.

Condition No. 4.2.5 specifies the options for performing testing on the Biological Treatment System (AP18) to determine compliance under 40 CFR 63 Subpart S should a monitoring parameter excursion occur.

Condition No. 4.2.6 specifies that Condition Nos. 4.1.2 and 4.2.7 do not apply for the purposes of complying with Condition No. 4.2.5.

Condition No. 4.2.7 specifies the periodic performance testing requirements for all emission sources subject to 40 CFR 63.443, 40 CFR 63.444, and 40 CFR 63.445. The first periodic test must be conducted by September 7, 2015, and subsequent tests every 60 months thereafter. This condition was replaced in this Title V Renewal Permit to include the new periodic testing requirement of 40 CFR 63 Subpart S.

Condition No. 4.2.8 lists the specific requirements for performance test reports under 40 CFR 63 Subpart S. This condition was added in this Title V Renewal Permit to include the new requirement of 40 CFR 63 Subpart S.

Condition No. 4.2.9 specifies the initial performance testing requirements for determining compliance with the CO PSD BACT limit for the No. 13 Power Boiler (PB13). This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.2.10 specifies the periodic performance testing requirements for determining compliance with the CO PSD BACT limit for the No. 13 Power Boiler (PB13). This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.2.11 specifies the initial compliance demonstrations through performance testing for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.2.12 specifies the periodic compliance demonstrations through performance testing for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.2.13 specifies the initial and periodic tune-up requirements for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 4.2.14 specifies the requirements for the one-time energy assessment for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

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

None applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition No. 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

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal		
5.2.1	a.	5.2.1	a.				
	b.		b.				
	c.		c.	Modified	2		
	d.		d.	Added	2		
5.2.2	a.	5.2.2	a.				
	b.		b.				
	c.		c.				
	d.		d.				
5.2.3	a.	5.2.3	a.				
	b.		b.				
5.2.4		5.2.4					
5.2.5		5.2.5					
5.2.6	a.	5.2.6	a.				
	b.		i.	b.	i.		
			ii.		ii.		
5.2.7	a.	5.2.7	a.				
	b.		b.				
	c.		c.				
	d.		d.				
	e.		e.				
	f.		i.	f.	i.		
			ii.		ii.		
5.2.8	a.	5.2.8	a.				
	b.		b.				
	c.		c.				
5.2.9		5.2.9					
5.2.10	a.	5.2.10	a.				
	b.		b.				
	c.		c.				
	d.		d.				

Renewal Condition No.	Existing Condition No.	Action Taken	Amendment No. or Renewal
5.2.11	a.		
	b.		
	c.		
	d.		
5.2.12	5.2.19	Added	2
5.2.13	5.2.20	Added	2
5.2.14	5.2.12		
5.2.15	5.2.13		
5.2.16	5.2.14		
5.2.17	5.2.15		
5.2.18		Added	R
5.2.19	5.2.16		
5.2.20	5.2.17		
5.2.21	5.2.18		

1. Individual Equipment

Condition No. 5.2.1 specifies the pollutants that must be continuously monitored and recorded for the listed equipment.

Paragraph	Equipment (Source Code)	Monitored Pollutants
a.	No. 7 Lime Kiln (LK07)	Opacity TRS Oxygen
b.	No. 15 Recovery Furnace (RF15)	Opacity TRS NO _x Oxygen
c.	No. 13 Power Boiler (PB13)	Opacity
d.	No. 13 Power Boiler (PB13)	Oxygen

- Paragraph a.: Opacity is monitored as a requirement of 40 CFR 63 Subpart MM and to ensure compliance with Georgia Rule 391-3-1-.02(2)(b). TRS is monitored as a requirement of 40 CFR 60 Subpart BB, which subsumes Georgia Rule 391-3-1-.02(2)(gg).
- Paragraph b.: Opacity is monitored as a requirement of 40 CFR 63 Subpart MM and 40 CFR 60 Subparts Db and BB, which subsume Georgia Rule 391-3-1-.02(2)(b). TRS is monitored as a requirement of 40 CFR 60 Subpart BB and to ensure compliance with Georgia Rule 391-3-1-.02(2)(gg). NO_x is monitored to ensure compliance with the PSD limit.
- Paragraph c.: Opacity is monitored as a requirement of 40 CFR 63 Subpart DDDDD and 40 CFR 60 Subpart D and to ensure compliance with Georgia Rule 391-3-1-.02(2)(d).

This paragraph was modified to include the citation for Subpart DDDDD as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

- Paragraph d.: Oxygen is monitored to demonstrate compliance with the CO PSD BACT limit and the CO limit under 40 CFR 63 Subpart DDDDD. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 5.2.2 specifies the parameters that must be continuously monitored and recorded for the listed equipment.

Paragraph	Equipment (Source Code)	Monitored Parameters
a.	No. 15 Recovery Furnace Smelt Dissolving Tank Scrubber (AP15)	Scrubbant Type (Fillback or Water) Scrubbant Flow Rate Fan Motor Current
b.	Steam Stripper (AP17)	Process Wastewater Feed Rate (condensate flow) Steam Feed Rate (steam flow) Process Wastewater Column Feed (condensate feed) Temperature Steam Pressure Steam-to-Condensate Ratio
c.	White Liquor Scrubber (WLS1)	Pressure Drop Scrubbant Flow Rate
d.	Bypass Lines in the Closed-Vent System	Presence of Gas Stream Flow (at least once per fifteen minutes)

- Paragraph a. was established to provide reasonable assurance of compliance with the PSD limits and is a requirement of 40 CFR 63 Subpart MM, which subsumes 40 CFR 60 Subpart BB. The specified monitoring parameters are approved alternative parameters to those prescribed in Subparts MM and BB.
- Paragraph b. is a requirement of 40 CFR 63 Subpart S. The listed monitoring parameters are those specified in 40 CFR 63.456(g) with steam pressure as an additional alternative parameter.
- Paragraph c. was established to provide reasonable assurance of compliance with the TRS removal efficiency requirement for avoidance of 40 CFR 52.21.
- Paragraph d. is a requirement of 40 CFR 63 Subpart S.

Condition No. 5.2.3 specifies the parameters that must be monitored and recorded at the specified frequency for the listed equipment.

Paragraph	Equipment (Source Code)	Monitored Parameter	Monitoring Frequency
a.	No. 7 Lime Kiln Dust Scrubber (AP03)	Scrubbant Flow Rate	Average of Data from Each 8-hour Shift
b.	No. 7 Lime Kiln Electrostatic Precipitator (AP01) No. 15 Recovery Furnace Electrostatic Precipitator (AP14) No. 13 Power Boiler Electrostatic Precipitator (AP07)	Average Total Secondary Power (calculated) Secondary Current Secondary Voltage	Arithmetic Average for Each 8-hour Shift

- Paragraph a. was established to provide a reasonable assurance of compliance with Georgia Rule 391-3-1-.02(2)(e).
- Paragraph b. was established to provide a reasonable assurance of compliance with Georgia Rule 391-3-1-.02(2)(e).

Condition No. 5.2.4 specifies the sampling and analysis requirements for each shipment of tall oil pitch received for firing in the No. 7 Lime Kiln (LK07). This condition was established to provide a reasonable assurance of compliance with the fuel sulfur content limit in Georgia Rule 391-3-1-.02(2)(g).

Condition No. 5.2.5 specifies the daily sampling and analysis requirements for as-bunkered coal to be fired in the No. 13 Power Boiler (PB13). This condition is a requirement of 40 CFR 60 Subpart D and was also established to provide a reasonable assurance of compliance with the SO₂ PSD limits and with the fuel sulfur content limit in Georgia Rule 391-3-1-.02(2)(g).

Condition No. 5.2.6 specifies the daily monitoring requirements under MACT I, Phase 1 of 40 CFR 63 Subpart S for the Steam Stripper (AP17) and the Biological Treatment System (AP18), when it is used to demonstrate compliance.

Condition No. 5.2.7 specifies the requirements with which each enclosure and closed vent system must comply as a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 5.2.8 specifies the requirements for the monthly visual inspections of each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d). This condition is a MACT I, Phase 1 requirement of 40 CFR 63 Subpart S.

Condition No. 5.2.9 specifies the daily monitoring requirements for the K2 Fines Cyclone (AP06). This condition was established for avoidance of 40 CFR 52.21 and to provide a reasonable assurance of compliance with the opacity limit of Georgia rule 391-3-1-.02(2)(b) and the PM limit of Georgia Rule 391-3-1-.02(2)(e).

Condition No. 5.2.10 specifies the monitoring, sampling, analyzing, and recording requirements for each continuous opacity monitoring system (COMS) on the No. 7 Lime Kiln (LK07) and the No. 15 Recovery Furnace (RF15) under 40 CFR 63 Subpart MM.

Condition No. 5.2.11 specifies the monitoring, sampling, analyzing, and recording requirements for each continuous parameter monitoring system (CPMS) on the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10) under 40 CFR 63 Subpart MM.

Condition No. 5.2.12 specifies the initial compliance demonstrations through fuel analysis for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 5.2.13 specifies the periodic compliance demonstrations through fuel analysis for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition Nos. 5.2.14 through 5.2.21 specify the Compliance Assurance Monitoring (CAM) requirements for the subject pollutant-specific emission units (PSEU). For further information, please see C. Compliance Assurance Monitoring (CAM) below.

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

None applicable.

C. Compliance Assurance Monitoring (CAM)

International Paper - Savannah operates several pieces of equipment that are considered pollutant-specific emission units under 40 CFR Part 64. A pollutant-specific emission unit (PSEU), as defined in 40 CFR 64.1, is subject to the requirements of CAM if the unit (1) is subject to a emission limitation or standard for the applicable regulated air pollutant, (2) uses a control device to comply with any such emission standard, and (3) has a pre-controlled potential-to-emit (PTE) for the applicable regulated air pollutant greater than 100 percent of the major source threshold (on a tons per year basis). Therefore, the equipment listed in the table below is subject to 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM).

Emission Unit (Source Code)	Control Device (Source Code)	Pollutant
No. 7 Lime Kiln (LK07)	Electrostatic Precipitator (AP01)	PM
No. 15 Recovery Furnace (RF15)	Electrostatic Precipitator (AP14)	PM
No. 13 Power Boiler (PB13)	Electrostatic Precipitator (AP07)	PM
No. 15 Recovery Furnace Smelt Dissolving Tank (RF10)	Scrubber (AP15)	PM
No. 15 Recovery Furnace Smelt Dissolving Tank (RF10)	Scrubber (AP15)	TRS
Lime Conveyor System (OPG8)	Scrubber (AP03)	PM

Although the No. 7 Lime Kiln, No. 15 Recovery Furnace, the No. 15 Recovery Furnace Smelt Dissolving Tank, and No. 13 Power Boiler are subject to a MACT standard, each is subject to a more stringent standard and, therefore, is subject to CAM. The applicable MACT standard and the more stringent standard for the aforementioned equipment is shown in the table below.

Emission Unit (Source Code)	Applicable 40 CFR 63 Subpart	More Stringent Standard
No. 7 Lime Kiln (LK07)	MM	Georgia Rule (e)
No. 15 Recovery Furnace (RF15)	MM	Georgia Rule (e)
No. 13 Power Boiler (PB13)	DDDDD	PSD
No. 15 Recovery Furnace Smelt Dissolving Tank (RF10)	MM	Georgia Rule (e)

Condition No. 5.2.14 lists each subject PSEU and the applicable pollutant.

Condition No. 5.2.15 specifies CAM requirements for PM emissions from the No. 7 Lime Kiln (LK07). This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the opacity and monitoring and recording the total secondary power once per eight-hour shift for the ESP.

Condition No. 5.2.16 specifies CAM requirements for PM emissions from the No. 15 Recovery Furnace (RF15). This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the opacity and monitoring and recording the total secondary power once per eight-hour shift for the ESP.

Condition No. 5.2.17 specifies CAM requirements for PM emissions from the No. 13 Power Boiler (PB13). This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the opacity with a six-minute averaging period and monitoring and recording the total secondary power once per eight-hour shift for the ESP.

Condition No. 5.2.18 specifies CAM requirements for PM emissions from the No. 13 Power Boiler (PB13) after the effective date of 40 CFR 63 Subpart DDDDD. This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the opacity with a daily block averaging period and monitoring and recording the total secondary power once per eight-hour shift for the ESP. This condition was modified in this Title V Renewal Permit to reflect the opacity monitoring requirement under Subpart DDDDD.

Condition No. 5.2.19 specifies the CAM requirements for the PM emissions from the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10). This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the scrubbant flow rate and fan motor current for the scrubber.

Condition No. 5.2.20 specifies the CAM requirements for the TRS emissions from the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10). This condition requires the facility to comply with the listed performance criteria, which includes continuously monitoring and recording the scrubbant flow rate, fan motor current, and fillback valve position for the scrubber.

Condition No. 5.2.21 specifies the CAM requirements for the PM emissions from the Lime Conveyor System (OPG8). This condition requires the facility to comply with the listed performance criteria, which includes monitoring and recording the scrubbant flow rate for the scrubber once per eight-hour shift.

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.

Template Condition Nos. 6.1.3 and 6.1.4 were updated in September 2011 and in Amendment No. 2631-051-0007-V-02-1 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
6.1.1		6.1.1			
6.1.2		6.1.2			
6.1.3		6.1.3		Modified	1
6.1.4	a.	6.1.4	a.	Modified	1
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		
6.1.5	a.	6.1.5	a.		
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		
6.1.6		6.1.6			

Condition No. 6.1.7

Condition No. 6.1.7 specifies the excess emissions, exceedances, excursions, and additional listed requirements that must be reported in the quarterly report required by Condition No. 6.1.4. Each reportable requirement is discussed individually below along with any changes to the requirements of this condition.

Condition No. 6.1.7.a. – Excess Emissions

Renewal Condition No.			Existing Condition No.			Action Taken	Amendment No. or Renewal
6.1.7	a.	i.	6.1.7	a.	i.		
		ii.			ii.		

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal				
6.1.7	a.	iii.	6.1.7	a.	iii.				
		iv.			iv.				
		v.			v.				
		vi.			A.	A.			
					B.	B.			
					C.	C.			
		vii.			xi.	Added	2		
		viii.			vii.	Modified	R		
		ix.			A.	viii.	A.	Modified	R
					B.		B.		
					C.		C.		
x.	ix.								
xi.	x.								

Paragraph i. defines an excess emission for the average TRS concentration from the No. 7 Lime Kiln (LK07) under 40 CFR 60 Subpart BB, which subsumes Georgia Rule 391-3-1-.02(2)(gg).

Paragraph ii. defines an excess emission for the average TRS concentration from the No. 15 Recovery Furnace (RF15) under 40 CFR 60 Subpart BB and Georgia Rule 391-3-1-.02(2)(gg).

Paragraph iii. defines an excess emission for the opacity from the No. 15 Recovery Furnace (RF15) under 40 CFR 60 Subpart Db, which subsumes 40 CFR 60 Subpart BB and Georgia Rule 391-3-1-.02(2)(b).

Paragraph iv. defines an excess emission for average NOX concentration from the No. 15 Recovery Furnace (RF15) under 40 CFR 52.21.

Paragraph v. defines an excess emission for the opacity from the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart Db and Georgia Rule 391-3-1-.02(2)(d).

Paragraph vi. defines an excess emission for SO₂ emissions for the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(g). After the completion of the Boiler MACT/Regional Haze PSD Project, this paragraph will become null and void and will be replaced by paragraph vii.

Paragraph vii. defines an excess emission for SO₂ emissions for the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(g) after completion of the Boiler MACT/Regional Haze PSD Project. After completion of the Boiler MACT/Regional Haze PSD Project, this paragraph will replace paragraph vi. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Paragraph viii. defines reportable periods of excess emission for the Steam Stripper (AP17) as defined in 40 CFR 63 Subpart S. This paragraph was modified in this Title V Renewal Permit to remove the startup, shutdown, and malfunction (SSM) provisions, which have been removed from Subpart S.

Paragraph ix. defines periods of excess emissions for the LVHC and HVLC systems under 40 CFR 63 Subpart S. This paragraph was modified in this Title V Renewal Permit to remove the startup, shutdown, and malfunction (SSM) provisions, which have been removed from Subpart S.

Paragraph x. defines an excess emission for the pulping process condensate collection (total HAP mass collected) under 40 CFR 63 Subpart S.

Paragraph xi. defines an excess emission for the pulping process condensate treatment (total HAP removed) under 40 CFR 63 Subpart S.

Condition No. 6.1.7.b. – Exceedances

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal	
6.1.7	b.	6.1.7	b.	i.		
				ii.		
				iii.		
				iv.		
				v.		
				vi.		
				vii.		
				viii.		
				ix.	Modified	R
				x.	Modified	R
				xi.		
				xii.		
				xiii.	Modified	R
				xiv.		
				xv.	Added	2

Paragraph i. defines an exceedance for the electric output for sale from the No. 15 Recovery Furnace (RF15) or the No. 13 Power Boiler (PB13) for avoidance of both 40 CFR 60 Subpart Da and 40 CFR 72 Subpart A.

Paragraph ii. defines an exceedance for the fuel sulfur content of the fuel fired in the No. 7 Lime Kiln (LK07) or the No. 13 Power Boiler (PB13) under Georgia Rule 391-3-1-.02(2)(g).

Paragraph iii. defines an exceedance for the VOC emissions from the Poultry Line (PL) for avoidance of 40 CFR 52.21.

Paragraph iv. defines an exceedance for the VOC emissions from the No. 2 Poultry Line (PL2) for avoidance of 40 CFR 52.21.

Paragraph v. defines an exceedance for the VOC emissions from the Box Plant (BP) for avoidance of Georgia Rule 391-3-1-.02(2)(mm).

Paragraph vi. defines an exceedance for organic HAP applied to product and packaging rotogravure or wide-web flexographic printing presses in the Box Plant under 40 CFR 63 Subpart KK.

Paragraph vii. defines an exceedance for the opacity from the No. 15 Recovery Furnace (RF15) under 40 CFR 63 Subpart MM.

Paragraph viii. defines an exceedance for the opacity from the No. 7 Lime Kiln (LK07) under 40 CFR 63 Subpart MM.

Paragraph ix. defines an exceedance for the scrubbant flow rate for the No. 15 Recovery Furnace Smelt Dissolving Tank Vent Scrubber (AP15) under 40 CFR 63 Subpart MM. This paragraph was modified in this Title V Renewal Permit to allow for the use of the exceedance value determined during the most recent performance test in place of the listed exceedance value.

Paragraph x. defines an exceedance for the fan motor amperage for the No. 15 Recovery Furnace Smelt Dissolving Tank Vent Scrubber (AP15) under 40 CFR 63 Subpart MM. This paragraph was modified in this Title V Renewal Permit to allow for the use of the exceedance value determined during the most recent performance test in place of the listed exceedance value.

Paragraph xi. defines an exceedance for facility-wide virgin pulp fiber production for avoidance of 40 CFR 52.21.

Paragraph xii. defines an exceedance for the fuel oil burned in the No. 15 Recovery Furnace (RF15) meeting the definition of “very low sulfur oil” under 40 CFR 60 Subpart Db, which subsumes Georgia Rule 391-3-1-.02(2)(g).

Paragraph xiii. defines an exceedance for the annual capacity factor for fuel oil and natural gas fired in the No. 15 Recovery Furnace (RF15) for avoidance of the NO_x emission limits of 40 CFR 60 Subpart Db. This condition was modified in this Title V Renewal Permit to correct the citation.

Paragraph xiv. defines an exceedance for the hourly SO₂ limit during any 24-hour period from the No. 13 Power Boiler (PB13) that was established as part of the No. 15 Recovery Furnace PSD Project. After the completion of the Boiler MACT/Regional Haze PSD Project, this paragraph will become null and void and will be replaced by paragraph xv.

Paragraph xv. defines an exceedance for the hourly SO₂ limit during any 24-hour period from the No. 13 Power Boiler (PB13) that was established as part of the No. 15 Recovery Furnace PSD Project. After completion of the Boiler MACT/Regional Haze PSD Project, this paragraph will replace paragraph vi. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.1.7.c. – Excursions

Renewal Condition No.			Existing Condition No.			Action Taken	Amendment No. or Renewal
6.1.7	c.	i.	6.1.7	c.	i.		
		ii.			ii.	Modified	R
		iii.			iii.		

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal				
6.1.7	c.	iv.	6.1.7	c.	iv.				
		v.			A.	v.	A.	Modified	R
					B.		B.		
		vi.			vi.				
		vii.			xii.	Added	2		
		viii.			A.	vii.	A.	Modified	R
					B.		B.		
		ix.			viii.	Modified	R		
		x.			ix.				
		xi.			A.	x.	A.	Modified	R
					B.		B.		
		xii.			xi.				
		xiii.			xii.	Added	2		
		xiv.				Added	R		
		xv.				Added	R		

Paragraph i. defines an excursion for the total secondary power for the No. 7 Lime Kiln Electrostatic Precipitator (AP01) under Georgia Rule 391-3-1-.02(2)(e).

Paragraph ii. defines an excursion for the scrubbant flow rate for the No. 7 Lime Kiln Dust Scrubber (AP03) for avoidance of 40 CFR 52.21 and under Georgia Rules 391-3-1-.02(2)(b) and 391-3-1-.02(2)(e). This paragraph was modified in this Title V Renewal Permit to allow for the use of the excursion value determined during the most recent performance test in place of the listed excursion value.

Paragraph iii. defines an excursion for the total secondary power for the No. 15 Recovery Furnace Electrostatic Precipitator (AP14) under Georgia Rule 391-3-1-.02(2)(e).

Paragraph iv. defines an excursion for the fallback valve position on the No. 15 Recovery Furnace Smelt Dissolving Tank Vent Scrubber (AP15) for avoidance of 40 CFR 52.21 and under Georgia Rule 391-3-1-.02(2)(gg), both of which subsume 40 CFR 60 Subpart BB.

Paragraph v. defines excursions for the scrubbant flow rate and fan motor current for the No. 15 Recovery Furnace Smelt Dissolving Tank Vent Scrubber (AP15) under 40 CFR 52.21, for avoidance of 40 CFR 52.21, and under Georgia Rules 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), and 391-3-1-.02(2)(gg), all of which subsume 40 CFR 63 Subpart MM and 40 CFR 60 Subpart BB. This paragraph was modified in this Title V Renewal Permit to allow for the use of the excursion values determined during the most recent performance test in place of the listed excursion values.

Paragraph vi. defines an excursion for the total secondary power for the No. 13 Power Boiler Electrostatic Precipitator (AP07) under 40 CFR 52.21, which subsumes 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(d).

Paragraph vii. defines an excursion for the O₂ concentration for the No. 13 Power Boiler for demonstrating compliance with the CO PSD BACT limit and the CO limit under 40 CFR 63 Subpart DDDDD. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Paragraph viii. defines an excursion for the steam-to-condensate ratio for the Steam Stripper (AP17) under MACT I, Phase 1 of 40 CFR 63 Subpart S. This paragraph was modified in this Title V Renewal Permit to allow for the use of the excursion value determined during the most recent performance test in place of the listed excursion value.

Paragraph ix. defines an excursion for the average COD-to-horsepower of the Biological Treatment System (AP18) when used to demonstrate compliance under MACT I, Phase 1 of 40 CFR 63 Subpart S. This paragraph was modified in this Title V Renewal Permit to allow for the use of the excursion value determined during the most recent performance test in place of the listed excursion value.

Paragraph x. defines an excursion for the high level probe on the K2 Fines Cyclone (AP06) for avoidance of 40 CFR 52.21 and under Georgia Rules 391-3-1-.02(2)(b) and 391-3-1-.02(2)(e).

Paragraph xi. defines excursions for the scrubbant flow rate and pressure drop for the White Liquor NCG Scrubber (WLS1) for avoidance of 40 CFR 52.21 in conjunction with the MACT I, Phase 2 requirements of 40 CFR 63 Subpart S. This paragraph was modified in this Title V Renewal Permit to allow for the use of the excursion values determined during the most recent performance test in place of the listed excursion values.

Paragraph xii. defines an excursion for scrubbing TRS gas streams from Emission Groups LVH1 and LVH2 in the White Liquor NCG Scrubber (WLS1) prior to combustion in the No. 13 Power Boiler (PB13) for avoidance of 40 CFR 52.21 in conjunction with the MACT I, Phase 2 requirements of 40 CFR 63 Subpart S.

Paragraph xiii. defines an excursion for the SO₂ emissions from the No. 13 Power Boiler (PB13) for demonstrating compliance with the Regional Haze SO₂ emission limit. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Paragraph xiv. defines an excursion for the HCl emissions as determined through fuel analyses under 40 CFR 63 Subpart DDDDD. This paragraph was added in this Title V Renewal Permit to include the Boiler MACT requirement.

Paragraph xv. defines an excursion for the Hg emissions as determined through fuel analyses under 40 CFR 63 Subpart DDDDD. This paragraph was added in this Title V Renewal Permit to include the Boiler MACT requirement.

Condition No. 6.1.7.d. – Additional Requirement to Include in Required Report

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal	
6.1.7	d.	i.	6.1.7	d.	i.	
		ii.			ii.	
		iii.			iii.	
		iv.			iv.	
		v.			v.	
		vi.			vi.	
		vii.			vii.	
		viii.			viii.	
		ix.			ix.	
		x.			x.	
		xi.			xi.	
		xii.			xiii.	
		xiii.			xii.	Added

Paragraph i. requires the facility to submit results of the tall oil pitch shipment analyses to provide a reasonable assurance of compliance with the limits under 40 CFR 52.21, 40 CFR 60 Subpart D, and Georgia Rule 391-3-1-.02(2)(g).

Paragraph ii. requires the facility to submit the annual capacity for fuel oil and natural gas for the No. 15 Recovery Furnace (RF15) for each month in the reporting period for avoidance of the NO_x emission limits of 40 CFR 60 Subpart Db.

Paragraph iii. requires the facility to submit a statement that the records of fuel supplier certifications maintained represents all fuel oil fired in the No. 15 Recovery Furnace (RF15) during the relevant quarter to provide reasonable assurance of compliance with 40 CFR 60 Subpart Db.

Paragraph iv. requires the facility to report any periods of downtime of the Pulping Process Condensate Collection System (PPCC), the Steam Stripper (AP17), the No. 13 Power Boiler (PB13), or the No. 7 Lime Kiln (LK07).

Paragraph v. requires the facility to submit the results of calculations performed during the referenced performance test when the Biological Treatment System (AP18) is used to demonstrate compliance with the MACT I, Phase 1 treatment requirements of 40 CFR 63 Subpart S.

Paragraph vi. requires the facility to submit any period when ten consecutive opacity averages are above 20 percent for the No. 15 Recovery Furnace (RF15) under 40 CFR 63 Subpart MM.

Paragraph vii. requires the facility to submit any period when ten consecutive opacity averages are above 20 percent for the No. 7 Lime Kiln (LK07) under 40 CFR 63 Subpart MM.

Paragraph viii. requires the facility to submit any six-minute period the average opacity from the No. 15 Recovery Furnace (RF15) is greater than 35 percent under 40 CFR 63 Subpart MM.

Paragraph ix. requires the facility to submit any six-minute period the average opacity from the No. 7 Lime Kiln (LK07) is greater than 20 percent under 40 CFR 63 Subpart MM.

Paragraph x. requires the facility to submit the twelve-month rolling total downtime and operating time of the White Liquor NCG Scrubber (WLS1) for each month during the reporting period for avoidance of 40 CFR 52.21.

Paragraph xi. requires the facility to submit the twelve-month rolling total of bark fired in the No. 13 Power Boiler (PB13). This paragraph was established as part of the No. 13 Power Boiler Bark Burning Project.

Paragraph xii. requires the facility to include in each quarterly report each opacity deviation from the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD.. This paragraph was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Paragraph xiii. requires the facility to submit a list of all operational parameters determined in accordance with Condition No. 4.2.2. The operational parameters required to be monitored and the current operating ranges for each parameter must be included in the list.

B. Specific Record Keeping and Reporting Requirements

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
6.2.1	a.	6.2.1	a.	Modified	R
	b.		b.		
6.2.2		6.2.2		Modified	R
6.2.3		6.2.3			
6.2.4		6.2.4			
6.2.5	a.	6.2.5	a.		
	b.		b.		
	c.		c.		
6.2.6	a.	6.2.6	a.		
	b.		b.		
6.2.7	a.	6.2.7	a.		
	b.		b.		
	c.		c.		
6.2.8	a.	6.2.8	a.		
	b.		b.		
6.2.9		6.2.9			
6.2.10		6.2.10			
6.2.11	a.	6.2.40	a.	Added	2
	b.		b.		
	c.		c.		
6.2.12		6.2.42		Added	2
6.2.13		6.2.43		Added	2

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
6.2.14		6.2.44		Added	2
6.2.15	a.	6.2.45	a.	Added	2
	b.		b.		
	c.		c.		
	d.		d.		
6.2.16	a.	6.2.46	a.	Added	2
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		
	g.		g.		
6.2.17	a.	6.2.47	a.	Added	2
	b.		b.		
	c.		c.		
6.2.18	a.	6.2.48	a.	Added	2
	b.		b.		
	c.		c.		
	d.		d.		
6.2.19	a.	6.2.49	a.	Added	2
	b.		b.		
6.2.20		6.2.50		Added	2
6.2.21		6.2.51		Added	2
6.2.22	a.	6.2.11	a.		
	b.		b.		
6.2.23	a.	6.2.12	a.		
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		
6.2.24	a.	6.2.41	a.	Added	2
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
	f.		f.		
6.2.25	a.	6.2.13	a.		
	b.		b.		
6.2.26	a.	6.2.14	a.		
	b.		b.		

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal	
6.2.27	a.	6.2.15	a.			
	b.		b.			
	c.		c.			
	d.		d.			
6.2.28	a.	6.2.16	a.			
	b.		b.			
	c.		c.			
6.2.29	a.	6.2.17	i.			
			ii.			ii.
			iii.			iii.
	b.		i.			i.
ii.		ii.				
6.2.30	a.	6.2.18	a.			
	b.		b.			
6.2.31		6.2.19				
6.2.32	a.	6.2.21	a.			
	b.		b.			
	c.		c.			
	d.		d.			
	e.		e.			
	f.		f.			
	g.		g.			
	h.		h.			
	i.		i.			
	j.		j.			
	k.		k.			
	l.		l.			
6.2.33		6.2.22				
6.2.34	a.			Added	R	
	b.					
6.2.35				Added	R	
6.2.36				Added	R	
6.2.37		6.2.23				
6.2.38		6.2.24				
6.2.39	a.	6.2.25	a.			
	b.		b.			
	c.		c.			
6.2.40	a.	6.2.26	i.			
			ii.			ii.
	b.		i.			i.
			ii.			ii.

Renewal Condition No.		Existing Condition No.		Action Taken	Amendment No. or Renewal
6.2.41	a.	6.2.27	a.		
	b.		b.		
	c.		c.		
	d.		d.		
6.2.42		6.2.28			
6.2.43	a.	6.2.29	a.		
	b.		b.		
	c.		c.		
	d.		d.		
	e.		e.		
6.2.44		6.2.30			
6.2.45		6.2.31			
6.2.46	a.	6.2.32	a.		
	b.		b.		
6.2.47		6.2.33			
6.2.48		6.2.34			
6.2.49	a.	6.2.35	a.		
	b.		b.		
6.2.50		6.2.36			
6.2.51		6.2.37			
6.2.52		6.2.38			
6.2.53		6.2.39			
		6.2.20		Deleted	R

Condition No. 6.2.1 specifies the daily recordkeeping requirements for lime mud feed rate and either percent solids or density of the lime mud feed for the No. 7 Lime Kiln (LK07) under 40 CFR 63 Subpart MM and Georgia Rules 391-3-1-.02(b) and 391-3-1-.02(2)(e). This condition was modified in this Title V Renewal Permit to include the Subpart MM citation, which had erroneously not been included.

Condition No. 6.2.2 specifies the daily recordkeeping requirements for the black liquor solids firing rate and the percent black liquor solids or the black liquor density for the No. 15 Recovery Furnace (RF15) under 40 CFR 63 Subpart MM and Georgia Rules 391-3-1-.02(b) and 391-3-1-.02(2)(e). This condition was modified in this Title V Renewal Permit to include the black liquor solids firing rate requirement and the Subpart MM citation, both of which had erroneously not been included.

Condition No. 6.2.3 specifies the recordkeeping requirements for fuel supplier receipts and certifications for the No. 15 Recovery Furnace (RF15) under 40 CFR 60 Subpart Db.

Condition No. 6.2.4 specifies the daily fuel usage and annual capacity factor records for the No. 15 Recovery Furnace (RF15) under 40 CFR 60 Subpart Db.

Condition No. 6.2.5 specifies the daily fuel usage and steam production records for the No. 13 Power Boiler (PB13) under 40 CFR 52.21, 40 CFR 60 Subpart D, and Georgia Rules 391-3-1-.02(2)(d) and 391-3-1-.02(2)(g).

Condition No. 6.2.6 specifies the recordkeeping requirements for the 30-day and 24-hour SO₂ emission rates from the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(g) for the 30-day records and 40 CFR 52.21 for the 24-hour records. After the completion of the Boiler MACT/Regional Haze PSD Project, this condition will become null and void and will be replaced by Condition No. 6.2.11.

Condition No. 6.2.7 specifies the recordkeeping requirements for documenting the description of the No. 13 Power Boiler Bark Burning Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions.

Condition No. 6.2.8 specifies the demand growth recordkeeping requirements for annual emissions and emissions increases for each NSR pollutant as a result of the No. 13 Power Boiler Bark Burning Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions.

Condition No. 6.2.9 specifies the reporting requirements for the records of Condition No. 6.2.8 as a requirement of the No. 13 Power Boiler Bark Burning Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions.

Condition No. 6.2.10 specifies the recordkeeping requirements for the twelve-month rolling total of bark fired in the No. 13 Power Boiler (PB13) as a requirement of the No. 13 Power Boiler Bark Burning Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions.

Condition No. 6.2.11 specifies the recordkeeping requirements for the 30-day, 24-hour, and twelve-month rolling total SO₂ emission rates from the No. 13 Power Boiler (PB13) under 40 CFR 60 Subpart D and Georgia Rule 391-3-1-.02(2)(g) for the 30-day records, under 40 CFR 52.21 for the 24-hour records, and under the Regional Haze Rule (40 CFR 51.308) for the twelve-month rolling total records. After completion of the Boiler MACT/Regional Haze PSD Project, this condition will replace Condition No. 6.2.6. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.12 requires the facility to submit a compliance plan for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.13 specifies the performance test notification requirements for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.14 specifies the Notification of Compliance Status requirements for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.15 specifies the periodic reporting requirements for the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.16 specifies the recordkeeping requirements for the operation of the No. 13 Power Boiler (PB13) under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.17 specifies the general requirements for recordkeeping under 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.18 specifies the recordkeeping requirements for documenting the description of the Boiler MACT/Regional Haze PSD Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.19 specifies the recordkeeping requirements for annual emissions and emissions increases for each NSR pollutant as a result of the No. 13 Power Boiler Bark Burning Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.20 specifies the reporting requirements for the records of Condition No. 6.2.19 as a requirement of the Boiler MACT/Regional Haze PSD Project. This condition is required for projects that determine PSD applicability by comparing past actual emissions to projected future actual emissions. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.21 specifies the reporting requirements for the results of performance tests conducted to determine compliance with the CO PSD BACT limit for the No. 13 Power Boiler (PB13). This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.22 specifies the recordkeeping requirements for the twelve-month rolling total of power sold to the grid from the No. 15 Recovery Furnace (RF15) and the No. 13 Power Boiler (PB13) for avoidance of both 40 CFR 60 Subpart Da and 40 CFR 72 Subpart A.

Condition No. 6.2.23 specifies the fuel supplier certification recordkeeping requirements for the residual oil fired in the No. 7 Lime Kiln (LK07) and the No. 13 Power Boiler (PB13) under 40 CFR 52.21, 40 CFR 60 Subpart D, and Georgia Rule 391-3-1-.02(2)(g). After the completion of the Boiler MACT/Regional Haze PSD Project, this condition will become null and void and will be replaced by Condition No. 6.2.24.

Condition No. 6.2.24 specifies the fuel supplier certification recordkeeping requirements for the residual oil fired in the No. 7 Lime Kiln (LK07) to provide a reasonable assurance of compliance with the fuel sulfur content limit under Georgia Rule 391-3-1-.02(2)(g). After completion of the Boiler MACT/Regional Haze PSD Project, this condition will replace Condition No. 6.2.23. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 6.2.25 specifies the fuel supplier certification recordkeeping requirements for each shipment of distillate oil received to provide a reasonable assurance of compliance with the fuel sulfur content limit Georgia Rule 391-3-1-.02(2)(g).

Condition No. 6.2.26 specifies the recordkeeping requirements for each shipment of used oil received to provide a reasonable assurance of compliance with the fuel sulfur content limit under Georgia Rule 391-3-1-.02(2)(g).

Condition No. 6.2.27 specifies the recordkeeping requirements for each shipment of tall oil pitch that is fired in the No. 7 Lime Kiln (LK07) to provide a reasonable assurance of compliance with the fuel sulfur content limit under Georgia Rule 391-3-1-.02(2)(g).

Condition No. 6.2.28 recordkeeping requirements for the daily analyses of gross samples of as-bunkered coal that is fired in the No. 13 Power Boiler (PB13 under 40 CFR 52.21, 40 CFR 60 Subpart D, and Georgia Rule 391-3-1-.02(2)(g).

Condition No. 6.2.29 specifies the daily recordkeeping requirements for the periods during which Emission Groups LVH1, LVH2, and HVLC either are controlled by the No. 13 Power Boiler (PB13) or the No. 7 Lime Kiln (LK07) or are exhausted via the bypass stack. This condition was established as an accompaniment to the requirements of 40 CFR 63 Subpart S, 40 CFR 60 Subpart BB, and Georgia Rule 391-3-1-.02(2)(gg).

Condition No. 6.2.30 specifies the recordkeeping requirements for times the total HAP emissions from equipment listed in Condition Nos. 3.3.15 and 3.3.16 are not controlled. This condition was established as an accompaniment to the requirements of 40 CFR 63 Subpart S, 40 CFR 60 Subpart BB, and Georgia Rule 391-3-1-.02(2)(gg).

Condition No. 6.2.31 specifies the recordkeeping requirements for condensate collection under 40 CFR 63 Subpart S.

Condition No. 6.2.32 specifies the recordkeeping requirements for each applicable enclosure opening, closed-vent system, and closed collection system under 40 CFR 63 Subpart S.

Condition No. 6.2.33 specifies the recordkeeping requirements for excess emissions from the Steam Stripper (AP17) under 40 CFR 63 Subpart S.

Condition No. 6.2.34 specifies the recordkeeping for malfunctions under 40 CFR 63 Subpart S. This condition was added in this Title V Renewal Permit to include this new requirement of 40 CFR 63 Subpart S.

Condition No. 6.2.35 specifies the quarterly reporting requirements for malfunctions under 40 CFR 63 Subpart S. This condition was added in this Title V Renewal Permit to include this new requirement of 40 CFR 63 Subpart S.

Condition No. 6.2.36 specifies the recordkeeping requirements for asserting an affirmative defense under 40 CFR 63 Subpart S. This condition was added in this Title V Renewal Permit to include this new requirement of 40 CFR 63 Subpart S.

Condition No. 6.2.37 specifies the reporting requirements whenever sending all of the Pulping Process Condensates (PPCC) to the Biological Treatment System (AP18) due to a failure of the Steam Stripper (AP17). This condition was established as an accompaniment to the requirements of 40 CFR 63 Subpart S, 40 CFR 60 Subpart BB, and Georgia Rule 391-3-1-.02(2)(gg).

Condition No. 6.2.38 specifies the reporting requirements for any mass emission rate test conducted on the Biological Treatment System (AP18) to determine compliance with the MACT I, Phase 1 requirements of 40 CFR 63 Subpart S.

Condition No. 6.2.39 specifies the recordkeeping requirements for the White Liquor NCG Scrubber (WLS1) for avoidance of 40 CFR 52.21.

Condition No. 6.2.40 requires the facility to develop and maintain an SSM plan for all sources used to comply with 40 CFR 63 Subpart MM.

Condition No. 6.2.41 specifies the monitoring exceedances that require the facility to implement corrective action under 40 CFR 63 Subpart MM for the No. 15 Recovery Furnace (RF15), the No. 7 Lime Kiln (LK07), and the No. 15 Recovery Furnace Smelt Dissolving Tank (RF10). Paragraphs a. through d. were modified in this Title V Renewal Permit to allow for the use of the exceedance value determined during the most recent performance test in place of the listed exceedance value.

Condition No. 6.2.42 specifies the recordkeeping requirements for the corrective actions taken in Condition No. 6.2.41 under 40 CFR 63 Subpart MM.

Condition No. 6.2.43 specifies the additional recordkeeping requirements under 40 CFR 63 Subpart MM, which include black liquor solids firing rates, CaO production rates, parameter monitoring data, documentation for compliance determinations, and parameter monitoring ranges.

Condition No. 6.2.44 specifies the recordkeeping requirements for the twelve-month rolling total of facility-wide fiber production for avoidance of 40 CFR 52.21.

Condition No. 6.2.45 specifies the monthly VOC usage recordkeeping requirements for the Poultry Line (PL) and the No. 2 Poultry Line (PL2) for avoidance of 40 CFR 52.21.

Condition No. 6.2.46 specifies the monthly recordkeeping requirements for VOC emissions from the Poultry Line (PL) and the No. 2 Poultry Line (PL2) for avoidance of 40 CFR 52.21.

Condition No. 6.2.47 specifies the recordkeeping requirements for the twelve-month rolling total of VOC emissions from the Poultry Line (PL) and the No. 2 Poultry Line (PL2) for avoidance of 40 CFR 52.21.

Condition No. 6.2.48 specifies the monthly VOC usage recordkeeping requirements for the Box Plant (BP) for avoidance of Georgia Rule 391-3-1-.02(2)(mm).

Condition No. 6.2.49 specifies the monthly recordkeeping requirements for VOC emissions from the Box Plant (BP) for avoidance of Georgia Rule 391-3-1-.02(2)(mm).

Condition No. 6.2.50 specifies the recordkeeping requirements for the twelve-month rolling total of VOC emissions from the Box Plant (BP) for avoidance of Georgia Rule 391-3-1-.02(2)(mm).

Condition No. 6.2.51 specifies the recordkeeping requirements for the total mass and the organic HAP content of material applied on product and packaging rotogravure or wide-web flexographic printing presses in the Box Plant (BP) under 40 CFR 63 Subpart KK.

Condition No. 6.2.52 requires the facility to maintain records of all data and information required by conditions in Section 5.2, in accordance with Condition Nos. 6.1.1 and 6.1.6, and to submit reports in accordance with Condition No. 6.1.4.

Condition No. 6.2.53 requires the facility to include with any application form, report, or compliance certification submitted a certification signed by the appropriate Responsible Official or, if applicable, both Responsible Officials.

Deleted Conditions

Deleted Condition No. 6.2.20 required the facility to develop and maintain an SSM plan for all sources used to comply with 40 CFR 63 Subpart S. This condition was deleted in this Title V Renewal Permit as this requirement has been removed from Subpart S.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

Condition No. 7.14.1 specifies the startup notification requirements for the No. 13 Power Boiler (PB13) after completion of the Boiler MACT/Regional Haze PSD Project. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 7.14.2 specifies the conditions that will become null and void after completion of the Boiler MACT/Regional Haze PSD Project. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 7.14.3 specifies the conditions that will become applicable after completion of the Boiler MACT/Regional Haze PSD Project. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

Condition No. 7.14.4 specifies the condition that will become applicable no later than January 31, 2017 for compliance with 40 CFR 63 Subpart DDDDD. This condition was added as part of the Boiler MACT/Regional Haze PSD Project in Amendment No. 2631-051-0007-V-02-2.

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 No. 8.14.1 was updated in September 2011 and in Title V Amendment No. 2631-051-0007-V-02-1 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition No 8.17.1 was modified to include the citation for 40 CFR 63 Subpart S, which contains an identical requirement for operational practices.

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.