

# Part 70 Operating Permit Amendment

**Permit Amendment No.:** 2676-095-0071-V-02-1      **Effective Date:**

**Facility Name:**      **The Procter & Gamble Paper Products Co.**  
512 Liberty Expressway Southeast  
Albany, Georgia 31705-4147 (Dougherty County)

**Mailing Address:**      P.O. Box 1747  
Albany, Georgia 31702-1747

**Parent/Holding Company:**      The Procter & Gamble Paper Products Company

**Facility AIRS Number:** 04-13-095-00071

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

This amendment authorizes the facility to make process improvements to existing Paper Machines 1APM to 6APM, to install Yankee Dryer 1AYD, and to upgrade Yankee Dryers 2AYD and 3AYD.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2676-095-0071-V-02-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 17646 dated August 30, 2007; any other applications upon which this Permit Amendment or Permit No. 2676-095-0071-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **17** pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2676-095-0071-V-02-0.

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Director  
Environmental Protection Division

## Title V Permit Amendment

The Procter & Gamble Paper Products Company, Albany

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**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

Application No. 17646 is processed as a significant modification with construction because the proposed modification is considered a “change in method of operation” and will require a PSD/NSR review. Nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM/PM<sub>10</sub>) and volatile organic compound (VOC) emissions from this modification project will exceed the respective PSD significant thresholds of pollutants NO<sub>x</sub>, CO, SO<sub>2</sub>, PM/PM<sub>10</sub> and VOC respectively.

The objective of this paper machine project is to modify and to upgrade the individual paper machine components to accommodate advances in paper making technology and to conduct various debottlenecking improvements. This paper machine project includes the installation of a new Yankee Dryer (Source Code: 1AYD) that will serve Paper Machine 1APM and the modification to upgrade two existing Yankee Dryers (Source Codes: 2AYD, 3AYD) serving Paper Machines 2APM and 3APM. Yankee Dryers 1AYD, 2AYD and 3AYD will be designed for natural gas and liquefied petroleum gas (LPG) firing and each burner will have a maximum heat input rating of 95 million Btu per hour (MMBtu/hr). This facility also proposes to conduct miscellaneous debottlenecking and process improvement modification activities for the six paper machines (Source Codes: 1APM to 6APM). The implementation of this proposed project will result in moderate speed increases of paper machines and will enhance the product flexibility of the paper machines.

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### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
1APM	1A Paper Machine (Former, 2 Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.21, 3.3.26, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.9, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	1AVS	Venturi Scrubber
1APD	Predryer Burner for 1APM 150 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.8, 3.3.10, 3.3.25, 3.4.4, 3.4.7, 4.2.2, 6.1.7, 6.2.2, 6.2.6, 6.2.7	None	None
<u>1AYD</u>	<u>Yankee Burner for 1APM 95 10<sup>6</sup> Btu/hr burner</u>	<u>40 CFR 52.21, 391-3-1-.02(2)(g)</u>	3.3.21, 3.3.22, 3.3.23, 3.4.6, 3.5.4, 5.2.11, 5.2.12	<u>None</u>	<u>None</u>
2APM	2A Paper Machine (Former, 3 Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.21, 3.3.26, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.9, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	2AVS	Venturi Scrubber
2APD	Predryer Burner for 2APM 150 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.8, 3.3.10, 3.3.25, 3.4.4, 3.4.7, 4.2.2, 6.1.7, 6.2.2, 6.2.6, 6.2.7	None	None
2AYD	<u>Yankee Burner for 2APM 95 10<sup>6</sup> Btu/hr burner</u>	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.7, 3.3.8, 3.3.21, 3.3.22, 3.3.23, 3.4.4, 3.4.6, 3.5.4, 4.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.6, 6.2.7	None	None
3APM	3A Paper Machine (Former, 2 Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.21, 3.3.26, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.9, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	3AVS	Venturi Scrubber
3APD	Predryer Burner for 3APM 150 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.8, 3.3.10, 3.3.25, 3.4.4, 3.4.7, 4.2.2, 6.1.7, 6.2.2, 6.2.6, 6.2.7	None	None

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3AYD	Yankee Burner for 3APM <u>95 10<sup>6</sup> Btu/hr burner</u>	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.6, 3.3.7, 3.3.8, 3.3.10, 3.3.21, 3.3.22, 3.3.23, 3.4.4, 3.4.6, 3.5.4, 4.2.2, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.2, 6.2.4, 6.2.6, 6.2.7	None	None
4APM	4A Paper Machine (Former, Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.24, 3.3.26, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.9, 6.1.7, 6.2.1, 6.2.2, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	4 AVS	Venturi Scrubber
4APD	Predryer Burner for 4APM 150 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.8, 3.3.10, 3.3.25, 3.4.4, 3.4.7, 4.2.2, 6.1.7, 6.2.2, 6.2.6, 6.2.7	None	None
4AYD	Yankee Burner for 4APM 95 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.6, 3.3.7, 3.3.8, 3.3.10, 3.3.24, 3.3.25, 3.4.4, 3.4.6, 4.2.2, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.2, 6.2.4, 6.2.6, 6.2.7	None	None
5APM	5A Paper Machine (Former, Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.24, 3.3.26, 3.3.27, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.10, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	5ACS, 5AVS, 5DE2	Cyclonic Separator, Venturi Scrubber, Control Device
5APD	Predryer Burner for 5APM 90 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.7, 3.3.8, 3.3.24, 3.4.4, 3.4.6, 4.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.6, 6.2.7	None	None
5AYD	Yankee Burner for 4APM 110 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.7, 3.3.8, 3.3.24, 3.4.4, 3.4.7, 4.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.6, 6.2.7	None	None
6APM	6A Paper Machine (Former, Process and 2 Dry End Stacks)	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63 Subpart A, 40 CFR 63 Subpart JJJJ, <u>40 CFR 64</u>	3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.24, 3.3.26, 3.3.27, 3.5.4, 4.2.1, 4.2.6, 4.2.10, 4.2.11, 5.2.2, 5.2.5, 5.2.10, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	6ACS, 6AVS, 6DE2	Cyclonic Separator, Venturi Scrubber, Control Device
6APD	Predryer Burner for 6APM 90 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.7, 3.3.8, 3.3.24, 3.4.4, 3.4.6, 4.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.6, 6.2.7	None	None
6AYD	Yankee Burner for 6APM 110 10 <sup>6</sup> Btu/hr burner	40 CFR 52.21, 391-3-1-.02(2)(g)	3.2.1, 3.3.7, 3.3.8, 3.3.24, 3.4.4, 3.4.7, 4.2.2, 5.2.3, 5.2.4, 6.1.7,	None	None

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			6.2.6, 6.2.7		
B001	Boiler No. 1 Steam Plant 187 10 <sup>6</sup> Btu/hr boiler	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	3.2.1, 3.3.10, 3.4.1, 3.4.2, 3.4.4, 3.4.7, 4.2.5, 6.1.7, 6.2.2	None	None
B002	Boiler No. 2 Steam Plant 216 10 <sup>6</sup> Btu/hr boiler	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), <u>40 CFR 64</u>	3.2.1, 3.3.8, 3.3.10, 3.3.11, 3.3.17, 3.3.18, 3.3.19, 3.3.20, 3.3.21, 3.3.22, 3.4.1, 3.4.4, 3.4.5, 3.4.7, 3.5.2, 3.5.3, 4.2.3, 4.2.5, 4.2.7, 4.2.8, 4.2.9, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.8, 6.1.7, 6.2.2, 6.2.5, 6.2.14	B002ESP	Wet Electrostatic Precipitator
CAS	Consumer Wraps Production Line A	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.4.3, 4.2.6, 5.2.2, 5.2.5, 5.2.7, 6.1.7, 6.2.10, 6.2.11, 6.2.12, 6.2.13	CA1, CA2	Baghouse, Secondary Filter
CBS	Consumer Wraps Production Line B	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, <u>40 CFR 64</u>	3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.4.3, 4.2.6, 5.2.2, 5.2.5, 5.2.7, 6.1.7, 6.2.10, 6.2.11, 6.2.12, 6.2.13	CB1, CB2	Baghouse, Secondary Filter
CVS	Consumer Wraps Central Vacuum	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), <u>40 CFR 64</u>	3.4.3, 5.2.2, 5.2.5, 5.2.7, 6.1.7	CV1 CV2	Baghouse, Secondary Filter

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

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### 3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The Permittee shall only burn the types of fuel indicated in Table 3.2a for the Predryer and Yankee burners in paper machines 1APM through 6APM and Boilers B001, B002 and B003.  
[391-3-1-.03(2)(c)]

Table 3.2a: List of Fuel Types For Each Emission Source

Equipment	Emission Source (Source Codes)	Fuel Type*
B001	187 10 <sup>6</sup> Btu/hr Boiler – Steam Plant	Gas / Oil
B002	216 10 <sup>6</sup> Btu/hr Boiler – Steam Plant	Wood Waste (Bark) / Peanut Hull / Oil / Plastic / Pecan Hull / Fines / Biomass Materials
B003	175 10 <sup>6</sup> Btu/hr Boiler – Steam Plant	Gas / LPG
1APM	150 10 <sup>6</sup> Btu/hr Predryer Burner -- (1APD)	Gas / LPG / Oil
	<u>95 10<sup>6</sup>Btu/hr Yankee Burner -- (1AYD)</u>	<u>Gas / LPG</u>
2A PM	150 10 <sup>6</sup> Btu/hr Predryer Burner -- (2APD)	Gas / LPG/ Oil
	<u>95 10<sup>6</sup>Btu/hr Yankee Burner -- (2AYD)</u>	<u>Gas / LPG</u>
3A PM	150 10 <sup>6</sup> Btu/hr Predryer Burner -- (3APD)	Gas / LPG/ Oil
	<u>95 10<sup>6</sup>Btu/hr Yankee Burner -- (3AYD)</u>	<u>Gas / LPG</u>
4A PM	150 10 <sup>6</sup> Btu/hr Predryer Burner -- (4APD)	Gas / LPG/ Oil
	95 10 <sup>6</sup> Btu/hr Yankee Burner -- (4AYD)	Gas / LPG/ Oil
5A PM	90 10 <sup>6</sup> Btu/hr Predryer Burner -- (5APD)	Gas / LPG
	110 10 <sup>6</sup> Btu/hr Yankee Burner -- (5AYD)	Gas / LPG
6A PM	90 10 <sup>6</sup> Btu/hr Predryer Burner -- (6APD)	Gas / LPG
	110 10 <sup>6</sup> Btu/hr Yankee Burner -- (6AYD)	Gas / LPG

\* Gas = Natural Gas    Oil = Fuel Oil    LPG = Liquefied Petroleum Gas

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### 3.3 Equipment Federal Rule Standards

- 3.2.21 Upon completion of the paper machine modification project, the Permittee shall not discharge or cause the discharge into the atmosphere from Paper Machine Burners 1AYD, 2AYD, and 3AYD, any emissions, which contain nitrogen oxides and carbon monoxide in excess of the following:  
[BACT, 40 CFR 52.21]

Paper Machine	Burner Source Code	Nitrogen Oxides (lbs/hr)	Carbon Monoxide (lbs/hr)
1APM	1AYD	9.5	14.25
2APM	2AYD	9.5	14.25
3APM	3AYD	9.5	14.25

- 3.3.22 Upon completion of the paper machine modification project, the Permittee shall only burn natural gas and/or liquefied petroleum gas in Paper Machine Burners 1AYD, 2AYD and 3AYD. No fuel oil shall be combusted in Paper Machine Burners 1AYD, 2AYD and 3AYD.  
[BACT, 40 CFR 52.21]

- 3.3.23 Upon completion of the paper machine modification project, the Permittee shall use low NO<sub>x</sub> and CO burners in Paper Machine Burners 1AYD, 2AYD and 3AYD along with good combustion and work practice measures to minimize NO<sub>x</sub> and CO emissions.  
[BACT, 40 CFR 52.21]

- 3.3.24 Upon completion of the paper machine modification project, the Permittee shall not discharge or cause the discharge into the atmosphere from the burners for Paper Machines 4APM, 5APM and 6APM, any emissions, which contain nitrogen oxides and carbon monoxide in excess of the following:  
[40 CFR 52.21]

Paper Machine	Burner Source Code	Nitrogen Oxides (lbs/hr)	Nitrogen Oxides (lbs/hr)	Carbon Monoxides (lbs/hr)
		Natural Gas or LPG	No. 2 Fuel Oil	Natural Gas, LPG or No. 2 Fuel
4APM	4AYD	13.0	16.3	19.5
5APM	5APD	26.1**	*	39.2**
	5AYD			
6APM	6APD	26.1**	*	39.2**
	6AYD			

\* Not Applicable

\*\* Combined Stack Emission Limit

- 3.3.25 Upon completion of the paper machine modification project, the Permittee shall not fire fuel oil in Boilers B001 and B002 and Paper Machine Burners 1APD, 2APD, 3APD, 4APD and 4AYD which contains more than 0.34 percent, by weight, sulfur.  
[40 CFR 52.21, 391-3-1-.02(2)(g)(subsumed)]



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- 3.3.26 Upon completion of the paper machine modification project, the Permittee shall not discharge or cause the discharge into the atmosphere from the stacks of Paper Machines 1APM through 6APM PM/PM<sub>10</sub> in excess of the following when firing any fuel type allowed for both the Predryer and Yankee Burners.

Paper Machine	PM/PM <sub>10</sub> (lbs/hr)
1APM	17.19
2APM	16.72
3APM	19.46
4APM	19.17
5APM	13.89
6APM	15.36

The combined particulate matter emission from the respective Former, Process, Repulper, Dry End, and Roof Exhauster stacks for each Paper Machine (Emission Unit ID Nos. 1APM, 2APM, 3APM, 4APM, 5APM, 6APM) is subject to the total emission limit for that Paper Machine.

[40 CFR 52.21, 391-3-1-.02(2)(e)(subsumed)]

- 3.3.27 For Paper Machines 5APM and 6APM, the Permittee shall submit to the Division a CAM Plan for the respective control device, 5DE2 or 6DE2, within 90 days prior to commencement of operation of the respective modified paper machine.  
[40 CFR Part 64]
- 3.3.28 The Permittee shall submit to the Division a detailed construction schedule for each Paper Machine, 1APM through 6APM, for the entire Paper Machine PSD Project within 30 days upon commencement of PSD construction.  
[40 CFR 52.21(n)(1)(ii)]
- 3.3.29 The Permittee shall commence construction of the Paper Machine PSD Project described in Application No. 17646 within 18 months of the date of issuance of this Permit. Approval to construct shall become invalid if construction is not commenced by that date or if construction is discontinued for a period of 18 months or more unless an approval for an extension is granted by the Division in accordance with 40 CFR 52.21(r)(2). For the purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9).  
[40 CFR 52.21(r)(2)]

### 3.4 Equipment SIP Rule Standards

- 3.4.6 Except as provided in Condition 3.3.25, upon completion of the paper machine modification project, the Permittee shall not fire fuel in Paper Machine Burners 1AYD, 2AYD, 3AYD, 4AYD, 5APD and 6APD which contains more than 2.5 percent, by weight, sulfur.  
[391-3-1-.02(2)(g)2]

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- 3.4.7 Except as provided in Condition 3.3.25, upon completion of the paper machine modification project, the Permittee shall not fire fuel in Boilers B001 and B002 and Paper Machine Burners 1APD, 2APD, 3APD, 4APD, 5AYD and 6AYD which contains more than 3.0 percent, by weight, sulfur.  
[391-3-1-.02(2)(g)2]

**PART 4.0 REQUIREMENTS FOR TESTING****4.2 Specific Testing Requirements**

- 4.2.10 Within 60 days after achieving the maximum production rate at which the modified paper machine will be operated, but no later than 180 days after initial startup of each modified paper machine, the Permittee shall conduct performance tests for PM/PM<sub>10</sub> emissions from all of the Paper Machines 1APM through 6APM. The Permittee shall conduct PM emissions testing simultaneously on all exhaust stacks installed on each paper machine [Former, Process, Repulper, Predryer/Yankee Burner, Dry End and Roof Exhaust Stacks]. The Permittee shall only conduct testing on one Roof Exhaust Stack for each paper machine as determined by the methods to estimate emissions from Roof Exhaust Stacks in Condition 4.2.12. This testing is required to demonstrate compliance with the respective PM/PM<sub>10</sub> emission limit in Condition 3.3.26.  
[40 CFR 52.21]
- 4.2.11 Within 60 days after achieving the maximum production rate at which the modified paper machine will be operated, but no later than 180 days after initial startup of each modified paper machine, the Permittee shall conduct periodic performance testing for PM/PM<sub>10</sub> emissions from Paper Machines 1APM through 6APM in accordance with the schedule in Condition 4.2.1. The Permittee shall conduct the PM emission testing simultaneously on all exhaust stacks installed on a paper machine [Former, Process, Repulper, Predryer/Yankee Burner, Dry End, and Roof Exhaust Stacks]. The Permittee shall only conduct testing on one Roof Exhaust Stack for each paper machine as determined by the methods to estimate emissions from Roof Exhaust Stacks in Condition 4.2.12. This condition will satisfy the testing requirements for Condition 4.2.1.  
[391-3-1-.02(6)(b)1]
- 4.2.12 Within 60 days after achieving the maximum production rate at which the modified paper machine will be operated, but no later than 180 days after initial startup of each modified paper machine, the Permittee shall conduct performance tests for PM/PM<sub>10</sub> emissions from the Roof Exhaust Stacks on two paper machines. One paper machine tested shall be either 1APM or 2APM and the second paper machine tested shall be one of lines 3APM, 4APM, 5APM, or 6APM, unless otherwise specified in alternate test procedures approved by the Division. All Roof Exhaust Stacks on each paper machine shall be tested at the same time. The Permittee shall use the test results to develop procedures to represent emissions from all Roof Exhaust Stacks by testing a single Roof Exhaust Stack on a respective paper machine. The procedures to estimate emissions shall be used in accordance with Conditions 4.2.10 and 4.2.11.  
[391-3-1-.02(6)(b)1]
- 4.2.13 Within 60 days after achieving the maximum production rate at which Paper Machine Burner 1AYD, 2AYD, or 3AYD will be operate, but no later than 180 days after initial startup of the respective Paper Machine Burner, the Permittee shall conduct performance tests for CO emissions from the respective Paper Machine Burner to demonstrate compliance with the respective CO emission limit in Condition 3.3.21.  
[40 CFR 52.21]

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- 4.2.14 Within 60 days after achieving the maximum production rate at which Paper Machine Burner 1AYD, 2AYD, or 3AYD will be operate, but no later than 180 days after initial startup of the respective Paper Machine Burner, the Permittee shall conduct performance tests for NO<sub>x</sub> emissions from the respective Paper Machine Burner to demonstrate compliance with the respective NO<sub>x</sub> emission limit in Condition 3.3.21.  
[40 CFR 52.21]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.2 Specific Monitoring Requirements**

5.2.11 Upon completion of the paper machine modification project, the Permittee shall monitor emissions of nitrogen oxides from the Paper Machine Burner 1AYD using the following protocol:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Measurements of nitrogen oxides ( $\text{NO}_x$ ) and oxygen concentrations shall be conducted according to *ASTM D 6522 – Standard Test Method for Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable analyzers or the combination of Methods 7E and 3A to determine nitrogen oxides ( $\text{NO}_x$ ) and oxygen emissions*. The measurement period shall consist of one (1) test run thirty minutes in duration.
- b. Nitrogen oxides emissions (lb/hr) from the Paper Machine Burners shall be determined using the following equation:

$$E = K C_d F_d Q_{HI} \frac{20.9}{20.9 - O_2}$$

where

E = Nitrogen oxides emissions (lb/hr)

K = Conversion factor for nitrogen oxides,  $1.194 \times 10^{-7}$  ([lb/scf]/ppm)

$C_d$  = Concentration of nitrogen oxides (ppm by volume, dry basis)

$F_d$  = F-factor for natural gas or liquefied petroleum gas = 8710 (dscf/MMBtu;)

$Q_{HI}$  = Hourly heat input (MM Btu/hr)

$O_2$  = Exhaust Gas Oxygen Concentration (percent by volume, dry basis)

During the measurement period, the fuel for the unit being monitored shall be measured and recorded and used to determine the hourly heat input rate. For the purpose of this condition, the fuel meter used to measure the quantity of fuel supplied to the unit shall be calibrated according to the manufacturer's specifications.

- c. Following any measurement that is determined to be greater than the applicable  $\text{NO}_x$  emissions limit for an emission unit, the Permittee shall make adjustments to the emission unit and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows that the  $\text{NO}_x$  emissions are less than the applicable  $\text{NO}_x$  emissions limit.

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- d. Following the initial measurement required by this condition, the Permittee shall conduct measurements of nitrogen oxides (NO<sub>x</sub>) and oxygen concentrations at a frequency of one per calendar quarter (quarters ending March 31, June 30, September 30 and December 31). Measurements shall be conducted on a Paper Machine during any calendar quarter that the unit is operated for 168 hours or more on natural gas or LPG. Following any quarterly measurement determined to be greater than the applicable NO<sub>x</sub> emission limit for an emission unit, the Permittee shall make adjustments to the emission unit and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows that the monitoring NO<sub>x</sub> emission limit is less than the applicable NO<sub>x</sub> emission limit for the unit at which time quarterly measurements may be resumed.
- e. Records of nitrogen oxides monitoring shall be kept in a form suitable for inspection or submittal for a period of five (5) years. The record shall at a minimum contain the cause and corrective action for all excursions, and all measurements of concentration of nitrogen oxides and oxygen.
- 5.2.12 Upon completion of the paper machine modification project, the Permittee shall monitor emissions of carbon monoxide from Paper Machine Burner 1AYD using the following protocol:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Measurements of carbon monoxide (CO) and oxygen concentrations shall be conducted according to *ASTM D 6522 – Standard Test Method for Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable analyzers or the combination of Methods 10 and 3A to determine carbon monoxide (CO) and oxygen emissions*. The measurement period shall consist of one (1) test run thirty minutes in duration.
- b. Carbon monoxide emissions (lb/hr) from the Paper Machines shall be determined using the following equation:

$$E = K C_d F_d Q_{HI} \frac{20.9}{20.9 - O_2}$$

where,

E = Carbon monoxide emissions (lb/hr)

K = Conversion factor for carbon monoxide,  $7.263 \times 10^{-8}$  ([lb/scf]/ppm)

C<sub>d</sub> = Concentration of carbon monoxide (ppm by volume, dry basis)

F<sub>d</sub> = F-Factor for natural gas, LPG = 8710 (dscf/MMBtu)

Q<sub>HI</sub> = Hourly heat input (MMBtu/hr)

O<sub>2</sub> = Exhaust Gas Oxygen Concentration (percent by volume, dry basis)

During a test run, the fuel firing rate for the unit being tested shall be measured and recorded and used to determine the hourly heat input rate. For the purpose of this condition, the fuel flow meter used to measure the quantity of natural gas or LPG supplied to the unit shall be calibrated according to the manufacturer's specifications.

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- c. Following any measurement that is determined to be greater than the applicable CO emissions limit for an emission unit, the Permittee shall make adjustments to the unit and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows that the CO emissions are less than the applicable CO emissions limit.
- d. Following the initial measurement required by this condition, the Permittee shall conduct measurements of carbon monoxide and oxygen concentrations at a frequency of one per calendar quarter (quarters ending March 31, June 30, September 30 and December 31). Measurements shall be conducted on a paper machine during any calendar quarter that the unit is operated for 168 hours or more on natural gas or LPG. Following any quarterly measurement determined to be greater than the applicable CO emission limit for an emission unit, the Permittee shall make adjustments to the emission unit and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows that the monitoring CO emission limit is less than the applicable CO emission limit for the unit at which time quarterly measurements may be resumed.
- e. Records of carbon monoxide monitoring shall be kept in a form suitable for inspection or submittal for a period of five (5) years. The record shall at a minimum contain the cause and corrective action for all excursions, and all measurements of concentration of carbon monoxide and oxygen.

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
    - i. Any occurrence when Boilers B001, B002, B003 and Paper Machine Burners 1APD, 1AYD, 2APD, 2AYD, 3APD, 3AYD, 4APD, 4AYD, 5APD, 5AYD, 6APD and 6AYD burn fuel that is not indicated for the appropriate equipment in Table 3.2a.
    - ii. Any occurrence where fuel oil with the sulfur content greater than 0.34 percent by weight is burned in Boilers B001, B002, or in Paper Machine Burners 1APD, 2APD, 3APD, 4APD, 4AYD.
    - x. Any occurrence where any fuel other than natural gas or LPG is fired in Paper Machine Burners 1AYD, 2AYD, 3AYD.
  - c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
    - vi. Any measurement of Nitrogen Oxides emissions from a Paper Machine, conducted in accordance with the requirements of Conditions 5.2.3 and/or 5.2.11, which is greater than the applicable emission limitation contained in Conditions 3.3.7, 3.3.21 or 3.3.24.
    - viii. Any measurement of Carbon Monoxides emissions from a Paper Machine, conducted in accordance with the requirements of Conditions 5.2.4 and/or 5.2.12, which is greater than the applicable emission limitation contained in Conditions 3.3.7, 3.3.21 or 3.3.24.
  - d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
    - v. Any occurrence when good combustion practices are not followed to minimize NO<sub>x</sub> and CO emissions in accordance with Condition 3.3.23.



**6.2 Specific Record Keeping and Reporting Requirements**

- 6.2.16 The Permittee shall provide written notifications to the Division of the dates on which construction is commenced and completed for this paper machine modification project. Each notification shall be submitted in writing within 30 days of the date of record.

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.4 Insignificant Activities Associated with this Amendment**

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**7.6 Short-term Activities Associated with this Amendment**

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

**7.14 Specific Conditions**

7.14.3 Upon completion of this paper machine modification project, existing Conditions 3.3.5, 3.3.7, 3.3.10 and 3.4.4 in Permit Number 2676-095-0071-V-02-0 will no longer be applicable.

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### **Attachments**

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

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## List Of Standard Abbreviations

[illegible]


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### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	
<b>Combustion Equipment</b>	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	1
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	13
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators;	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
<b>Trade Operations</b>	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
<b>Maintenance, Cleaning, and Housekeeping</b>	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	13
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Laboratories and Testing</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	2
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
<b>Pollution Control</b>	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
<b>Industrial Operations</b>	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	44
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Storage Tanks and Equipment</b>	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	3
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	14
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	Variable
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	3

### INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
American Pulverizer WS-40 Wood Hog Unit	1
Blast-cleaning booths (not using suspension of abrasive in water) in Consumer Wraps and 5APM areas	2
Contractor Paved Parking Lot	1
Converting Area Air Washer Tissue East & West	12
Dry Adhesive Glue Silo - Material Handling	1
Employee Paved Parking Lots and Roads	1
Papermaking Roof Exhausters	24
Paved Road from Gate 3 to biomass fuel storage area	1
Tissue Wet Strength Storage Tank - 24,522 gallons	1
Towel Wet Strength Storage Tank - (2) 19,500 gallons at Location #2 (C&FP Tank Farm #1)	2
Trim Cyclone	1
Unpaved Road from Gate 3 to biomass fuel storage area	1
Utilites Corrosion Inhibitor Tank - 1000 gallons at Location E	1
Utilities Carbonic Acid Neutralizer Tank - 1000 gallons at Location E	1
Utilities Oxygen Inhibitor Tank - 1000 gallons at Location C	1
Utilities Oxygen Scavenger Tank - 1000 gallons at Location E	1
Utilities Scale Control Tank - 1000 gallons at Location C	1
Utilities Slimicide Tank - 500 gallons at Location C	1
Welding Stations - Tissue East	3
Woodyard - Wood Waste Storage Pile	1

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### ATTACHMENT B (continued)

#### GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	17
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0



**ATTACHMENT C**

**LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. ***Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.***
4. ***Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.***
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/ap42.html](http://www.epa.gov/ttn/chief/ap42.html).
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/tanks.html](http://www.epa.gov/ttn/chief/tanks.html).
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).