Part 70 Operating Permit Amendment

Permit Amendment No.: 2676-095-0071-V-02-1 Effective Date: March 22, 2010

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 Burner 1AYD, and to upgrade Yankee Burners 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.

[Signed]	
Director	
Environmental Protect	ction Division

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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_X), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀) and volatile organic compound (VOC) emissions from this modification project will exceed the respective PSD significant thresholds of pollutants NO_X, CO, SO₂, PM/PM₁₀ 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 Burner (Source Code: 1AYD) that will serve Paper Machine 1APM and the modification to upgrade two existing Yankee Burners (Source Codes: 2AYD, 3AYD) serving Paper Machines 2APM and 3APM. Yankee Burners 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.

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 Po	llution Control Devices
ID No.	Description	Applicable			Description
	-	Requirements/Standards	Conditions	ID No.	-
1APM	1A Paper Machine	40 CFR 52.21,	3.3.5, 3.3.8, 3.3.9,	1AVS	Venturi Scrubber
	(Former, 2 Process and 2	391-3-102(2)(b),	3.3.12, 3.3.13, 3.3.14,		
	Dry End stacks)	391-3-102(2)(e),	3.3.15, 3.3.16,		
		40 CFR 63, Subpart A,	3.3.21,3.3.26, 3.5.4,		
		40 CFR 63, Subpart JJJJ, 40 CFR 64	4.2.1, 4.2.6, 4.2.10,		
		40 CFK 04	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		
1APD	Predryer Burner for	40 CFR 52.21,	3.2.1, 3.3.8, 3.3.10,	None	None
1711 D	1APM	391-3-102(2)(g)	3.3.25, 3.4.4, 3.4.7,	TVOILE	None
	150 10 ⁶ Btu/hr burner	371 3 1 .02(2)(8)	4.2.2, 6.1.7, 6.2.2, 6.2.6,		
	130 To Blank barner		6.2.7		
1AYD	Yankee Burner for	40 CFR 52.21,	3.3.21, 3.3.22, 3.3.23,	None	None
	1APM	391-3-102(2)(g)	3.4.6, 3.5.4, 5.2.11,		
	95 10 ⁶ Btu/hr burner	=>=======	5.2.12		
2APM	2A Paper Machine	40 CFR 52.21,	3.3.5, 3.3.7, 3.3.8, 3.3.9,	2AVS	Venturi Scrubber
	(Former, 3 Process and 2	391-3-102(2)(b),	3.3.12, 3.3.13, 3.3.14,		
	Dry End stacks)	391-3-102(2)(e),	3.3.15, 3.3.16, 3.3.21,		
		40 CFR 63, Subpart A,	3.3.26, 3.5.4, 4.2.1,		
		40 CFR 63, Subpart JJJJ,	4.2.6, 4.2.10, 4.2.11,		
		40 CFR 64	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		
2APD	Predryer Burner for	40 CFR 52.21,	3.2.1, 3.3.8, 3.3.10,	None	None
	2APM c	391-3-102(2)(g)	3.3.25, 3.4.4, 3.4.7,		
	150 10 ⁶ Btu/hr burner		4.2.2, 6.1.7, 6.2.2, 6.2.6,		
		10 GTD 70 01	6.2.7		
2AYD	Yankee Burner for	40 CFR 52.21,	3.2.1, 3.3.7, 3.3.8,	None	None
	2APM	391-3-102(2)(g)	3.3.21, 3.3.22, 3.3.23,		
	95 10 ⁶ Btu/hr burner		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		
3APM	3A Paper Machine	40 CFR 52.21,	3.3.5, 3.3.7, 3.3.8, 3.3.9,	3AVS	Venturi Scrubber
JAPWI	(Former, 2 Process and 2	391-3-102(2)(b),	3.3.12, 3.3.13, 3.3.14,	JAVS	venturi scrubber
	Dry End stacks)	391-3-102(2)(e), 391-3-102(2)(e),	3.3.15, 3.3.16, 3.3.21,		
	Dry End stacks)	40 CFR 63, Subpart A,	3.3.26, 3.5.4, 4.2.1,		
		40 CFR 63, Subpart JJJJ,	4.2.6, 4.2.10, 4.2.11,		
		40 CFR 64	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		
3APD	Predryer Burner for	40 CFR 52.21,	3.2.1, 3.3.8, 3.3.10,	None	None
	3APM	391-3-102(2)(g)	3.3.25, 3.4.4, 3.4.7,		
	150 10 ⁶ Btu/hr burner	() ()	4.2.2, 6.1.7, 6.2.2, 6.2.6,		
			6.2.7		

3AYD	Yankee Burner for 3APM 95 10 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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,	None	None
4APM	4A Paper Machine (Former, Process and 2 Dry End stacks)	40 CFR 52.21, 391-3-102(2)(b), 391-3-102(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, 40 CFR 64	6.2.6, 6.2.7 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,	4 AVS	Venturi Scrubber
4APD	Predryer Burner for	40 CFR 52.21,	6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13 3.2.1, 3.3.8, 3.3.10,	None	None
	4APM 150 10 ⁶ Btu/hr burner	391-3-102(2)(g)	3.3.25, 3.4.4, 3.4.7, 4.2.2, 6.1.7, 6.2.2, 6.2.6, 6.2.7		
4AYD	Yankee Burner for 4APM 95 10 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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 3 Dry End stacks)	40 CFR 52.21, 391-3-102(2)(b), 391-3-102(2)(e), 40 CFR 63, Subpart A, 40 CFR 63, Subpart JJJJ, 40 CFR 64	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	Cyclonic Separator, Venturi Scrubber
5APD	Predryer Burner for 5APM 90 10 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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 3 Dry End Stacks)	40 CFR 52.21, 391-3-102(2)(b), 391-3-102(2)(e), 40 CFR 63 Subpart A, 40 CFR 63 Subpart JJJJ, 40 CFR 64	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	Cyclonic Separator, Venturi Scrubber
6APD	Predryer Burner for 6APM 90 10 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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 ⁶ Btu/hr burner	40 CFR 52.21, 391-3-102(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

B001	Boiler No. 1	40 CFR 52.21,	3.2.1, 3.3.10, 3.4.1,	None	None
	Steam Plant	391-3-102(2)(d),	3.4.2, 3.4.4, 3.4.7, 4.2.5,		
	187 10 ⁶ Btu/hr boiler	391-3-102(2)(g)	6.1.7, 6.2.2		
B002	Boiler No. 2	40 CFR 52.21,	3.2.1, 3.3.8, 3.3.10,	B002ESP	Wet Electrostatic
	Steam Plant	391-3-102(2)(d),	3.3.11, 3.3.17, 3.3.18,		Precipitator
	216 10 ⁶ Btu/hr boiler	391-3-102(2)(g),	3.3.19, 3.3.20, 3.3.21,		
		40 CFR 64	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		
B003	Boiler No. 3	40 CFR 60 Subpart Db,	3.2.1, 3.3.1, 3.3.2, 3.3.3,	None	None
	Steam Plant	40 CFR 52.21,	3.3.4, 3.3.8, 3.3.9, 3.4.1,		
	175 10 ⁶ Btu/hr boiler	391-3-102(2)(d),	3.4.2, 4.2.4, 4.2.5, 5.2.1,		
		391-3-102(2)(g)	5.2.2, 5.2.4, 6.1.7, 6.2.3,		
			6.2.6, 6.2.7, 6.2.15		
CONV	Converting and Paper	40 CFR 52.21,	3.3.9, 3.3.13, 3.3.14,	None	None
	Finishing Operations	391-3-102(2)(b),	3.3.15, 3.3.16, 3.4.3,		
		391-3-102(2)(e),	4.2.6, 6.1.7, 6.2.1, 6.2.6,		
		391-3-102(2)(mm),	6.2.7, 6.2.8, 6.2.9,		
		40 CFR 63 Subpart A,	6.2.10, 6.2.11, 6.2.12,		
		40 CFR 63 Subpart KK,	6.2.13		
		40 CFR 63 Subpart JJJJ			
X001	Dry Material Handling	40 CFR 52.21,	3.4.3, 6.1.7	X001FF	Fabric Filter
	System	391-3-102(2)(b),			
		391-3-102(2)(e)			

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

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.

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[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 ⁶ Btu/hr Boiler – Steam Plant	Gas/Oil
B002	216 10 ⁶ Btu/hr Boiler – Steam Plant	Wood Waste (Bark)/ Peanut Hull/Oil /Plastic/ Pecan Hull/Fines/Biomass Materials
B003	175 10 ⁶ Btu/hr Boiler – Steam Plant	Gas/LPG
1APM	150 10 ⁶ Btu/hr Predryer Burner (1APD)	Gas/LPG/Oil
IAFWI	95 10 ⁶ Btu/hr Yankee Burner (1AYD)	Gas/LPG
2APM	150 10 ⁶ Btu/hr Predryer Burner (2APD)	Gas/LPG/Oil
ZAFIVI	95 10 ⁶ Btu/hr Yankee Burner (2AYD)	Gas/LPG
3APM	150 10 ⁶ Btu/hr Predryer Burner (3APD)	Gas/LPG/Oil
SAFWI	95 10 ⁶ Btu/hr Yankee Burner (3AYD)	Gas/LPG
4APM	150 10 ⁶ Btu/hr Predryer Burner (4APD)	Gas/LPG/Oil
4APWI	95 10 ⁶ Btu/hr Yankee Burner (4AYD)	Gas/LPG/Oil
5APM	90 10 ⁶ Btu/hr Predryer Burner (5APD)	Gas/LPG
JAFIVI	110 10 ⁶ Btu/hr Yankee Burner (5AYD)	Gas/LPG
6APM	90 10 ⁶ Btu/hr Predryer Burner (6APD)	Gas/LPG
UAI WI	110 10 ⁶ Btu/hr Yankee Burner (6AYD)	Gas/LPG

^{*} Gas = Natural Gas Oil = Fuel Oil LPG = Liquefied Petroleum Gas

3.3 Equipment Federal Rule Standards

3.3.21 Upon completion of the paper machine modification project, the Permittee shall not discharge or cause the discharge into the atmosphere from Yankee Burners 1AYD, 2AYD, and 3AYD, any emissions, which contain nitrogen oxides and carbon monoxide in excess of the following:

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[BACT, 40 CFR 52.21]

Paper	Burner	Nitrogen Oxides	Carbon Monoxide
Machine Source Code		(lbs/hr)	(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 Yankee Burners 1AYD, 2AYD, and 3AYD. No fuel oil shall be combusted in Yankee 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_X burners in Yankee Burners 1AYD, 2AYD, and 3AYD along with good combustion and work practice measures to minimize NO_X 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]

	Burner Source	Nitrogen Oxides	Nitrogen Oxides	Carbon Monoxides	
Paper		(lbs/hr)	(lbs/hr)	(lbs/hr)	
Machine	Code	Natural Gas or	No. 2 Fuel Oil	Natural Gas, LPG or	
	Code	LPG	No. 2 Fuel Oil	No. 2 Fuel	
4APM	4AYD	13.0	16.3	19.5	
5APM	5APD	26.1**	*	39.2**	
JAPIVI	5AYD	20.1		39.2	
6APM	6APD	26.1**	*	39.2**	
OAPM	6AYD	20.1		39.2	

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)]

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 filterable PM/PM₁₀ in excess of the following when firing any fuel type allowed for both the Predryer and Yankee Burners.

Paper Machine	PM/PM ₁₀ (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, 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, within 90 days prior to commencement of operation of the respective modified paper machine, the Permittee shall submit to the Division a demonstration of compliance with the PSD increment concentration of 30 micrograms per cubic meter for PM₁₀ for the 24-hour averaging period. If the PSD increment consumption demonstration is based on a new control for the modified paper machine, a CAM Plan for the control device shall be submitted within 90 days prior to commencement of operation of the respective modified paper machine. [40 CFR 52.21 and 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]

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.

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[391-3-1-.02(2)(g)2]

PART 4.0 REQUIREMENTS FOR TESTING

4.2 Specific Testing Requirements

- 4.2.10 For Paper Machines 1APM through 6APM, the Permittee shall conduct initial performance tests for PM/PM₁₀ emissions from the modified paper machine to determine compliance with the respective PM/PM₁₀ emission limits in Condition 3.3.26. The performance testing on each modified paper machine shall be conducted 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 the modified paper machine. The Permittee shall conduct PM/PM₁₀ emissions testing simultaneously on all exhaust stacks installed on each paper machine [Former, Process, 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.
- 4.2.11 Following the performance testing required by Condition 4.2.10, the Permittee shall conduct periodic performance testing for PM/PM₁₀ emissions from Paper Machine 1APM through 6APM in accordance with the schedule in Condition 4.2.1. The Permittee shall conduct the PM/PM₁₀ emission testing simultaneously on all exhaust stacks installed on a paper machine [Former, Process, 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.

 [391-3-1-.02(6)(b)1]
- 4.2.12 The Permittee shall conduct performance tests for PM/PM₁₀ 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 line 3APM, 4APM, 5APM, or 6APM, unless otherwise specified in alternate test procedures approved by the Division. Each performance test must be conducted within 60 days after achieving the maximum production rate at which the chosen paper machine will be operated, but no later than 180 days after the initial startup of the chosen paper machine. 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 Yankee Burner 1AYD, 2AYD, or 3AYD will be operate, but no later than 180 days after initial startup of the respective Yankee Burner, the Permittee shall conduct performance tests for CO emissions from the respective Yankee Burner to demonstrate compliance with the respective CO emission limit in Condition 3.3.21.

 [40 CFR 52.21]

4.2.14 Within 60 days after achieving the maximum production rate at which Yankee Burner 1AYD, 2AYD, or 3AYD will be operate, but no later than 180 days after initial startup of the respective Yankee Burner, the Permittee shall conduct performance tests for NO_X emissions from the respective Yankee Burner to demonstrate compliance with the respective NO_X emission limit in Condition 3.3.21.

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[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 Yankee 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 (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 (NO_X) and oxygen emissions. The measurement period shall consist of one (1) test run thirty minutes in duration.

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b. Nitrogen oxides emissions (lb/hr) from the Yankee Burner 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, 1.194×10^{-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 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 NO_X emissions are less than the applicable NO_X emissions limit.

- d. Following the initial measurement required by this condition, the Permittee shall conduct measurements of nitrogen oxides (NO_X) 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_X 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_X emission limit is less than the applicable NO_X 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 Yankee 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 Yankee Burner 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, 7.263×10^{-8} ([lb/scf]/ppm)

 C_d = Concentration of carbon monoxide (ppm by volume, dry basis)

 F_d = F-Factor for natural gas, LPG = 8710 (dscf/MMBtu)

 Q_{HI} = Hourly heat input (MMBtu/hr)

 O_2 = 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.

- 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, 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 <u>Paper Machine Burners 1APD</u>, 2APD, 3APD, 4APD, 4AYD.
- x. Any occurrence where any fuel other than natural gas or LPG is fired in Yankee 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 <u>Conditions 5.2.3 and/or 5.2.11</u>, which is greater than the applicable emission limitation contained in <u>Conditions 3.3.7, 3.3.21, or 3.3.24</u>.
 - viii. Any measurement of Carbon Monoxides emissions from a Paper Machine, conducted in accordance with the requirements of <u>Conditions 5.2.4 and/or 5.2.12</u>, 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_X 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.

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

ATTACHMENT A

List Of Standard Abbreviations

AIDC	A C	
AIRS	Aerometric Information Retrieval System	
APCD	Air Pollution Control Device	
ASTM	American Society for Testing and Materials	
BACT	Best Available Control Technology	
BTU	British Thermal Unit	
CAAA	Clean Air Act Amendments	
CEM	Continuous Emission Monitor	
CERMS	Continuous Emission Rate Monitoring System	
CFR	Code of Federal Regulations	
CMS	Continuous Monitoring System(s)	
CO	Carbon Monoxide	
COM	Continuous Opacity Monitor	
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic	
	Meter	
EPA	United States Environmental Protection Agency	
EPCRA	Emergency Planning and Community Right to	
	Know Act	
gr	Grain(s)	
GPM (gpm)	Gallons per minute	
H ₂ O (H2O)	Water	
HAP	Hazardous Air Pollutant	
HCFC	Hydro-chloro-fluorocarbon	
MACT	Maximum Achievable Control Technology	
MMBtu	Million British Thermal Units	
MMBtu/hr	Million British Thermal Units per hour	
MVAC	Motor Vehicle Air Conditioner	
MW	Megawatt	
NESHAP	National Emission Standards for Hazardous Air	
	Pollutants	
$NO_{x}(NOx)$	Nitrogen Oxides	
NSPS	New Source Performance Standards	
OCGA	Official Code of Georgia Annotated	

PM	Particulate Matter		
PM_{10}	Particulate Matter less than 10 micrometers in		
(PM10)	diameter		
PPM (ppm)	Parts per Million		
PSD	Prevention of Significant Deterioration		
RACT	Reasonably Available Control Technology		
RMP	Risk Management Plan		
SIC	Standard Industrial Classification		
SIP	State Implementation Plan		
SO ₂ (SO2)	Sulfur Dioxide		
USC	United States Code		
VE	Visible Emissions		
VOC	Volatile Organic Compound		

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List of Permit Specific Abbreviations

None		

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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	Category Description of Insignificant Activity/Unit					
Mobile Sources	Cleaning and sweeping of streets and paved surfaces	Quantity				
11100110 5041 005	and the same of th					
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	2				
	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 391-3-103(10)(g)2.(ii) for descriptions of waste types)					
	3. Open burning in compliance with Georgia Rule 391-3-102 (5).					
	4. Stationary engines burning:					
	 Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators; 	13				
	 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.					
Trade Operations	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.					
Maintenance, Cleaning, and Housekeeping	Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.					
The second second	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

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Category	Category Description of Insignificant Activity/Unit			
Laboratories and Testing	esting physical or chemical analysis.			
S	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.			
Pollution Control	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.			
Industrial Operations	 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; &			
	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

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Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	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	
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
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.

	Number of Units (if appropriate)	Applicable Rules		
Description of Emissions Units / Activities		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.	23
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

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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.
- 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.
- 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).

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