Prevention of Significant Air Quality Deterioration Review
Georgia-Pacific Corporation dba Fort James Operating Company
Savannah River Mill
located in Rincon, Georgia (Effingham County)

FINAL DETERMINATION

SIP Permit Application No. 15491
Title V Permit Application No. 15491
June 2006

State of Georgia
Department of Natural Resources
Environmental Protection Division

Air Protection Branch

Heather M. Abrams – Chief, Air Protection Branch

Stationary Source Permitting Program

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BACKGROUND

On July 15, 2004, Fort James Operating Company, Inc. – Savannah River Mill submitted a retroactive PSD application for PM/PM_{10} and VOC emissions from the paper machines, pulp processing area, and the bleaching systems at the Mill. On January 25, 2005, the Mill submitted a combined PSD permit application for (1) the retroactive review presented in the July 2004 application and (2) a new PSD application for a Mill Process Improvement project for the paper machines.

On March 28, 2006, the Division issued a Preliminary Determination stating that the retroactive review and the modifications described in Application No. 15491 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the affected equipment.

The Division requested that the mill place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in the *Effingham Herald* (legal organ for Effingham County) on April 11, 2006. The public comment period expired on May 11, 2006.

During the comment period, comments were received from the facility. The EPD did not receive comments from the general public. U.S. Region 4 has stated that they have no comments on this permitting action.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

SAVANNAH RIVER MILL COMMENTS

Comments were received from Mary K. Hoffman, Senior Environmental Engineer, Savannah River Mill by email on May 9, 2006. A hard copy of the comments was received on May 10, 2006.

Comment 1 - Condition No. 3.1.1 Emission Units
In the emission units permit condition list, Condition 5.2.7 is not included for BO02 or BO03.

> **EPD Response:** Condition 5.2.7 is found in Air Quality Permit No. 2621-103-0007-V-02-0 and applies only to Source Code BO01. No changes have been made as a result of this comment.

Comment 2 – ID # CA15- Chlor-Alkali Plant
The Mill permanently shut down its Chlor-Alkali Plant (CA15) on January 10, 2006. The Chlor-Alkali Plant produced sodium hypochlorite, a bleaching agent used in Pulp Processing at the Mill. The Mill is now purchasing sodium hypochlorite from off-site sources.

There were two wet scrubbers in service at the Chlor-Alkali Plant. One of the wet scrubbers (SB-01), which controlled emissions from the Brine Dechlorinator (CA21), was permanently shut down with the Chlor-Alkali Plant. The second wet scrubber (SB-02), which controlled emissions from the Absorber/Hypochlorite Storage Tanks, is still in service controlling emissions from three sodium hypochlorite storage tanks; however, the absorber is no longer in use. The Mill is requesting GA EPD to eliminate the need for using SB-02 to control emissions from the three sodium hypochlorite storage tanks. The attached calculations, prepared by NCASI, indicate that the concentration of chlorine in the storage tanks is 135 ppb when the sodium hypochlorite solution has a pH value of 12. The actual pH value of the sodium hypochlorite solution is approximately 12.5, which means that the actual chlorine concentration in the headspace of the storage tanks is lower than the estimate of 135 ppb. Using EPA's TANKs computer model, and a chlorine concentration of 135 ppb, the estimated emission rate from all three storage tanks is insignificant, or approximately 9.2E-05 pounds per year (4.6E-08 tons per year). Based on these results, the Mill requests GA EPD to eliminate the need to control emissions from the sodium hypochlorite storage tanks.

> **EPD Response:** The Chlor-Alkali plant was used to make sodium hypochlorite solution for bleaching. The plant processed 28% sodium hydroxide and a sodium brine solution through an ion exchange electrolyzer to produce 30% sodium hydroxide, chlorine gas, hydrogen gas, and depleted brine. The depleted brine was then sent to a brine dechlorinator to remove residual chlorine gas. The facility was required to operate Scrubber SB01 to ensure that emissions of the residual chlorine were controlled. The dechlorinator is no longer operating.
>
> The second step of the sodium hypochlorite process involved mixing the chlorine gas from the electrolyzer with caustic from the brine dechlorinator in an absorber, or hyporeactor, to generate a 10% solution of sodium hypochlorite. During this step it was necessary to control residual, unreacted chlorine feed by operating Scrubber SB02. According to the facility, the sodium hypochlorite tanks were tied to the scrubber as a precautionary measure to control any residual chlorine emissions. The hyporeactor is no longer in operation.

The facility performed calculations to determine chlorine emissions from the purchased sodium hypochlorite. The EPD reviewed the calculations and is agreement with the results presented in the comment. Prior to being shutdown the plant had a potential to emit of 1.24 tpy of chlorine based on the maximum flow at the outlet of the scrubbers and the Toxic Guideline emission limits in parts per million. The emissions from the storage tanks are negligible and the shutdown of the dechlorinator and hyporeactor means that the facility no long processes chlorine gas. Based this information, it is not necessary for the facility to operate a scrubber for the purchased sodium hypochlorite storage tanks. All references to the plant have been removed from the permit. This includes removal of the plant from the equipment list and deletion of Conditions 3.5.1, 3.5.2, 4.1.3.m, 5.2.3, 6.1.7.c(v), and 6.1.7.c(vi). Draft Conditions 3.3.34 and 3.3.35 have not been included in the final permit. The three sodium hypochlorite tanks have been added to the Insignificant Activities list along with a fourth tank that is used in the wastewater treatment area.

Comment 3 – ID # SHS-Solid Fuel and Limestone Handling System
We do not believe that 40 CFR 60 Subpart OOO applies to the handling of limestone at the Mill. Our reasons for this are described below and were also described in an e-mail dated March 27, 2006 sent to Sandra Alvarado and Heather Cottrell at GA EPD.

Subpart OOO applies to certain listed equipment or processes ("affected facilities") located at nonmetallic mineral processing plants. 40 CFR 60.670(a)(1). A "nonmetallic mineral processing plant" is any combination of equipment "that is used to crush or grind" [**not**: "that **can be** used to crush or grind"] any nonmetallic mineral. 40 CFR 60.671. Limestone is a nonmetallic mineral, but our granulator (crusher) is not used to crush limestone at the Savannah River Mill.

The Mill transports coal and pet coke along a conveyor system that leads to a granulator, which reduces the size of the fuel. The granulated fuel is then sent to the boiler building for further processing and storage before it is fed into the three boilers.

The boilers use limestone injection to reduce sulfur dioxide emissions as required by 40 CFR Subparts D and Db. Limestone is stored onsite in a large pile and is conveyed through the same conveyor system that transports the fuel to the boiler building. The limestone is transported through the granulator since this is the only physical route to the storage silos. The granulator was purchased to reduce the size of the solid fuel (petcoke, coal) burned in the boilers, not to reduce the size of the limestone. As required by our supply contracts, the limestone purchased by the Mill already meets a specification requiring the size of the material to be less than 3/8" in size when it arrives at the mill. Therefore, the granulator is not needed to reduce the size of the limestone and does not in fact do so, because the granulator is only designed to reduce the size of coal and pet coke to ½".

While the Mill cannot guarantee that some of the limestone will not be impacted by the hammers inside of the granulator, resulting in a small amount of limestone being reduced in size, we do not believe the granulator meets the definition of a crusher under the Subpart OOO rules since it is not used or intended to be used to crush the limestone. The sole purpose of the granulator is to reduce the size of coal and pet coke. For this reason, we believe the granulator is not an affected facility under the Subpart OOO rules.

We request that the EPD make a final determination of whether Subpart OOO applies to our facility before the permit is finalized or the Mill makes any further commitments regarding its compliance strategy. We believe sufficient information has been provided above to make this determination, but would be willing to provide additional information or discuss the issue further if the Department believes it would be useful.

EPD Response: This comment was discussed with Richard McDonald, Manager of the Minerals Unit of the Stationary Source Permitting Program. Mr. McDonald stated that the facility is subject to the provisions of 40 CFR 60 Subpart OOO because the facility cannot guarantee that limestone will not be crushed in the granulator. Several changes have been made to the amendment as a result of this comment. First, the Subpart OOO language previously found in draft Conditions 3.3.32 and 3.3.33 have been replaced with language taken directly from the subpart. Second, the equipment list has been updated to include reference to Subpart OOO for the limestone silos. Finally, a condition has been added to Section 4.0 of the amendment requiring the facility to conduct the necessary particulate matter and opacity performance test for the subject equipment.

The Savannah River Mill may elect to modify the processing line so that limestone will not pass through the granulator. 40 CFR 60 Subpart OOO defines a nonmetallic mineral processing plant as "any combination of equipment that is used to crush or grind any nonmetallic mineral wherever located." Therefore, the facility is not subject to any section of the subpart if limestone is not crushed or ground. Condition 7.3.5 has been added to the permit so the conditions pertaining to 40 CFR 60 Subpart OOO become void after the installation of a limestone/granulator bypass.

Comment 4 – Condition No. 3.3.9
For clarification we would like to add (3 hour average) in parentheses in 3.3.9a.

EPD Response: The language is not necessary because the averaging period is defined by the applicable subpart. No changes have been made as a result of this comment.

Comment 5 – Condition No. 3.3.23
Please revise this condition to eliminate the need to install low NO_x burners on Paper Machine Nos. 17 and 18 within 60 days of the effective date of the Title V Permit. The requirement to install low-NO_x burners should not be required until the project to upgrade the paper machine dryer hood(s) is actually implemented.

EPD Response: The facility is correct that low-NO_X burners are only required if the facility proceeds with the dryer hood modifications. Condition 3.3.23 has been modified to remove the 60 day requirement and include the phrases "in conjunction with the dryer hood modifications proposed in Application No. 15491" and "Following the installation of the low NO_X burners."

Comment 6 – Condition No. 3.3.29
Regarding the applicability of NSPS Subpart Y, "Standards of Performance for Coal Preparation Plants" to the Mill's operations, in the May 2005 Title V Permit Revision, we indicated that the Subpart Y rules are "APPLICABLE" in Section C1 of the Revision. The Mill operates coal processing (such as the granulator) and conveying equipment, coal storage systems (such as the coal/pet coke silos) plus thermal dryers (for the No. 4 Boiler only) as defined under the Subpart Y rules. However, the Mill does not process more than 200 tons of coal per day. The normal amount of coal that the Mill processes is approximately 100 tons per day. The Mill has always believed that this fact, combined with the fact that the Mill's boilers were designed and have operated to burn pet coke as the primary fuel, excluded it from Subpart Y, as the rule only applies to affected facilities at coal preparation plants "which process more than 181 Mg (200 tons) per day." 40 CFR 60.250(a). If, on the other hand, the rule applies to any coal preparation plant with the **capacity** to process more than 200 tons/day of coal, then the rule would apply to our facility. We recently discovered a 1985 EPA Region 5 letter that uses the "capacity to process" language but it is not clear that this wording choice was intentional. It is due to this letter, however, that we listed the Subpart Y rules as applicable in the May 2005 Title V Permit Revision.

In response to an information request (regarding the May 2005 Title V Permit Revision) from Heather Cottrell of GA EPD, dated August 15, 2005, we informed EPD that the Mill was in compliance with the Subpart Y rules. As it turns out, this may have been an incorrect statement because we have not been able to locate any records confirming that the Mill ever conducted an initial performance test on the thermal dryers for the No. 4 Boiler as would have been required by 40 CFR 60.252. The Mill has been performing the continuous temperature monitoring of the gas stream at the exit of the thermal dryers for the No. 4 Boiler as required by 40 CFR 60.253(a)(1) since the boiler started-up. Moreover, emissions from the thermal dryers have always been controlled by baghouses, so we believe they have always been controlled within the particulate standards of Subpart Y.

It bears repeating that the thermal dryer rules apply only to thermal dryers used for bituminous coal. While the No. 4 Boiler did burn coal for several months immediately after it started up, the boiler started burning pet coke in September 1991. Some amount of coal was fired with pet coke until 1995 when the Boiler began firing 100% pet coke. Except for a few days in 2004, the No. 4 Boiler has normally burned 100% pet coke since that time and continues to burn 100% pet coke today.

The January 15, 1976, preamble to the Subpart Y rule confirms that, while Subpart Y generally applies to the processing of all types of coal, the thermal dryer standard does not. In the proposed rule, the thermal dryer standards were written to apply to any coal processing. But in the final rule, EPA reconsidered its decision and limited the applicability of the thermal dryer standard to bituminous coal: "At the time the regulation was proposed, EPA considered the parameters relating to the control of emissions from thermal dryers to be sufficiently similar, whether bituminous or non-bituminous coal was being dried. Since the time of proposal, EPA has reconsidered the application of standards to the thermal drying of non-bituminous coal. It has concluded that such application is not prudent in the absence of specific data demonstrating the similarity of the drying characteristics and emission control characteristics to those of bituminous coal. Since the majority of the EPA test data and other information used to develop the standards are based upon bituminous coal processing, the particulate matter standards for thermal dryers and pneumatic coal cleaning equipment have been revised to apply only to those facilities processing bituminous coal."
The important thing is that EPA distinguished between specific types of coal, and decided the dryer standard should only apply to one type. If EPA believed that non-bituminous coal should not be subject to

the standard, then we think it is reasonable to conclude that a fuel such as petcoke, which has different characteristics than bituminous coal (or any other type of coal), should also not be subject to the standard.

What this suggests to us is that the thermal dryer standards should not apply on a continuing basis unless or until the thermal dryers are processing bituminous coal. As stated above, the No. 4 Boiler has not processed coal since 1995 (except for a few days in 2004) and the Mill has no plans to combust coal in this boiler in the future (although we don't want to rule out that possibility permanently).

The Mill proposes three operating scenarios regarding the Subpart Y rules:

Operating Scenario No. 1
Under this scenario, which reflects the Mill's intended operations and the Mill's actual past operations for more than ten years, the Mill does not process more than 200 tons per day of coal on-site, and the Subpart Y rules do not apply to its operations. Records documenting this fact are and will continue to be maintained on a daily basis.

Operating Scenario No. 2
Under this scenario, if the Mill ever processes more than 200 tons per day of coal on-site for more than 24 hours, the Subpart Y rules will become applicable for our coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal. On these days, the Mill will comply with all aspects of the Subpart Y rules that apply to its coal handling operations.

Operating Scenario No. 3
If the Mill processes more than 200 tons per day of coal and feeds bituminous coal into Boiler 4 (BO02) thereby drying bituminous coal with the thermal dryers, we will measure the temperature of the gas stream exiting the thermal dryers on a continuous basis and meet the calibration requirements. Within 90 days of the first day that the mill process more than 200 tons per day of coal and feeds bituminous coal in to Boiler 4, we will also conduct a performance test on the thermal dryers to demonstrate compliance with the particulate matter standard of 0.031 grains/dscf. (40 CFR 60.252(a)(1)).

EPD Response: The EPD agrees with the operating scenarios proposed by the facility. A number of changes have been made to the amendment to include the alternative operating scenarios. Conditions 3.2.2, 3.2.3, 5.2.2.c, and 6.2.17 have been added to the permit. The 40 CFR 60 Subpart Y requirements that were previously found in Conditions 3.3.29 through 3.3.31 of the draft amendment have been moved to Section 7.3 of the permit. Additional testing and monitoring requirements have also been added to Section 7.3. The facility must comply with the general opacity provisions of 40 CFR 60 Subpart Y if coal processing equals or exceeds 200 tpd. Additionally, if coal processing triggers Subpart Y and the facility burns bituminous coal in Bubbling Fluidized Bed Boiler #4 the facility must comply with the thermal dryer monitoring, record keeping, and reporting requirements of the subpart. Boiler #4 is the only boiler equipped with thermal dryers.

Comment 7 – Condition Nos. 3.3.34, 3.3.35, and 5.2.3
Please delete these conditions as the Chlor-Alkali Plant has been permanently shut down. Additionally, as stated under Condition No. 3.1.1 above, there is no need for a chlorine scrubber for the sodium hypochlorite storage tanks.

EPD Response: Please see the response to Comment 2.

Comment 8 – Condition No 5.2.8.a
Please change the data recording frequency for paper machine production from "once per day" to "once per month". Since this requirement is necessary to assure that there is no exceedance of particulate matter emissions on a 12-month rolling average, it should only be necessary to record paper machine production on a monthly basis.

EPD Response: After discussions with the facility, it was determined that paper machine production is recorded on a daily basis and the facility will continue the practice in order to determine the total monthly production. No changes will be made as a result of this comment.

Comment 9 – Condition No 5.2.8.c
The exhaust from the wet venturi scrubber on Paper Machine 19 (SCRUB-4) and one of the wet venturi scrubbers on Paper Machine 20 (SCRUB-5) are directed inside of their respective paper machine buildings, and not to the atmosphere. For this reason, the Mill requests that the requirement to monitor scrubbant flow rate and pressure drop for these two scrubbers, once per operating shift, be removed unless and until the Mill decides, under an alternate operating scenario, to redirect the exhaust to the atmosphere. If the Mill ever decides to redirect the exhaust from either of these two scrubbers to the atmosphere, it will notify the EPD within seven (7) days.

The exhaust from the second wet venturi scrubber on Paper Machine 20 (SCRUB-3) is directed to the atmosphere from induced air flow through a fan. If the fan is not operating, any remaining natural air flow through this system is insignificant. We would like to comply with the requirement to monitor the scrubbant flow rate and pressure drop once per operating shift only if the fan is operating.

EPD Response: Generally, the EPD does not require monitoring for control devices that vent inside of a process building. However, the EPD believes that monitoring is necessary for the operation of SCRUB-4 and SCRUB-5 because the operation of the scrubbers impact other process vents.

The provisions of 40 CFR 52.21 required the EPD to conduct an ambient air quality review for particulate matter emission sources at the mill. The emission rates used in the modeling assumed that the scrubbers control a significant portion of the fugitive particulate matter emissions, resulting in a reduction in particulate matter exiting the numerous paper machine room vents. Therefore, if the scrubbers are not operated properly, emissions from the room vents may exceed the rates used to determine compliance with the NAAQS and PSD Increment. As a result, the EPD will require monitoring for these scrubbers. Condition 5.2.8.c has been modified to all the facility 90 days to install the appropriate monitoring equipment.

After discussions with the facility, it has been determined that it is not necessary make changes to the monitoring requirements for SCRUB-3. The facility has stated that the fan will not operate when the paper machine is down, when the scrubber is down for maintenance, or when a malfunction occurs. These are situations during which it could be expected that operating parameters could be zero or out of the normal operating range. The permit already contains provisions for monitor downtime, malfunctions, and excursions and there would be no need to operate the control device if the process it controls is down. Therefore, it is not necessary to include the language concerning the operational status of the fan.

Comment 10 – Condition No 5.2.8.d

Please change the last sentence of this permit condition to "once per operating day". The list of equipment in this permit condition does not always operate every day of the year, so the type and quantity of fuel burned should only need to be recorded on the days that the equipment is actually in operation.

EPD Response: After discussions with the facility, it was determined that no changes are necessary for this condition. It is important that SSCP be able to differentiate been non-operating days and missing records. The facility will make a distinction between operation and non-operating days for each fuel burning unit as part of the record keeping program.

Comment 11 – Condition No 5.2.9

Please change the requirement for the four NO_x CEMs to comply with 40 CFR 75 to 40 CFR 60. The plant is no longer covered by the NO_x SIP Call rules (see Federal Register Volume 70, No. 168, 51591-51597, dated August 31, 2005), and therefore, should not have to comply with the NO_x monitoring requirements under 40 CFR 75.

EPD Response: The change has been made as requested.

Comment 12 – Condition No. 5.2.11.a.

There is a typo in the second sentence "The may" should be "These may"? In regards to the timer and valves, we would like to spot check them on a weekly basis i.e. compartments 1 and 2 one week, 3 and 4 the next. We conduct a complete detailed check of our timer and valves on a monthly basis to include placing paper in each of the valves and allowing a complete cycle to observe that each paper blows out of the valve. We also monitor the differential pressure of the bag houses through our DCS system. If we see any issue, we can conduct the detailed complete check at that time. We have operated our bag houses successfully using this system. The monthly check is a very time consuming process. If we have to change it to a weekly activity, it will negatively impact the time management and efficiency of our maintenance personnel. Will the activities described above sufficiently satisfy the condition requirements?

EPD Response: The typographical error noted by the commenter has been changed from "the may" to "this may." It should be noted that the condition states that the program "may" include certain equipment checks, not "must" include certain equipment checks. The EPD recognizes that baghouse maintenance and inspection practices may vary from source to source. While the facility must conduct some level of operation and maintenance review on a weekly basis, the facility may elect to make the monthly detailed check as a part of the program. No changes will be made as a result of this comment.

Comment 13 – Condition 5.3.6.b

Please change the wording to clarify the grouping of the waste heat boilers with the combustion turbines.

"during the reporting period for the combustion turbine and waste heat boiler combinations (CT01 & WH01 or CT02 & WH02), ending with the last 24-hour period; that exceeds 105.0 pounds per hour…"

EPD Response: The wording has been clarified to properly reflect the equipment combinations.

Comment 14 – Condition No 6.1.7.c. v. and vi
Please delete these conditions as the Chlor-Alkali Plant has been permanently shut down. Additionally, as stated under Condition No. 3.1.1 above, the Mill has requested EPD to eliminate the need for a chlorine scrubber to control emissions from the three sodium hypochlorite storage tanks.

EPD Response: Please see the response to Comment 2.

Comment 15 – Condition No 6.1.7.c.x
As explained above for Condition No. 5.2.8.c, no monitoring should be required for SCRUB-4 and SCRUB-5 as long as these units do not exhaust to the atmosphere. In the future, if the Mill ever decides to redirect the exhaust gases from either of these two scrubbers to the atmosphere, it will notify the EPD within seven (7) days. This permit condition should be revised to reflect these different operating scenarios.

As explained above for Condition No. 5.2.8.c, the second wet venturi scrubber on Paper Machine 20 (SCRUB-3) is directed to the atmosphere from induced air flow through a fan. We would like to comply with the requirement to monitor the scrubbant flow rate and pressure drop once per operating shift only if the fan is operating.

EPD Response: Please see the response to Comment 9.

Comment 16 – Condition No 6.1.7.d. i
The last sentence includes the phrase, "represents all of the fuel oil combusted at the mill during the quarter." We would like to change the sentence to read "represents all of the fuel oil combusted in the Boilers, Combustion Turbines and Waste Heat Boilers (BO01, BO02, BO03, CT01, CT02, WH01 and WH02).

EPD Response: The condition has been changed to list the boilers, combustion turbines, and waste heat boilers.

Comment 17 – Condition No 6.2.14
Please revise the wording of the following excerpt from this condition as shown below:
Revise the wording "The Permittee shall review any new material that is proposed for use and ensure that the material being proposed has an equal or lower VOC content that the material it is replacing. If the material being proposed is new and has never been used before, then the Permittee will work with the material supplier to assure that the material being used has a low VOC content. The Permittee shall report chemical additive, cleaning solvent, or other VOC containing material changes with the quarterly report required by Condition 6.1.4. The report shall contain a certification, signed by a responsible official, stating that the protocol was followed" as follows:
"The Permittee shall review any new material that is proposed for use in the Mill and work with the material supplier in an attempt to use a material with an equal or lower VOC content than the material being replaced taking into consideration the effectiveness of the chemical, efficiency in the process and

economic feasibility. If the material being proposed is new and has never been used before, then the Permittee will work with the material supplier to assure that the material being used has as low a VOC content as possible, yet can still perform the required function efficiently and cost effectively.

The Permittee shall maintain records of all chemical additives, cleaning solvents, or other VOC containing material changes made at the Mill. The records will contain the VOC content of the new material and the material that was replaced, if any. The Permittee shall certify, as part of its Annual Title V Certification, that the New Substance Review Program protocol was followed for all changes of VOC-containing materials made at the Mill. In no case, shall the 12-month rolling average VOC emissions from the paper machines, bleaching systems, and pulp processing area, exceed their respective BACT limits identified in Condition No. 3.3.16."

Reference to the Converting Department was eliminated in the last sentence of the above paragraph because the Mill decided not to perform any modifications to the Napkin Printer (in the Converting Department), and for this reason, the BACT analysis for VOCs from the Napkin Printer is no longer required as part of the PSD Application. This information was transmitted to Heather Cottrell of the GA EPD in an e-mail dated August 18, 2005 (see response to Question No. 11).

Justification for the requested revisions for this Title V Permit Condition is explained below:

One of the purposes of the Mill's New Substance Review Program is to reduce the VOC content of new, incoming chemicals, if there is a substitute chemical with a lower VOC content that will perform the same function as the one it replaces, and if the substitute chemical does not have a significantly higher unit cost. The purpose of using the New Substance Review Program is not meant to establish VOC permit limits, which the Mill views as an independent activity. The Mill views the use of the New Substance Review Program as a pollution prevention activity, and through its use, the Mill has been able to significantly reduce VOC emissions over the past several years.

> **EPD Response:** The EPD agrees with the language proposed by the facility and Condition 6.2.14 has been modified as requested. The VOC emissions from the use of chemical additives and solvent usage for the paper machines, pulp processing area, and bleaching systems are restricted by the BACT limit in Condition 3.3.16. The EPD agrees that effectiveness, efficiency, and economic feasibility should be considered as a part of the New Substance Review Program. Also, reference to the converting department has been removed from the condition and reference to 40 CFR 52.21 for the converting department has been removed from the equipment list.

Comment 18 – Condition No 6.2.17

We understand that the Mill's Title V Permit is currently undergoing review by the GA EPD and all references to the requirements for 40 CFR 63 Subpart JJJJ, "National Emission Standards for Paper and Other Web Surface Coating Operations" will be incorporated into the renewed Title V Permit. For this reason, this specific condition can be eliminated as part of this PSD Construction permit.

EPD Response: The facility's Title V renewal application was received on March 29, 2006 and will be used to incorporate the provisions of Subpart JJJJ. It is not necessary for the facility to submit a separate application; therefore, the condition has not been included in the final amendment.

Comment 19 – Boiler No. 4
For Condition Nos. 3.3.4, 3.3.8, 3.3.10, 3.3.12, 4.2.2, 5.2.6, 5.2.8.d, 5.3.1, 5.3.5, 6.1.7.a.i, 6.1.7.b.i, 6.1.7.b.xi, 6.2.3, Fluidized Bed Boiler No. 4 should be described as a "Bubbling" fluidized bed boiler.

EPD Response: The changes have been made as requested. The change has also been made to the boiler description in the equipment list.

Comment 20 – Flexographic Printer #4
The Mill desires to place Flexographic Printer # 4 (FX04) back in service. The Mill notified EPD that it permanently removed this unit from service in a letter dated July 25, 2002 addressed to Ms. Wendy Troemel of EPD. The printer was placed into an onsite storage area at the facility. The Mill has an opportunity to utilize this printer to create a raw material that we previously purchased, thereby generating cost savings for the facility.

EPD Response: The draft language that removed Flexographic Printer #4 (Source Code FX04) from the permit has not been included in the final permit. The facility will continue to comply with the flexographic printer conditions as specified in Air Quality Permit No. 2621-103-0007-V-02-0. The conditions that will no longer be modified by this amendment include 3.3.6, 3.3.15, 6.1.7.b(vi), and 6.2.12.

EPD CHANGES

Some conditions in the amendment have been renumbered in order to accommodate the changes described above. The condition numbers specified in the equipment list have been updated as necessary.

Condition 5.2.10 has been modified to list all baghouses other than the boiler baghouses. The boilers are equipped with COMS; therefore, a VE check is not necessary.

Condition 6.2.10 has been modified to include two separate equations for calculating VOC emissions because there are two separate limits for the paper machines and the pulp processing / bleaching systems. The previous permit contained only one limit and required one calculation.

A citation has been added to Condition 6.1.7.b(xiv).

A typographical error has been corrected in Condition 5.3.6.b. The value 105.00 has been changed to 105.0.

APPENDIX A

AIR QUALITY PERMIT

2621-103-0007-V-02-1

APPENDIX B

WRITTEN COMMENTS
RECEIVED DURING
COMMENT PERIOD