



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

**Facility Name:** International Paper Company  
**Facility Address:** 6792 Marbut Road  
Lithonia, Georgia 30058 DeKalb County  
**Mailing Address:** 6792 Marbut Road  
Lithonia, Georgia 30058 DeKalb County  
**Facility AIRS Number:** 04-13-089-00074

is issued a Permit for the following:

**Operation of a corrugated containerboard manufacturing facility. Removal of the 5194 Langston Flexographic Folder-Gluer (FFG) Machine (ID No. P9); construction and operation of an EVOL 100 FFG (ID No. P11) machine; and incorporation of recent permit-exempt changes into the permit. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.**

This Permit 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.

This Permit 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. **29152** dated **January 16, 2024**; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **14** pages.



DRAFT

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Jeffrey W. Cown, Director  
Environmental Protection Division

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 1 of 14**

**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall not discharge or cause the discharge from all sources at the facility, volatile organic compounds (VOCs) in an amount exceeding 25.0 tons during any consecutive twelve-month period.  
[Avoidance of Georgia Rules 391-3-1-.02(2)(mm), (tt) & (ccc); Avoidance of Title V]
- 2.2 The Permittee shall not discharge or cause the discharge from the facility into the atmosphere any single hazardous air pollutant in an amount equal to or exceeding 10.0 tons during any consecutive twelve-month period or any combination of such listed pollutants in an amount equal to or exceeding 25.0 tons during any consecutive twelve-month period.  
[Avoidance of Title V; Area Source Classification per 40 CFR 63]

State of Georgia  
Department of Natural Resources  
Environmental Protection Division

Permit No.  
2653-089-0074-S-04-0

Page 2 of 14

**Georgia Rule (b)**

- 2.3 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the facility (except Boiler B1), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.  
[391-3-1-.02(2)(b)1.]

**Georgia Rule (d)**

- 2.4 The Permittee shall not cause, let, suffer, permit, or allow any emissions from the boiler with ID No. B1 which:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from  $P = 0.5(10/R)^{0.5}$  where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU.  
[391-3-1-.02(2)(d)2.(ii)]
  - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.  
[391-3-1-.02(2)(d)3.]

**Georgia Rule (e)**

- 2.5 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1.]
- a. For equipment in operation or extensively altered after July 2, 1968:
    - i.  $E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour;
    - ii.  $E = 55P^{0.11} - 40$ , for process input weight rate in excess of 30 tons per hour.
  - b. For equipment in operation or under construction contract on or before July 2, 1968:  
 $E = 4.1P^{0.67}$

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

**Georgia Rule (g)**

- 2.6 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in fuel-burning sources, unless otherwise specified by the Director.  
[391-3-1-.02(2)(g)2.]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 3 of 14**

***Georgia Rule (ff)***

2.7 The Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser (ID No. PW1) unless the following requirements for control of emissions of the volatile organic compounds are satisfied:  
[391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent the escape of volatile organic compounds during periods of non-use;
- b. The degreaser shall be equipped with a facility for draining cleaned parts before removal;
- c. If used, the solvent spray must be a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause excessive splashing;
- d. If the solvent volatility is 0.60 psi or greater measured at 100°F, or if the solvent is heated above 120°F, then one of the following control devices must be used:
  - i. Freeboard that gives a freeboard ratio of 0.7 or greater;
  - ii. Water cover (solvent must be insoluble in and heavier than water);
  - iii. Other systems of equivalent control, such as a refrigerated chiller or carbon adsorption.
- e. Waste solvent shall be stored only in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

***Georgia Rule (III)***

2.8 The Permittee shall not cause, let, suffer, permit, or allow emissions of NO<sub>x</sub>, from the boiler with ID No. B1, exceeding 30 ppm at 3 percent O<sub>2</sub>, dry basis during the period May 1 through September 30 of each year.  
[391-3-1-.02(2)(III)1. and 2.]

***NSPS Dc***

2.9 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units," for operation of the boiler with ID No. B1.  
[40 CFR Subpart A and Subpart Dc]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 4 of 14**

- 2.10 The Permittee shall not combust distillate fuel oil in the boiler with ID No. B1 that contains greater than 0.5 weight percent sulfur. Distillate fuel oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396, "Standard Specification for Fuel Oils." The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction.  
[40 CFR 60.41c, 40 CFR 60.42c(d), 40 CFR 60.42c(i), and 391-3-1-.02(2)(g)-subsumed]

***Avoidance of 40 CFR 63 Subpart JJJJJ***

- 2.11 The Permittee shall not fire any fuel other than natural gas and distillate fuel oil in the boiler with ID No. B1. Also, the Permittee shall not fire distillate fuel oil in said boiler unless during periods of *natural gas curtailment*, *gas supply emergencies*, or *periodic testing* on liquid fuel (Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year).  
[391-3-1-.03(2)(c) and Avoidance of 40 CFR 63 Subpart JJJJJ]

**3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

**4. Process & Control Equipment**

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division and shall be maintained for a period of 5 years from the date of entry.  
[391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]
- 4.2 The Permittee shall maintain an inventory of filter bags such that an adequate supply of bags is on hand to replace any defective bags in the baghouses.  
[391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]

**5. Monitoring**

- 5.1 The Permittee shall, each calendar year, monitor emissions of nitrogen oxides (NO<sub>x</sub>) from the boiler with ID No. B1, unless the boiler will not operate during the ozone season (May 1 through September 30 of each year) by performing a tune-up for each boiler to demonstrate compliance with the NO<sub>x</sub> concentration limit of Condition 2.8 using the following procedures:  
[391-3-1-.02(6)(b)1 and PTM Section 2.119]
- a. The tune-up shall be performed no earlier than March 1 and no later than May 1 of each calendar year. In the case of initial startups that occur after May 1 but before September 30, tune-ups shall be performed no later than 120 hours after startup. The tune-up shall be performed at the normal maximum operating load expected during the period from May 1 to September 30 of each year.

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 5 of 14**

- b. The tune-up shall be performed by using the manufacturer recommended settings for reduced NO<sub>x</sub> emissions or by using a NO<sub>x</sub> analyzer. Adjustments shall be made, as needed, so that NO<sub>x</sub> emissions are reduced in a manner consistent with good combustion practices and safe fuel-burning equipment operation.
- c. Following the adjustments, or determination that adjustments are not required, the Permittee shall perform a measurement consisting of a minimum of three test runs to demonstrate that the average emissions are less than or equal to the NO<sub>x</sub> concentration limit of Condition 2.8. Each test run shall be a minimum of 30 minutes of operational data in length. Following any test run which results in an average NO<sub>x</sub> concentration that exceeds the NO<sub>x</sub> limit of Condition 2.8, the Permittee shall make adjustments to the boiler and conduct a new set of test runs within one day. Subsequent adjustments followed by test runs shall be continued until the average of 3 consecutive test runs do not exceed the NO<sub>x</sub> concentration limit of Condition 2.8.
- d. All measurements of NO<sub>x</sub> and oxygen concentrations in paragraphs b. and c. of this condition shall be conducted using procedures of the American Society for Testing and Materials (ASTM) Standard Test Method for Determination of NO<sub>x</sub>, Carbon Monoxide (CO), and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable Analyzers, ASTM D 6522; procedures of Gas Research Institute Method GRI-96/0008, EPA/EMC Conditional Test Method (CTM-30) Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers; or procedures of EPA Reference Method 7E and 3A.
- e. The Permittee shall maintain records of all tune-ups performed in accordance with this condition. These records shall include the following:
  - i. date and time the tune-up was performed
  - ii. the boiler settings for each test run
  - iii. the average NO<sub>x</sub> concentration (in ppm at 3 percent O<sub>2</sub>, dry basis) for each test run
  - iv. what operating parameters were adjusted to minimize NO<sub>x</sub> emissions
  - v. an explanation of how the final (compliant) settings were determined
- f. Following the tune-up, from the period May 1 through September 30 of each year, the Permittee shall operate each affected boiler using the settings determined during the annual tune-up. If no parameters can be monitored to indicate the performance of a specific boiler, the Permittee shall certify that no adjustments have been made to the boiler by the Permittee and/or any third party since the most recent successful tune-up was completed. This certification shall be made in writing no later than October 15 of each year and shall be maintained with the records required by paragraph e. of this condition.

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 6 of 14**

- g. If a boiler is capable of operating for 3 consecutive test runs with average NO<sub>x</sub> concentrations of less than or equal to 15 ppm corrected to 3 percent oxygen, the Permittee may conduct the next subsequent tune-up in the fourth calendar year following the demonstration of 15 ppm or less. Results of measurements of NO<sub>x</sub> and oxygen concentrations and tune-ups, maintenance and records, and subsequent boiler operation shall otherwise be conducted as described in paragraphs a. through f. of this condition. The Permittee shall continue to make annual certifications of “no adjustments” since the previous tune-up.
- h. As an alternative to complying with the requirements in this condition, the Permittee shall submit documentation no later than April 30 of each year confirming that an affected unit will not operate during the months of May through September. As a minimum, the documentation shall include the identification of the facility, the permit number, and the specific affected units that will not be operated.

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
  - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 7 of 14**

**7. Notification, Reporting and Record Keeping Requirements**

- 7.1 The Permittee shall maintain the following records as they pertain to the operation of the boiler with ID No. B1. These records shall be maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1.]

***NSPS Dc***

- a. Quantity of natural gas combusted monthly in the boiler;  
[40 CFR 60.48c(g)(2)]
- b. Quantity of distillate fuel oil burned monthly in the boiler; If no distillate fuel oil was combusted during the month, the records shall so state.  
[40 CFR 60.48c(g)(2)]
- c. Distillate Fuel Oil supplier certifications containing the following information, if applicable, for each shipment of said fuel:  
[40 CFR 60.42c(h), 40 CFR 60.44c(h), 40 CFR 60.45c(d), 40 CFR 60.46c(e), and 40 CFR 60.48c(g)(11); 40 CFR 60.48c(f)]
  - i. The name of the distillate fuel oil supplier;
  - ii. A statement from the distillate fuel oil supplier that the distillate fuel oil complies with the specifications specified in Condition 2.10; and
  - iii. The sulfur content or the maximum sulfur content of the oil.

***Avoidance of 40 CFR 63 Subpart JJJJJ***

- d. For each *period of gas curtailment or supply interruption* as defined in 40 CFR 63.11237 in which distillate fuel oil was combusted:
  - i. Start Date/Time of distillate fuel oil combusted;
  - ii. End Date/Time of distillate fuel oil combusted;
  - i. Written substantiation supporting the claim of *period of gas curtailment or supply interruption* and why the boiler should remain classified as a *gas-fired boiler* per 40 CFR 63 Subpart JJJJJ, as applicable;
  - iii. Volume of distillate fuel oil combusted during said time period; and
  - iv. Max. NO<sub>x</sub> emissions in ppmvd @ 3% oxygen while combusting distillate fuel oil and the basis for this emissions value if time period is May 1 through September 30 of each calendar year.



**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 8 of 14**

- e. For each periodic testing, maintenance, or operator training on distillate fuel oil for the operation of boiler with ID No. B1.
  - ii. Start Date/Time of distillate fuel oil combusted;
  - iii. End Date/Time of distillate fuel oil combusted;
  - iv. Written substantiation supporting the claim of *period testing, maintenance, or operator training* and why the boiler should remain classified as a *gas-fired boiler* per 40 CFR 63 Subpart JJJJJ, as applicable;
  - v. Volume of distillate fuel oil combusted during said time period; and
  - vi. Max. NO<sub>x</sub> emissions in ppmvd @ 3% oxygen while combusted distillate fuel oil and the basis for this emissions value if time period is May 1 through September 30 of each calendar year.

7.2 The Permittee shall submit a written report containing the following for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period.  
[391-3-1-.02(6)(b)1.]

- a. Records required by Conditions 7.1a., and 7.1b.;  
[40 CFR 60.48c(d), 40 CFR 60.48c(e), and 40 CFR 60.48c(j)]
- b. Each distillate fuel oil supplier certification required by Condition 7.1c. In addition, the report shall include a certified statement signed by the Permittee that all the records of the distillate fuel oil supplier certifications submitted in accordance with this Condition represents all the distillate fuel oil fired during the reporting period;  
[40 CFR 60.48c(d), 40 CFR 60.48c(e), and 40 CFR 60.48c(j)]
- c. Reason for combusting distillate fuel oil via records required by Conditions 7.1d. and/or 7.1e. and why the boiler with ID No. B1 should remain classified as a *gas-fired boiler* rather than be re-classified as an *oil-fired boiler*; and
- d. If no distillate fuel oil was combusted during the reporting period, the semiannual report shall so state.  
[40 CFR 60.48c(d), 40 CFR 60.48c(e), and 40 CFR 60.48c(j)]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 9 of 14**

***Verification of Compliance with VOC Emissions Limit***

7.3 The Permittee shall maintain the following monthly records. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.

[391-3-1-.02(6)(b)1]

- a. Usage records of all VOC-containing materials used at the facility. These usage records shall also include all inks, pH adjuster, soap, adhesives, and parts washing materials used at the facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the VOC content of waste materials from the VOC emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the VOC content of the containerized waste material, and documentation of the method for determining the VOC content of the waste material.
- b. Usage records of natural gas combusted at the facility (NG) in ft<sup>3</sup>/month;
- c. Usage records of distillate fuel oil combusted at the facility (DFO) in gallons/month;
- d. Usage records of fuel combusted in the fire pump engine;
- e. The square footage of single layer liner/medium processed in Corrugator (ID No. P8, SWA) in 1000 square feet (or MSF);
- f. The square footage of double layer liner/medium processed in Corrugator (ID No. P8, DWA) in 1000 square feet (or MSF); and

7.4 The Permittee shall use the records required by Conditions 7.3b. and c. to determine and record monthly VOC emissions from Boiler B1 using AP-42 emissions factors. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.

[391-3-1-.02(6)(b)1]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 10 of 14**

- 7.5 The Permittee shall use the records required by Condition 7.3e. and f. to determine and record monthly VOC emissions from the Corrugator (ID No. P8) according to the following formula. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

$$\text{VOC}_{\text{Corrugator}} = (\sum(\text{EF}_{\text{SW}} * \text{SWA})/2000) + (\sum(\text{EF}_{\text{DW}} * \text{DWA})/2000)$$

$\text{EF}_{\text{SW}}$  = Single Wall VOC EF, 2.2E-03 lb/MSF  
 $\text{EF}_{\text{DW}}$  = Double Wall VOC EF, 3.5E-03 lb/MSF  
 $\text{SWA}$  = Monthly single wall square footage processed by P8, MSF  
 $\text{DWA}$  = Monthly double wall square footage processed by P8, MSF  
2000 = Conversion Factor

- 7.6 The Permittee shall use the records required by Conditions 7.3d. to determine and record monthly VOC emissions from the fire pump engine (FP1). All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

- 7.7 The Permittee shall use the records required by Condition 7.3a. to determine and record the monthly VOC emissions from the facility (excluding the Boiler, Corrugator, and Fire Pump Engine) according to the following formulas. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

- a.  $\text{VOC}_i$  (lbs./month) = Material use (lbs.) \* (percent weight VOC); or
- b.  $\text{VOC}_i$  (lbs./month) = Material used (gallons) \* (VOC Content lbs./gallon);
- c.  $\text{VOC}_w$  (lbs./month) = Waste Material (lbs.) \* (percent weight VOC); or
- d.  $\text{VOC}_w$  (lbs./month) = Waste Material (gallons) \* (VOC Content lbs./gallon)
- e. Total VOC (lbs./month) =  $(\sum_{i=1}^n \text{VOC}_i - \sum_{w=1}^n \text{VOC}_w)$

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 11 of 14**

7.8 The Permittee shall use the records required in Conditions 7.4 through 7.7 to determine and record the total monthly emissions of VOCs from the entire facility. All demonstration calculations, including any Division-approved emission factors, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required by this Condition. The Permittee shall notify the Division in writing if emissions of VOCs exceed 2.08 tons from the entire facility, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

7.9 The Permittee shall use the written records required by Condition 7.8 to determine and the twelve-month rolling total emissions of VOCs for each month from the entire facility. The Permittee shall notify the Division in writing if the VOC emissions from the entire facility equal or exceed 25 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.1. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

***Verification of Compliance with MACT Avoidance***

7.10 The Permittee shall maintain the following monthly records:  
[391-3-1-.02(6)(b)1]

- a. Usage records of all HAP-containing materials for all materials used from the entire facility. These usage records shall also include all inks, pH adjuster, soap, adhesives, and parts washing materials used at the facility regardless of their HAP content. These records shall include the total weight of each material used and the HAP content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the HAP content of waste materials from the HAP emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the HAP content of the containerized waste material, and documentation of the method for determining the HAP content of the waste material. These records shall be maintained in a format suitable and available for inspection and/or submittal to the Division.

7.11 The Permittee shall use the records required by Conditions 7.3b. and c. to determine and record the monthly individual HAP emissions (hexane and formaldehyde) from Boiler B1 using AP-42 emissions factors. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 12 of 14**

- 7.12 The Permittee shall use the records required by Condition 7.3e. and f. to determine and record the monthly individual HAP emissions (acetaldehyde, acrolein, formaldehyde, methanol, and propionaldehyde) from the Corrugator (ID No. P8) according to the following formula. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

$$\text{Indiv. HAP}_{\text{Corrugator}} = (\sum(\text{EF}_{\text{HAPSW}} * \text{SWA})/2000) + (\sum(\text{EF}_{\text{HAPDW}} * \text{DWA})/2000)$$

$\text{EF}_{\text{HAPSW}}$  = Single Wall Indiv. HAP EFs, Acetaldehyde = 1.7E-04 lb/MSF;  
Acrolein = 8.2E-05 lb/MSF; Formaldehyde = 1.2E-04 lb/MSF; Methanol = 2.0E-03 lb/MSF; and Propionaldehyde = 6.5E-05 lb/MSF  
 $\text{EF}_{\text{HAPDW}}$  = Double Wall Indiv. HAP EFs, Acetaldehyde = 2.2E-04 lb/MSF; Acrolein = 8.3E-05 lb/MSF; Formaldehyde = 1.6E-04 lb/MSF; 3.3E-03 lb/MSF; and Propionaldehyde = 1.3E-04 lb/MSF.  
 $\text{SWA}$  = Monthly single wall square footage processed by P8, MSF  
 $\text{DWA}$  = Monthly double wall square footage processed by P8, MSF  
2000 = Conversion Factor

- 7.13 The Permittee shall use the records required by Conditions 7.3d. to determine and record monthly individual HAP emissions (formaldehyde, acetaldehyde, and toluene) from the fire pump engine (FP1). All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]
- 7.14 The Permittee shall use the records required by Condition 7.10a. to determine and record the monthly individual HAP emissions and total HAP emissions from the facility (excluding the Boiler, Corrugator, and Emergency Generator(s)) according to the following formulas. All calculations should be kept as part of the monthly record and maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

- a.  $\text{HAP}_i$  (lbs./month) = Material use (lbs.) \* (percent weight HAP); or
- b.  $\text{HAP}_i$  (lbs./month) = Material used (gallons) \* (HAP Content lbs./gallon);
- c.  $\text{HAP}_w$  (lbs./month) = Waste Material (lbs.) \* (percent weight HAP); or
- d.  $\text{HAP}_w$  (lbs./month) = Waste Material (gallons) \* (HAP Content lbs./gallon)
- e. Total Individual HAP (lbs./month) =  $(\sum_{i=1}^n \text{HAP}_i - \sum_{w=1}^n \text{HAP}_w)$ ; and
- f. Total HAPs (lb/month) =  $\sum$ (Total Individual HAP (lb/month))

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 13 of 14**

7.15 The Permittee shall use the records required in Condition 7.11 through 7.14 to determine and record the total monthly emissions of combined hazardous air pollutants and the total monthly emissions of each listed hazardous air pollutant, as applicable from the entire facility. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in this Condition. The Permittee shall notify the Division in writing if emissions of any individual hazardous air pollutant exceed 0.83 tons from the entire facility, or if emissions of all listed hazardous air pollutants combined exceed 2.08 tons from the entire facility, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.2. These records shall be maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

7.16 The Permittee shall use the written records required by Condition 7.15 to determine and record the twelve-month rolling total emissions of each individual HAP for each month and the twelve-month rolling total combined HAP emissions for each month from the entire facility for each calendar month. The Permittee shall notify the Division in writing if the combined HAP emissions from the entire facility equal or exceed 25 tons and/or any individual HAP equals or exceeds 10 tons during any consecutive twelve-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.2. These records shall be maintained in a format suitable and available for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]

7.17 The Permittee shall submit written notification of initial startup of the new flexographic folder-gluer machine (ID No. P11) to the Division within 15 days after such date. The notification shall be submitted to:

Mr. Sean Taylor  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta GA 30354

## **8. Special Conditions**

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.

8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2653-089-0074-S-04-0**

**Page 14 of 14**

- 8.3 All Air Quality permits issued to the Permittee including Permit No. 2653-089-0074-S-03-0 are hereby revoked in their entirety.