



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Graphic Packaging International, LLC – Augusta Mill

Facility Address: 4278 Mike Padgett Highway (Highway 56 South)
Augusta, Georgia 30906, Richmond County

Mailing Address: 4278 Mike Padgett Highway (Highway 56 South)
Augusta, Georgia 30906

Parent/Holding Company: Graphic Packaging International, LLC

Facility AIRS Number: 04-13-245-00006

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:

The replacement or modification of multiple emissions units throughout the Mill.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

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 Amendment and Permit No. 2631-245-0006-V-05-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This 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 App No. 753079 dated September 6, 2023; any other applications upon which this Amendment or Permit No. 2631-245-0006-V-05-0 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 Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **18** pages.



Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The facility is proposing to replace or modify multiple emissions units throughout the Mill as part of the modification, as summarized below. The Project includes some smaller projects that are planned to be completed in 2023 that the Mill has submitted off-permit changes for. These projects primarily impact water usage and process stability and will have minimal impact on pulp production.

No. 2 Fiberline

The facility proposes to replace the No. 2 Brownstock Washer (Emissions Unit BSW2), which is currently a vacuum-drum style washer, with a displacement drum (DD) style washer. In addition to the No. 2 Brownstock Washer Replacement, the Mill proposes to complete several projects for the No. 2 Fiberline to improve process stability and reduce hydraulic and organic loading to the WWTP.

No. 3 Fiberline

The facility proposes to replace the chip meter on the No. 3 Digester (part of Emissions Unit LVHC) with a turbo chip meter which will allow for increased chip feed and therefore increased production rates on the No. 3 Digester. The facility proposes to install a cold blow cooler to cool the wash filtrate, as the increased pulp production will result in higher blow gas temperatures. In addition to the turbo chip meter and cold blow cooler, the facility proposes to complete several projects for the No. 3 Fiberline to improve process stability and reduce hydraulic and organic loading to the WWTP.

Causticizing Area

The facility proposes to complete the following projects in the causticizing area, in addition to other miscellaneous equipment and operational changes intended to improve stability of the causticizing area:

- Upgrade the ECO filters.
- Replace the No. 1 Slaker (Emissions Unit SLK1A).
- Upgrade controls on the Chlorine Dioxide Generator (Emissions Unit R10A).

Paper Machine Area

The Mill proposes to implement whitewater filtering and reuse on the showers on Nos. 1 and 3 Paper Machines.

Power House Area

The facility plans to implement the following projects in the Power House area:

- Bleach Plant E-stage effluent will be repurposed for wet ash sluicing and will replace fresh water currently used for this purpose.
- A cooling tower will be installed (New Emissions Unit Paper Machine (PM) Cooling Tower) for the No. 1 Paper Machine vacuum pump seal water supply, creating a closed loop and eliminating freshwater usage for this purpose.

Additionally, as part of this permit modification, the facility plans to remove coal as a permitted fuel for the No. 1 Power Boiler. The Mill's coal storage and handling equipment have been demolished or are no longer operable, and the facility does not have plans to burn coal in the future.

Mill General

The facility plans to implement the following projects throughout the Mill:

- A cooling water collection system will be added to the Lime Kiln Trunnion to collect and reuse cooling water, reducing freshwater usage and flow to the WWTP.
- Air conditioning water from motor control rooms across the Power House will be collected for reuse in the Mill processes.
- Flow meters will be installed to monitor seal water use and reduce seal water infiltration into the process. Seals will be converted to zero water use seals where appropriate across the Mill.
- Air conditioning systems in shops, stores, and office areas will be converted from Mill water to cooling water using the No. 2 Turbine Generator cooling tower.
- The remote hydraulic coolers in the Woodyard area will be changed from water to air cooled systems.
- Control valves and programming will be installed to maximize preferential use of whitewater from the No. 3 Paper Machine vacuum sump tank to prevent overflows to the sewer.

Section 1.3 of the facility's Title V Operating Permit 2631-245-0006-V-05-0 included the facility's overall process description. That section will be modified as part of this permit amendment to remove "pulverized coal" as a permitted fuel for the No. 1 Power Boiler in the discussion about the Power and Recovery Operations in addition to addressing typographical errors in the discussion of the NCG Control Systems. The changes to Section 1.3 Title V Operating Permit 2631-245-0006-V-05-0 are as follows:

Power and Recovery Operations

The Augusta Mill operates three power boilers and a standby package boiler. The steam produced from these units along with the recovery boiler provides all of the Mill's required steam. Three steam turbine generators produce most of the electric energy required to operate the mill, and excess electric capacity may be sold to the electrical grid.

The No. 1 Power Boiler may be fired with bark, dewatered primary wastewater clarifier sludge, ~~pulverized coal~~, natural gas, sawdust and bark that may contain small amounts of oil residue. The No. 2 Power Boiler may be fired with natural gas only. The Nos. 1 and 2 Power Boilers, as well as Lime Kiln 2, also serve as control devices for the non-condensable gas (NCG) system. Finally, the No. 3 Power Boiler is permitted to fire bark, dewatered primary wastewater clarifier sludge, natural gas, and sawdust or bark containing small amounts of oil residue. The Riley Auxiliary Boiler fires No. 2 fuel oil or natural gas. The No. 3 Power Boiler is equipped with an electrostatic precipitator (ESP) for particulate matter (PM) control. PM control in the No. 1 Power Boiler is accomplished with multicyclones followed by two parallel wet scrubbers. Except for natural gas, ~~All~~ fuels are generated either on-site or delivered by truck or rail and stored at the site.

In the chemical recovery area, weak black liquor from hardwood or softwood pulp washing is stored and sent to the Nos. 1, 2, and 3 Evaporator Systems, where it is concentrated and sent to intermediate storage. Under the Innovations Project (MACT I, Phase 2 Equivalency by Permit), emissions from the existing Nos. 1, 2, and 3 Weak Black Liquor Tanks are controlled in the No. 2 Lime Kiln.

The evaporators are vented to the low-volume, high-concentration (LVHC) NCG Control System. The concentrated black liquor is fired in the No. 3 Recovery Boiler, which is a non-direct contact evaporator (NDCE) design and receives its liquor from the final evaporation stage. The evaporation process includes a high solids concentrator stage that may be used to increase the solids firing concentration in the recovery boiler. Auxiliary fuels fired include No. 2 fuel oil and natural gas. PM emissions from the No. 3 Recovery Boiler is controlled by the ESP.

The organics from the black liquor combusted in the No. 3 Recovery Boiler generate heat for process steam while the inorganic chemicals collect in the bottom of the recovery boiler in the form of molten smelt. The smelt from the recovery boiler is directed to a smelt dissolving tank where it is dissolved in weak wash or water to form green liquor. PM and total reduced sulfur (TRS) compound emissions from the No. 3 Smelt Tank are controlled by a wet scrubber.

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NCG Control Systems

The Augusta Mill employs an NCG collection system to minimize emissions from the facility and to comply with environmental regulations. The NCG collection system consists of the following:

- The LVHC Gas Control System (LVHC) is the concentrated NCG collection system that routes concentrated LVHC gases from the Nos. 2 and 3 Digesters, Nos. 2 and 3 Evaporator Systems, No. 2 Evaporator Hotwell, Nos. 2 Digester Area Foul Condensate Collection Tanks, and Main Foul Condensate Tank to the No. 2 Lime Kiln, or the Nos. 1 or 2 Power Boilers for thermal oxidation. When LVHC NCGs are routed to the Nos. 1 or 2 Power Boilers, the White Liquor Scrubbers must be operated.
- The HVLC Gas Control System (Dilute Pulping Process NCG and TRS System)_(HVLC2) is the dilute NCG collection system that routes dilute HVLC gases from the Nos. 2 and 3 Digesters Chip Bins, the Nos. 2 and 3 Digester Blow Tanks, and the BLOX tank to the No. 2 Lime Kiln, Nos. 1 or 2 Power Boilers for thermal oxidation.

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- Under the Innovations Project, the HVLC Gas Control System (Innovations)_(HVLC1) collects the HVLC gases from the No. 2 A/B Filtrate Tank and the Nos. 1, 2, and 3 Weak Black Liquor Process Vessels for control in the No. 2 Lime Kiln.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

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

3.1.1 Additional Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LK1A	No. 1 Lime Kiln	40 CFR 63 Subpart A 40 CFR 63 Subpart MM 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	LK1B LK1C	No. 1 Lime Kiln Venturi Scrubber No. 1 Lime Kiln Dust Bin (Cyclone)
LK2A	No. 2 Lime Kiln	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart S 40 CFR 63 Subpart MM 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	LK2B LK2C	No. 2 Lime Kiln Venturi Scrubber No. 2 Lime Kiln Dust Bin (Cyclone)
LS1A	No. 1 Lime Silo	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	LS1B	No. 1 Lime Silo Baghouse
LS3A	No. 3 Lime Silo	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	LS3B	No. 3 Lime Silo Baghouse
SS2A	No. 2 Starch Silo	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SS2B	No. 2 Starch Silo Baghouse
SS3A	No. 3 Starch Silo	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SS3B	No. 3 Starch Silo Baghouse
SLK1A	No. 1 Slaker	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SLK2A	No. 2 Slaker	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SBV2	No. 2 Starch Bin Vent	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB2A	No. 2 Starch Bin Vent Baghouse
SBV3	No. 3 Starch Bin Vent	40 CFR Part 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SB3A	No. 3 Starch Bin Vent Baghouse

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
RB3A	No. 3 Recovery Boiler	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 60 Subpart BBa 40 CFR 63 Subpart A 40 CFR 63 Subpart MM 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RB3B	No. 3 Recovery Boiler Electrostatic Precipitator
ST3A	No. 3 Smelt Tank	40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart MM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)	ST3B	No. 3 Smelt Tank Wet Scrubber
PB1A	No. 1 Power Boiler	40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 61 Subpart A 40 CFR 61 Subpart E 40 CFR 63 Subpart A 40 CFR 63 Subpart S 40 CFR 63 Subpart DDDDD 40 CFR Part 64 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	PB1B PB1C	No. 1 Power Boiler Dual Venturi Scrubbers (North and South)
PB2A	No. 2 Power Boiler	40 CFR 60 Subpart A 40 CFR 60 Subpart BB 40 CFR 63 Subpart A 40 CFR 63 Subpart S 40 CFR 63 Subpart DDDDD 40 CFR Part 64 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	None	None
PB3A	No. 3 Power Boiler	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 61 Subpart A 40 CFR 61 Subpart E 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 40 CFR Part 64 391-3-1-.02(2)(a)3(i) 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	PB3B	No. 3 Power Boiler Electrostatic Precipitator
RLYA	Riley Auxiliary Boiler	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
BP2A	No. 2 Bleach Plant	40 CFR 63 Subpart A 40 CFR 63 Subpart S 391-3-1-.02(2)(a)3(ii)	BP2B	No. 2 Bleach Plant Packed Tower Scrubber

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
B03A	No. 3 Bleach Plant	40 CFR 63 Subpart A 40 CFR 63 Subpart S 391-3-1-.02(2)(a)3(ii)	BP3B	No. 3 Bleach Plant Packed Tower Scrubber
R10A	Chlorine Dioxide Generator	391-3-1-.02(2)(a)3(ii)	R10B R2AB	Chlorine Dioxide Generator Packed Tower Scrubbers
LVHC	<u>LVHC Gas Control System</u> No. 2 Digester System; No. 3 Digester System; No. 2 Evaporator System; No. 3 Evaporator System; No. 2 Evaporator Hotwell; No. 2 Digester Area Foul Condensate Collection Tanks; Main Foul Condensate Tank	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart S (all sources) 40 CFR 60 Subpart A 40 CFR 60 Subpart BB (Nos. 2 and 3 Digesters) 40 CFR 60 Subpart A 40 CFR 60 Subpart BBa (No. 3 Evaporator and No. 3 Digester System) 391-3-1-.02(2)(gg) (No. 2 Evaporator System; No. 2 Evaporator Hotwell)	LK2A PB1A PB2A WLSA WLSB	No. 2 Lime Kiln No. 1 Power Boiler No. 2 Power Boiler White Liquor Scrubbers
HVLC1	<u>HVLC Gas Control System (Innovations)</u> No. 2 A/B Filtrate Tank; Nos. 1, 2 and 3 Weak Black Liquor Process Vessels	391-3-1-.02(2)(a)3	LK2A	No. 2 Lime Kiln
HVLC2	<u>HVLC Gas Control System Dilute Pulping Process NCG and TRS System</u> No. 2 Digester Chip Bin; No. 3 Digester Chip Bin; No. 2 Digester Blow Tank; No. 3 Digester Blow Tank; BLOX Tank	40 CFR 52.21	LK2A PB1A PB2A	No. 2 Lime Kiln No. 1 Power Boiler No. 2 Power Boiler
PPCC	Pulping Process Condensate Collection System	40 CFR 63 Subpart A 40 CFR 63 Subpart S	CP03	Wastewater Treatment Pond No. 3
COAL	NSPS Subpart Y Regulation Coal System (including 1 main truck/rail car unloading system, 1 main storage (4 silos), 1 coal crusher, and the handling and transport system)	40 CFR 60 Subpart A 40 CFR 60 Subpart Y 391-3-1-.02(2)(n)	None	None
WOOD	Wood Chip, Bark, and Log Storage and Handling	391-3-1-.02(2)(n)	None	None
WWTP	Wastewater Treatment Plant and Associated Sludge Plant, Wastewater Handling, and Landfill Activities	None	None	None
PAPR	Paperboard Machines	None	None	None
HDST	High Density Unbleached Pulp Process Vessels	None	None	None
CAUS	Causticizing Operations (Except Kilns)	None	None	None

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BSW2	No. 2 Line Brownstock Washers	40 CFR 60 Subpart A 40 CFR 60 Subpart BBa 40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii)	None	None
BSW3	No. 3 Line Brownstock Washers	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii)	None	None
BC03	Brownstock Washer Consistency Chest	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii)	None	None
ESC3	No. 3 Evaporator Surface Condenser	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii) 391-3-1-.03(10)(d)1(iii)	PPCC CP03	Pulping Process Condensate Collection System Wastewater Treatment Pond No.3
BLCC	Black Liquor Concentrator Condenser	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii) 391-3-1-.03(10)(d)1(iii)	PPCC CP03	Pulping Process Condensate Collection System Wastewater Treatment Pond No.3
BL01	No. 2 Weak Black Liquor Process Vessel	391-3-1-.02(2)(a)3	HVLC1	HVLC Gas Control System (Innovations)
BL03	No. 1 Weak Black Liquor Process Vessel	391-3-1-.02(2)(a)3	HVLC1	HVLC Gas Control System (Innovations)
BL07	No. 3 Weak Black Liquor Process Vessel	391-3-1-.02(2)(a)3	HVLC1	HVLC Gas Control System (Innovations)
BL04	No. 4 Weak Black Liquor Process Vessel	None	None	None
BL20	East Weak Black Liquor Process Vessel	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii)	None	None
BL21	West Weak Black Liquor Process Vessel	40 CFR 63 Subpart A 40 CFR 63.99(a)(11)(ii)	None	None
APRX	Air Products Oxidation/Polisher (APROX) Flash Tank	391-3-1-.02(2)(a)3	HVLC2	HVLC Gas Control System Dilute Pulping Process NCG and TRS System
2ABF	No. 2 A/B Filtrate Tank	391-3-1-.02(2)(a)3	HVLC1	HVLC Gas Control System (Innovations)
LK1D	No. 1 Lime Kiln Auxiliary Drive	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
LK2D	No. 1 Lime Kiln Auxiliary Drive	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
RB3D	MACT ZZZZ& NSPS IIII New Emergency engines (No. 3 Recovery Boiler Sump Pump)	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
FWP1 FWP2	MACT ZZZZ Existing Emergency Engines (Nos. 1 and 2 Auxiliary Fire Pumps)	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

3.3 Equipment Federal Rule Standards

DELETED

No. 1 Power Boiler

- 3.3.7 ~~The coal fired in the No. 1 Power Boiler (PB1A) shall not exceed 1.2 percent sulfur by weight.~~
~~[Avoidance of 40 CFR 52.21]~~

MODIFIED CONDITION

Pulping Process LVHC Gas Control Systems

- 3.3.12 The Permittee shall process the LVHC NCG Collection System gases in the following manner:
- a. From the Nos. 2 ~~and 3~~ Digesters of the LVHC Emission Group:
 - i. The gases are combusted in the No. 2 Lime Kiln (LK2A), or
[40 CFR 60.283(a)(1)(i)]
 - ii. The gases are combusted in the Nos. 1 and/or 2 Power Boilers (PB1A and PB2A).
[40 CFR 60.283(a)(1)(iii)]
 - b. From the No. 2 Evaporator System and No. 2 Evaporator Hot Well of the LVHC Emission Group:
 - i. The gases are combusted in the No. 2 Lime Kiln (LK2A), or
[391-3-1-.02(2)(gg)]
 - ii. The gases are combusted in the Nos. 1 and/or 2 Power Boilers (PB1A and PB2A).
[391-3-1-.02(2)(gg)]
 - c. From the No. 3 Evaporator System (EV3) and the No. 3 Digester of the LVHC Emission Group
 - i. The gases are collected in an LVHC or HVLC closed-vent system meeting the requirements of 40 CFR 63.450 and combusted in the No. 2 Lime Kiln; or
[40 CFR 60.283a(a)(1)(i)]
 - ii. The gases are collected in an LVHC or HVLC closed-vent system meeting the requirements of 40 CFR 63.450 and combusted with other waste gases in the Nos. 1 and/or 2 Power Boilers (PB1A and PB2A) such that the gases are subjected to a minimum temperature of 650°C, 1200°F) for at least 0.5 seconds.
[40 CFR 60.283a(a)(1)(iii)]

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- d. When combusting the concentrated TRS gas streams of Emission Group LVHC in the Nos. 1 and 2 Power Boilers (PB1A and PB2A), the gases shall be scrubbed in one of the White Liquor Scrubbers (WLSA and WLSB) prior to entering the boilers. The White Liquor Scrubbers operate in parallel and act as backups to each other. In the event of malfunction of the scrubber and the unavailability of the No. 2 Lime Kiln (LK2A) as an incineration device, the Permittee shall be subject to the reporting requirements of Condition No. 6.1.2.
[Avoidance of 40 CFR 52.21]

DELETED

Coal System

- ~~3.3.25 The Permittee shall not cause, let, suffer, permit or allow emissions from the Coal System (COAL) the opacity of which is equal to or greater than 20 percent.
[40 CFR 60.254(a) and 391-3-1-.02(2)(n)1]~~

MODIFIED CONDITION

- 3.3.38 The Permittee shall comply with all applicable provisions of 40 CFR 60 Subpart BB, “*Standards of Performance for Kraft Pulp Mills*,” and 40 CFR 60 Subpart A, “*General Provisions*,” for the operation of the No. 2 Lime Kiln (LK2A), No. 3 Recovery Boiler (RB3A), No. 3 Smelt Tank (ST3A), and Nos. 2 and 3 Digesters of the LVHC Emission Group.
[40 CFR 60 Subparts A and BB]

DELETED

- ~~3.3.39 The Permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Y, “*Standards of Performance for Coal Preparation Plants*,” and 40 CFR 60 Subpart A, “*General Provisions*,” for the operation of the Coal System (COAL) including preparation, handling, and storage.
[40 CFR 60 Subparts A and Y]~~

MODIFIED CONDITION

- 3.3.46 The Permittee shall comply with all applicable provisions of 40 CFR 60 Subpart BBa, “*Standards of Performance for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013*,” and 40 CFR 60 Subpart A, “*General Provisions*,” for the operation of No. 3 Recovery Boiler (RB3A), and No. 3 Evaporator of the LVHC Emission Group, the No. 2 Line Brownstock Washer (BSW2), and the No. 3 Digester System of the LVHC Emission Group.
[40 CFR 60 Subparts A and BBa]

3.4 Equipment SIP Rule Standards

MODIFIED CONDITION

Coal System & Wood Handling and Storage

3.4.17 The Permittee shall take all reasonable precautions to prevent dust from the ~~Coal System (COAL)~~ and Wood Chip, Bark, and Log Storage and Handling (WOOD) from becoming airborne. Reasonable precautions which could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)1]

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces which can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dusts;
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

MODIFIED CONDITION

3.4.18 The percent opacity from any fugitive dust source, including, but not limited to, the ~~Coal System~~ and Wood Chip, Bark and Log Storage and Handling (~~COAL~~ and WOOD), shall not equal or exceed 20 percent.
[391-3-1-.02(2)(n)2]

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

MODIFIED CONDITION

40 CFR 63 Subpart S (Periodic Testing)

4.2.10 The Permittee shall perform repeat performance tests at five-year intervals for all emission sources subject to the limitations in 40 CFR 63.443, 40 CFR 63.444, and 40 CFR 63.445. The repeat performance tests must be conducted within 60 months from the date of the previous performance test. Performance tests shall be conducted based on representative performance of the affected source for the period being tested. Upon request, the Permittee shall make available to the Division such records as may be necessary to determine the conditions of performance tests. Five-year repeat testing is not required for the following: [40 CFR 63.7 and 40 CFR 63.457(a) and (o)]

- a. Knotter or screen systems with HAP emission rates below the following criteria: specified in 40 CFR 63.443(a)(1)(ii).
 - i. Each knotter system with emissions of 0.05 kg or more of total HAP per megagram of ODP (0.1 lb/ton).
 - ii. Each screen system with emissions of 0.10 kg or more of total HAP per megagram of ODP (0.2 lb/ton).
 - iii. Each knotter and screen system with emissions of 0.15 kg or more total HAP per megagram of ODP (0.3 lb/ton).
- b. Decker systems using fresh water or paper machine white water, or decker systems using process water with a total HAP concentration less than 400 parts per million by weight.
- c. An initial performance test to determine total HAP emissions from each knotter system and each screen system on No. 3 Fiberline shall be conducted within 180 days of startup of the systems to verify total HAP emission rates from the systems remain below the applicable exemption criteria of 63.443(a)(1)(ii).
[40 CFR 63.7, 40 CFR 63.443(a)(1)(B)]

NEW CONDITION

- 4.2.23 A performance test of the Displacement Drum Washer on the No. 2 Line Brownstock Washers (BSW2) shall be performed within 180 days of startup of the Displacement Drum Washer. A written report shall be prepared containing the results of the testing as well as the values to show continued emission reduction parity with MACT I, Phase 2 as described in Section 1.3 of this permit – Overall Facility Process Description, MACT I, Phase 2 Equivalency-by-Permit.
[40 CFR 63.7 and 40 CFR 63.99(a)(11)(ii)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

DELETED

Coal Sampling

5.2.10 ~~The Permittee shall obtain an analysis of each shipment of coal for sulfur content, moisture content, and Gross Caloric Value (GCV). The sample shall be acquired and analyzed using the procedures of Section 5.2.1 in Method 19 of the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**. The Permittee may use Test Method ASTM D1989 for determining GCV of the coal sample in lieu of the method specified in Method 19.~~

~~[Avoidance of 40 CFR 52.21, 391-3-1-.02(2)(g)2, and 391-3-1-.02(6)(b)1]~~

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)] //add citations from specific standards (i.e. NSPS) that require excess emissions reporting//

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

No Changes

- 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)

No Changes

- 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)

Permit Conditions 6.1.7.c.i through 6.1.7.c.xiv – No Changes

...

DELETED

xv. ~~Any time coal fired in the No. 1 Power Boiler (PB1A) has a sulfur content greater than 1.2 percent by weight.~~

~~[Avoidance of 40 CFR 52.21 and 391-3-1-.02(6)(b)1]~~

Permit Conditions 6.1.7.c.xvi through 6.1.7.c.xix – No Changes

- 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:

DELETED

i. ~~Results of the analyses of the coal samples as specified in Condition No. 5.2.10.~~
~~[Avoidance of 40 CFR 52.21, 391-3-1-.02(2)(g)2, and 391-3-1-.02(6)(b)1]~~

...

Permit Conditions 6.1.7.d.ii through 6.1.7.d.xii – No Changes

6.2 Specific Record Keeping and Reporting Requirements

MODIFIED CONDITION

Coal System and Wood Handling and Storage

- 6.2.18 The Permittee shall maintain a record of all systems in place to suppress fugitive dust from the Coal System (COAL) and Wood Chip, Bark, and Log Storage and Handling (WOOD). Any actions taken outside of the established systems shall be documented including the date and time of occurrence and a description of actions taken.
[391-3-1-.02(2)(n), 391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

NEW CONDITION

Application No. 753079 – 5R Project

- 6.2.57 Before beginning actual construction of the project as described by Application No. 753079, the Permittee shall document and maintain a record of the following information:
[391-3-1-.02(7)(b)15.(i)(I)]

- a. A description of the project;
- b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
- c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)III. and an explanation for why such amount was excluded, and any netting calculations, if applicable.
- d. The records required by this condition shall be retained for a period of 10 years following resumption of regular operations after the change, or for a period of 15 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit of a regular NSR pollutant at such emission unit.

NEW CONDITION

- 6.2.58 For the project as described by Application No. 753079, the Permittee shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in Condition 6.2.57.b, and calculate and maintain a record of the annual emissions, in tons-per-year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit that regulated NSR pollutant at such emissions unit. These records shall be retained for a period of five years past the end of each calendar year. If the Permittee is required to or elects to exclude emissions associated with startups, shutdowns, and/or malfunctions from estimations of projects actual emissions for PSD applicability purposes as allowed by Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)II., the Permittee may exclude such emissions from the calculations of annual emissions.
[391-3-1-.02(7)(b)15.(i)(III)]

NEW CONDITION

- 6.2.59 For the project as described by Application No. 753079, if the Permittee excluded demand growth emissions from the projected actual emissions for a project and that project is subject to the requirements of Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)III.A.(B), the Permittee shall calculate the actual increase in emissions due to demand growth, in tons per year on calendar year basis, for a period of 10 years following resumption of regular operations after the change. These records shall be retained for a period of five years past the end of each calendar year.
[391-3-1-.02(7)(b)15.(i)(IV)]

NEW CONDITION

- 6.2.60 For the project as described by Application No. 753079, the Permittee shall submit a report to the Division within 60 days after the end of each year during which records must be generated under Conditions 6.2.58 and 6.2.59, setting out the unit's annual emissions and, if applicable, the unit's actual increase in emissions due to demand growth during the calendar year that preceded submission of the report.
[391-3-1-.02(7)(b)15.(i)(V)]

NEW CONDITION

- 6.2.61 The Permittee shall provide written notification to the Division of the date on which the project as described by Application No. 753079 commences construction and the date on which the project is completed. Such notification shall be submitted in writing within 30 days of the dates of record.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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)

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Attachments

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

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List Of Standard Abbreviations

[illegible]

NAAQS	National Ambient Air Quality Standard
NCG	Non-Condensable Gases
NDCE	Non-Direct Contact Evaporator
ODTUBP	Oven-Dried Tons of Unbleached Pulp
ODTUBSP	Oven-Dried Tons of Unbleached Softwood Pulp
PSEU	Pollutant-Specific Emission Unit
SIL	Significant Impact Level

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ATTACHMENT B

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

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	2
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	5
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a “designated facility” as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	2
	4. Stationary engines burning:	10
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	150
	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.	75
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.	150
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	10
	2. Portable blast-cleaning equipment.	10
	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.	10
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	50
	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.	20

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	50
	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.	20
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.	1
	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.	10
	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.	10
	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.	2
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	1
	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.	
	vi) Feed mill ovens.	100
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	25
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	20
	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.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
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.	50
	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.	50
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	25
	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.	25
	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.	10
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	200
	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).	50

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Steam Turbine Power Generators	3
Green Liquor Surge/Process Vessel and Handling Systems	2
Pulp (Bleached) Process Vessel includes both High Density Storage and Consistency Chests	3
Filter Plant - Water Treatment System for Mill Water Use	1
Black Liquor Soap Process Vessel and Handling Systems	3
Recovery Boiler Saltcake Mix Process Vessel and Handling Systems	2
Bleach Plant Filtrate Process Vessel and Handling Systems	3
Weak Wash Process Vessel and Handling Systems	7
White Liquor Process Bessel and Handling System	5
Sand Blasting	5
Periodic Pond Dredging Activities	10
Fiberglass Working/Repairs	20
Facilities Maintenance Painting	20

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ATTACHMENT B (continued)**GENERIC EMISSION GROUPS**

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

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Chip Screening System	1	Yes		Yes
Log Debarking System	1	Yes		Yes
Wood Chipping System	2	Yes		Yes
Rail Car Dump – Chips	1	Yes		Yes
Truck Dumps – Wood Chips and Biomass	5	Yes		Yes
Truck/Retail Car Unloading – Coal	4	Yes		Yes
Coal Storage and Handling System	4	Yes		Yes
Coal Pulverizers (Ball Crushers)	5	Yes		Yes
Ash Silo	1	Yes		Yes
Dy Ash Handling System	3	Yes		Yes

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.	10,000
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.	2
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	10

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/index.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/software/tanks/index.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).