

Emissions Limits For Units Exempted From Four-Factor Analysis

Three facilities, due to resource limitations and/or uncertainty regarding future operations, requested limits on their affected emissions units in lieu of performing 4-factor analyses: Rayonier Performance Fibers, Packaging Corporation of America, and Southern States Phosphate and Fertilizer. The following conditions have been added to their permits through the permit amendment process.

Permit Conditions for Packaging Corporation of America

Permit No. 2631-185-0001-V-01-A, effective March 4, 2008

Emissions Unit

- CE Power Boiler

3.3.48 The Permittee shall not discharge or cause the discharge into the atmosphere from the CE Power Boiler (Source Code 1017), sulfur dioxides (SO₂) emissions in amounts equal to or exceeding 600 tons during any 12 consecutive month period effective January 1, 2012. [Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

Note: additional monitoring and reporting will be added in the Title V Renewal Permit which will be issued in the next few months.

Permit Conditions for Rayonier Performance Fibers – Jesup Mill

Permit No. 2631-305-0001-V-03-0, effective March 4, 2008

Emissions Units

- Power Boiler No. 2
- Power Boiler No. 3
- No. 5 Recovery Furnace
- No. 6 Recovery Furnace

3.2.4 The Permittee shall limit the combined usage of the total quantity of No. 6 fuel oil in No. 1 Power Boiler, No. 2 Power Boiler, and No. 3 Power Boiler (Source Codes: PB01, PB02, PB03) to 7,423,500 gallons (or 176,750 barrels) per any twelve consecutive months.

[Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

3.2.5 The Permittee shall not discharge or cause the discharge into the atmosphere from No. 3 Power Boiler PB03, sulfur dioxides (SO₂) emissions in amounts equal to or exceeding 149 tons during any 12 consecutive month period.

[Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

3.2.6 The Permittee shall limit the usage of the total quantity of fuel oil in No. 2 Power Boiler (Source Code: PB02) to 1,303,050 gallons (or 31,025 barrels) per any twelve consecutive months.

[Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

3.3.36 Upon completion of Phase 1 projects, the Permittee shall not discharge or cause the discharge, into the atmosphere, from the No. 5 Recovery Furnace (Source Code: RF01), any gases which:

[40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

...

c. Contain sulfur dioxides in excess of 15 ppm, corrected to 8 percent oxygen.

...

3.3.37 Upon completion of Phase 2 projects, the Permittee shall not discharge or cause the discharge, into the atmosphere, from the No. 6 Recovery Furnace (Source Code: RF04), any gases which:

[40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

...

c. Contain sulfur dioxides in excess of 19 ppm, corrected to 8 percent oxygen.

...

3.3.41 The Permittee shall install and operate the Venturi Scrubber (Source Code: PBC9) during all times of Power Boiler PB03 operation. The Permittee shall maintain a minimum of 90 percent control efficiency for sulfur dioxide emissions from this Venturi Scrubber. [Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

4.2.11 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of Phase 1 Project (i.e. after the installation of the Stage Air System on the No.5 Recovery Furnace), the Permittee shall conduct performance tests for Nitrogen Oxide (NO_x), Sulfur Dioxide (SO₂) and Carbon Monoxide (CO) emissions on the No. 5 Recovery Furnace (Source Code: RF01) to demonstrate compliance with Condition 3.3.36. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

4.2.13 Within 60 days after achieving the maximum BLS firing rate at which the source will be operated, but no later than 180 days after the completion of all the Phase 2

Projects, the Permittee shall conduct performance tests for Nitrogen Oxide (NO_x), Sulfur Dioxide (SO₂) and Carbon Monoxide (CO) emissions on the No. 6 Recovery Furnace (Source Code: RF04) to demonstrate compliance with Condition 3.3.37. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

4.2.17 Within 180 days of issuance of this Permit, the Permittee shall conduct a performance test to determine control efficiency for Sulfur Dioxide (SO₂) emissions on the No. 3 Power Boiler Venturi Scrubber PBC9 to demonstrate compliance with the 90 percent limit in Condition 3.3.41. This test shall also be used to determine and/or update operating ranges for pressure drop, scrubbant liquid flowrate and pH on this Venturi Scrubber. [Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

4.2.18 Following the initial performance test required per Condition 4.2.11, the Permittee shall conduct a performance test for Sulfur Dioxide (SO₂) emissions on the No. 5 Recovery Furnace, once every 5 years, to demonstrate compliance with the SO₂ limit in Condition 3.3.36. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

4.2.19 Following the initial performance test required per Condition 4.2.13, the Permittee shall conduct a performance test for Sulfur Dioxide (SO₂) emissions on the No. 6 Recovery Furnace, once every 5 years, to demonstrate compliance with the SO₂ limit in Condition 3.3.37. [40 CFR 52.21 Avoidance, Compliance with Georgia Regional Haze State Implementation Plan subsumed, 40 CFR 51.308]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

...

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

...

Power Boilers PB01, PB02 and PB03, and No. 5 and No. 6 Recovery Furnaces

xxx. Any twelve consecutive month period during which the combined quantity of No. 6 fuel oil combusted in Power Boilers PB01, PB02 and PB03 exceeds 7,423,500 gallons.

Title V Permit

...

xxxii. Any twelve consecutive month period during which the SO₂ emissions from Power Boiler PB03 are in excess of 149 tons per year.

...

xxxv. Any twelve consecutive month period during which the quantity of fuel oil combusted in Power Boiler PB02 exceeds 1,303,050 gallons.

Wastewater Treatment Plant

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)

No. 1, 2, and 3 Power Boilers

i. For the operating parameters established for the power boiler scrubbers:

C. Any three consecutive 1-hour periods during which the average pressure drop, scrubbant flow rate across and/or the pH for the No. 3 Power Boiler Venturi Scrubber (APCD Code PBC9) is below the following (or the last complying performance test result):

I. Pressure Drop: 10.6 inches of water

II. Scrubbant flow rate: 1060 gpm

III. pH: 10 (and/or determined per performance test in Condition 4.2.17)

6.2.3 The Permittee shall record and maintain daily operating records for the No. 1, 2, and 3 Power Boilers. These daily records shall include the type(s) of fuel(s) burned, the quantity of fuel(s) burned, and the quantity of steam produced.[391-3-1.02(2)(g)]

6.2.29 The Permittee shall use the usage records required by Condition 6.2.3 to determine the total combined amount of No. 6 fuel oil fired in Power Boilers PB01, PB02 and PB03 for each month and each twelve consecutive months period. This record keeping condition shall be used to demonstrate compliance with Condition 3.2.4.

6.2.30 The Permittee shall use AP42 (or Division approved) emission factors and the usage records required by Condition 6.2.3 for all fuels (i.e. landfill gas, natural gas, wood bark or fuel oil) fired in Power Boiler PB03 to determine SO₂ emissions for each month and each twelve consecutive months period. This record keeping condition shall be used to demonstrate compliance with Condition 3.2.5.

6.2.31 The Permittee shall use the usage records required by Condition 6.2.3 to determine the total amount of fuel oil fired in Power Boiler PB02 for each month and

each twelve consecutive months period. This record keeping condition shall be used to demonstrate compliance with Condition 3.2.6.

Permit Conditions for Southern States Phosphate and Fertilizer

Permit No. 2819-051-0077-V-02-1, effective March 4, 2008

Emissions Unit

- Sulfuric Acid Plant 2

3.3.1 The Permittee shall not discharge or cause the discharge into the atmosphere from Acid Plant No. 2 (Source Code SA02), sulfur dioxides (SO₂) emissions in amounts equal to or exceeding 580 tons during any 12 consecutive month period effective January 1, 2014. [Compliance with Georgia Regional Haze State Implementation Plan, 40 CFR 51.308]

Permit No. 2819-051-0077-V-02-0, effective February 3, 2005 (existing monitoring to be used to show compliance with new condition, above)

5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Sulfur dioxide emissions (in ppm) from Sulfuric Acid Plant 1 and Plant 2 (Source Codes SA01 and SA02).

Draft Permit Conditions for Georgia-Pacific Corporation- Cedar Springs Operation

3.2 Equipment Emission Caps and Operating Limits

[Modified Permit Condition]

Recovery Boiler No. 3

3.2.6 Upon completion of the BART project, the Permittee shall not discharge or cause the discharge into the atmosphere from Recovery Boiler No. 3 (Source Code R402) any gases which contain:

- c. Sulfur dioxide emissions in excess of 350 ppm on a dry basis corrected to 8 percent oxygen as a 24-hour average when firing black liquor solids [40 CFR Part 51 Appendix Y-BART]

[New Permit Condition]

Power Boilers No. 1 and No. 2

3.2.19 Upon completion of the BART project, the Permittee shall abide by the following emission limits:

[40 CFR 51.308(e)]

a. The Permittee shall not discharge or cause the discharge into the atmosphere from Power Boiler No. 1 and Power Boiler No. 2 any gases that contain sulfur dioxide (SO₂) exceeding 135 pound per hour each averaged over a 24 hour period.

4.2 Specific Testing Requirements

[New Permit Conditions]

4.2.26 Within 90 days of the completion of the BART Project, the Permittee shall perform an initial compliance test on Power Boilers No. 1 and 2 to determine compliance with the limits specified in Condition 3.2.19 and also establish the excursion limits for pH of the scrubbing solution to meet the limits specified in Condition 3.2.19. The RATA test and the performance test shall be performed simultaneously. The compliance with the emission limits in condition 3.2.19 will be demonstrated using continuous 24 hour of CEMS data, the first hour starting with the first hour of RATA testing.

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

4.2.27 Within 90 days of the completion of the BART Project, the Permittee shall perform an initial compliance test on Recovery Boiler No. 3 (Source Code R402) to determine compliance with the limits specified in Condition 3.2.6. The RATA test and the performance test shall be performed simultaneously. The compliance with the emission limits in condition 3.2.6 will be demonstrated using continuous 24 hour of CEMS data, the first hour starting with the first hour of RATA testing.

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

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

[Modified Permit Condition]

5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

c. Opacity, TRS, sulfur dioxide and oxygen from Recovery Boiler No. 3 (Source Code R402).

The requirement for the installation of a continuous monitor for sulfur dioxide will be effective on the date of the completion of the BART project [40 CFR Part 51, 40 CFR 63 Subpart MM; 40 CFR 63.864(d); Georgia Rules 391-3-1-.02(2)(b) and 391-3-2-.02(2)(gg)]

[Modified Permit Condition]

5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [Georgia Rule 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

d. Pressure drop, pH and scrubbant flow rate from the scrubbers on Power Boiler No. 1 and No. 2 (Source Codes U500 and U501).

The requirement for the measurement of pH will be effective on the date of the completion of the BART project.
[391-3-1-.02(2)(d)].

[Modified Permit Condition]

5.2.19 The following pollutant specific emission units (PSEUs) are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
Lime Handling System (Group Code LEG2)	PM
Power Boiler Nos. 1 and 2 (Source Codes U500 and U501)	PM, SO ₂
Lime Kiln Nos. 1 and 2 (Source Codes L600 and L601)	PM
Recovery Boiler Nos. 1 and 2 (Source Codes R400 and R401)	PM
Recovery Boiler No. 3 (Source Codes R402)	PM
Smelt Dissolving Tank Nos. 1, 2, and 3 (Source Codes R404, R405, and R406)	PM
Incinerator / Scrubber System (Source Code R425)	PM, SO ₂

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9.
[40 CFR 64]

[Modified Permit Condition]

5.2.21 The Permittee shall comply with the performance criteria listed in the table below for the particulate matter and sulfur dioxide emissions from Power Boiler Nos. 1 and 2 (Source Codes U500 and U501):
[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Scrubbant Flow Rate	Indicator No. 2 Pressure Drop Across Scrubber	Indicator No. 3 PH of Scrubbing Media
A. Data Representativeness [64.3(b)(1)]	The flow rate is measured using standard instrumentation provided for this purpose.	The differential pressure across the scrubber will be measured using standard instrumentation provided for this purpose.	Continuous monitoring of scrubbant pH.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	N/A	N/A	N/A
C. QA/QC Practices and Criteria [64.3(b)(3)]	Annual Calibration	Annual Calibration	Annual Calibration
D. Monitoring Frequency [64.3(b)(4)]	Continuous	Continuous	Continuous
E. Data Collection Procedures [64.3(b)(4)]	Recorded by the mill data collection system.	Recorded by the mill data collection system.	Recorded by the mill data collection system.
F. Averaging Period [64.3(b)(4)]	3-hour average	3-hour average	3-hour average

[New Permit Condition]

5.2.29 For sulfur dioxide CEMS installed on Recovery Boiler No.3 (Source Code R402) the Permittee shall perform annual RATA tests, quarterly accuracy determinations, and daily CEMS drift checks in accordance with the following procedures and requirements:
[Georgia Rule 391-3-1-.02(6)(b) (vi)]

a. A Relative Accuracy Test Audit (RATA) shall be conducted on the CEMS at least once every four successive operating quarters. The procedures of Appendix F of 40 CFR Part 60 shall be used to conduct the RATA. The results of a RATA shall be submitted to the Division within 60 days of completion of the RATA.

b. A cylinder gas audit shall be conducted at least once every quarter in accordance with Appendix F of 40 CFR 60.

c. CEMS drift checks shall be conducted daily in accordance with 40 CFR 60.13(d).

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

[Modified Permit Condition]

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)]

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)

Recovery Boilers No. 3

xv. Upon completion of the BART project, the Permittee shall abide by the following :

For Recovery Boiler No. 3 (Source Codes R402), any 24-hour period during which the SO₂ concentration, expressed as the arithmetic average of 24 contiguous 1-hour periods, measured and recorded in accordance with 5.2.1.c is in excess of 350 ppm on a dry basis corrected to 8 percent oxygen when firing black liquor only.

[40 CFR 51.308(e)]

Power Boilers No. 1 and 2

xvi. Upon completion of the BART project, the Permittee shall abide by the following:

For Power Boiler No. 1 and 2 (Source Codes U500 and U501), any 24-hour period during which the SO₂ concentration, expressed as the arithmetic average of 24 contiguous 1-hour periods, measured and recorded in accordance with 5.2.1.b and calculated in accordance with Conditions 6.2.18 exceed 135 lbs per hour.

[40 CFR 51.308(e)]

- 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)

Power Boilers No. 1 and No. 2

- viii. Upon completion of the BART project, the Permittee shall abide by the following

Any three consecutive 1-hour periods during which the pH measured and recorded in accordance with Condition 5.2.2.d for either scrubber on Power Boiler No. 1 or No. 2 (Source Codes U500 and U501) fall below the values established during the performance test required by condition 4.2.26.
[40 CFR 51.308(e)] and Georgia Rule 391-3-1-.02(2)(d)1(ii)]

6.2 Specific Record Keeping and Reporting Requirements

[New Permit Conditions]

- 6.2.47 The Permittee shall submit the actual date of the completion of the BART Project. This submittal shall include certification that a final inspection has shown that the BART Project was completed in accordance with Application No.18385. This notification shall be submitted within 15 days following the completion of the BART Project.
[Georgia Rule 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.48 At the end of each calendar month and while Power Boiler No. 1 and Power Boiler No. 2 (Source Code U500 and 501) is subject to Condition 3.3.19, the Permittee shall calculate and record both monthly emission totals and twelve-month rolling emission totals for sulfur dioxide (SO₂) using the daily results of Condition 6.2.18. When a monthly emission total exceeds 49.27 tons for SO₂ for any of the Power Boilers, the Permittee shall submit a statement indicating how the Permittee intends to meet the applicable limit(s) specified in Condition 3.3.19; this statement shall be submitted by the 30th day of the following calendar month. Records of all monthly and twelve-month rolling emission totals, records of demonstration calculations, records of any factors used in the calculation of criteria pollutant emissions, and other supporting documentation shall be maintained. These records shall be kept available for inspection by or submittal to the Division for a period of five years following the date of record.
[Avoidance of 40 CFR 52.21, 40 CFR 51.308(e)]

7.14 Specific Conditions Associated with this Amendment

[New Permit Condition]

- 7.14.1 The scrubber modification for Power Boilers 1 and 2 and repairs to the concentrators sets (BART project) along with all changes identified in Condition 1.3 to comply with BART shall be completed by July 30, 2011.

