

Facility Name: **Georgia-Pacific Gypsum LLC - Savannah Plant**
City: Savannah
County: Chatham
AIRS #: 04-13-051-00019

Application #: TV-590155
Date Application Received: October 22, 2021
Permit No: 3275-051-0019-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

Georgia-Pacific Gypsum LLC - Savannah Plant.

2. Parent/Holding Company Name

Georgia-Pacific Gypsum LLC.

3. Previous and/or Other Name(s)

The facility was previously known as Domtar Gypsum. In 1996 Georgia Pacific acquired it. Title V permit No. 3275-051-0019-V-02-0 referred to it as G-P Gypsum Corp. - Savannah Plant and permit amendment No. 3275-051-0019-V-02-2 changed its name to Georgia-Pacific Gypsum LLC.

4. Facility Location

151 Wahlstrom Road
Savannah, Georgia 31404 (Chatham County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in Savannah, which is designated as an attainment area for all criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3275-051-0019-V-04-0	April 26, 2017	Title V Renewal
26758	October 9, 2018	Installation of an edge cooling system in Zone Nos. 1 and 2 of the Board Dryer (EU13) to provide for more uniform distribution of both hot and cool air.

27025	March 22, 2019	Installation of Paint Coaters #1 and #2 (EU31 and 32), replacement of the Crusher Transfer Conveyor, and replacement of Ball Mill #6.
27324	November 25, 2019	Changes to the Paint Line Board Feeder Baghouse (EU27) exhaust flow rate and addition of natural gas-fired burners for the Paint Line Preheater, Paint Line Oven #1, and Paint Line Oven #2 (EU28, EU29, and EU30, respectively) as well as installation of a new Paint Line Inline Saw (EU39).
27333	December 6, 2019	Replacement of the Riser Saw (0008) with a new multi-blade saw and replacement of the fan that provides flow from the Riser Saw to the End Trim baghouse (EBH1) or the spare unit (SABH) with a smaller capacity unit.
	May 18, 2020	Installation of an inkjet printer as part of the Paint Line operation.
27905	March 23, 2021	Replacement of the shear assembly, glue application equipment, and riser cube scissor lift table of the Dunnage/Riser Saw (0008) and removal of the Cutback Saw (1007) from service.

D. Process Description

1. SIC Codes(s)

3275.

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility makes gypsum wallboards.

3. Overall Facility Process Description

Rock Delivery and Stucco Conversion from Raw Gypsum

The major raw material for gypsum wallboard is gypsum rock. The rock is mined offsite and brought by ship to the plant where it is loaded into feed hoppers. The Savannah Gypsum Plant also has the capability to process synthetic or Flue Gas Desulfurization (FGD) gypsum. Additionally, this facility is capable of recycling wallboard that is considered "off-specification" by Georgia-Pacific or its customers. The delivery vessels unload the gypsum rock material into one of four hoppers (F101, EU160, EU162, and EU164), which then transfer the material to an outdoor storage pile (F003) via conveyors (EU161, EU163, EU165, F102, F103, F107, F146, and F109). The

gypsum rock drops into an underground hopper (F301) that feeds an underground conveyor (F104), leading to an aboveground conveyor (F106). Recycled wallboard material can be added to the conveyor using a hopper (F108) and weigh belt (F110). The material is then dropped into an indoor Crusher (EU02) where it is reduced for the next step of conversion. The crushed and sized material can be conveyed to one of two production lines. Material to be processed in Line 1 is conveyed to a rock storage bin (0313). The majority of Line 1 equipment is currently idled. Material to be processed in Line 2 is transferred by a conveyor (CB05) to a storage bin (EU03) or is transferred to a bypass conveyor (CB06). From the storage bin or bypass conveyor, it is conveyed to a bin (EU04) for processing through the Claudius Peters (CP) Mill system (EU06). The Stucco conversion process consists of a feed bin (EU04) and CP Mill (EU06), which dries, grinds, and calcines the gypsum all in one operation. The CP Mill is followed by a rotary screen (F112) and is then sent to an air slide conveyor (F155) or to a rotary drum cooler (F113) and then an air slide conveyor (F154). Material from the air slide conveyors is then sent to The East Stucco Bin (#3) or West Stucco Bin (#4) (EU07 and EU08). Stucco re-hydration in the wallboard manufacturing process requires un-calcined gypsum, or landplaster, to be added into the wet mixture to re-hydrate the stucco so that it can harden to make the drywall. Landplaster is created by using the raw rock and drying and grinding it in Raymond Mill No. 1 with Flash Dryer (0401). Then, it is stored in a land plaster bin (0403). Landplaster from Land Plaster Bin No. 1 (0403) is transferred to a bin (EU18) and mixer (F139) and then stored in a bin (F138).

Wallboard Manufacturing

The board forming process begins with the stucco circulation and feed system. Stucco from the CP Mill (EU06) is conveyed into Stucco Bins #3 (EU07) or #4 (EU08) and may be further ground, then metered through the mixing screw, along with other additives, into the Pin Mixer (EU12). Additives are metered out of storage bins onto covered collection belts (CB10 and CB11) that drop material into a screw conveyor that flows into the Pin Mixer where a slurry mixture is created. The wet slurry flows from the Pin Mixer between a face and back substrate to form the continuous line of wallboard. Wallboard travels along the length of the line to the knife point, and then into the Board Dryer (EU13). Prior to entering the dryer, barcodes or other information may be applied on the wallboard at ink printing stations (F118). The board hardens in the continuous line board dryer after which the boards are stacked (EU14) and the bundles are cut (EU16) to their final length. Wallboard can also be used for riser/ dunnage production, using the Riser/Dunnage Saw (0008). Finished drywall may also be sent through a paint line process that includes ovens (EU28, EU29, and EU30), roll coaters (EU31 and EU32), and an ink jet printer.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a minor source with respect to the *Prevention of Significant Deterioration* (PSD).

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				✓
H ₂ S				✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

VOC and HAP result from evaporation of volatile organic constituents of surfactants, glues, silicone, inks, additives and paint used throughout the manufacturing process. Condition 2.1.2 restricts the emissions of any single HAP to 10 tons per year and a combination of HAPs to 25 tons per year. The facility is not subject to any proposed or final 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants (NESHAP)*, standard.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	yes
Program Code M – Part 63 NESHAP	no
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Conditions 2.1.1 and 2.1.2 limit volatile organic compounds (VOC) and hazardous air pollutants (HAPs) emissions.

B. Applicable Rules and Regulations

Condition 2.2.1 addresses 40 CFR 60 - Subpart A General Provisions, *New Source Performance Standards* (NSPS).

C. Compliance Status

Application No. TV-590155 indicates the facility is operating in compliance with the rules and regulations.

D. Permit Conditions

Conditions 2.1.1 and 2.1.2 are meant to avoid 40 CFR 52.21, *Prevention of Significant Deterioration of Air Quality* and 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants*, respectively. Condition 2.2.1 refers to the applicability of the *General Provisions* of the federal *New Source Performance Standards* (NSPS).

III. Regulated Equipment Requirements

A. Equipment List for the Process

Georgia-Pacific Gypsum LLC - Savannah Plant requested removing emission units that were permanently shutdown or never installed. The Company, also, requested adding emission units that were added during the permit term, identified through this renewal process, and/or controlled by a baghouse associated with a significant emission unit. Therefore, Table 3.1 and Attachment B, insignificant emission units/activities, were updated accordingly.

Specifically: Application No. TV-590155 mentions that the following emission units are being removed from the permit as the equipment has been permanently shutdown or was never installed: Land Plaster Bin No. 2 (0404), Land Plaster Bin No. 3 (0405), Cutback Saw (1007), Rock Bin No. 2 (0314), Raymond Mill No. 2 with Dryer (0402), Byproduct Belt Conveyor No. 1 (F149), Kettle Hot Pit No. 1 (0701), Kettle Burner No. 1 (0702), Kettle Hot Pit No. 2 (0703), Kettle Burner No. 2 (0704), Kettle Hot Pit No. 3 (0705), Kettle Burner No. 3 (0706), Kettle East Stucco Bucket Elevator No. 1 (0801), Kettle West Stucco Bucket Elevator No. 2 (0802), Kettle Stucco Reject Bin (0803), Kettle Stucco Reject Elevator (0804), Kettle Stucco Rotary Screen (0805), Kettle Stucco Recirculating Elevator (0809), 10 Ton Bin (0810), Stucco Conditioning Chamber (F114), Impact Mill (F115), #1 - #4 Substrate Heaters (EU20), Curtain Coater (F119), Logo Printing Station (F136), Coating Sprayers (F137), Line #2 Hand Paint Station (EU15), Manual Bulk Stucco Loading System (F153), CNC Machine (EU38), End Trim Filter Receiver (ETFR).

Also, Georgia-Pacific Gypsum LLC - Savannah Plant proposed that the following emission units be added to the table in Section 3.1. These emission units were added during the permit term, identified through this renewal process, and/or are controlled by a baghouse associated with a significant emission unit: Paint Line Inline Saw (EU39), Multicor Metering System (0813), Paint Line Board

Feeder (EU27), Rotary Drum Stucco Cooler (F113), and Stucco Metering System (F117). Moreover, GP proposed changes to the source description for the following emission units to be consistent with plant nomenclature: CB09 – Calcine Feed Elevator Conveyor, EU18 -LP Storage Bin (#2), EU16 – Board Sawing and Bundling. GP proposed that the Kettle Baghouses (KBH1, KBH2, and KBH3) be removed from the permit as a control device for Land Plaster Bin No. 1 (0403). Furthermore, the Insignificant Activities Checklist was updated to reflect the quantity of different activities/unites at the site.

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
0403	Land Plaster Bin No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	
0008	Dunnage/Riser Saw	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	EBH1 or SABH	Baghouse
F102	Ship Unloading Transfer Conveyor No. 1	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F103	Ship Unloading Transfer Conveyor No. 2	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F104	Rock Transfer Conveyor No. 1	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F107	Ship Unloading Transfer Conveyor No. 3	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F109	Tripper Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
EU161 EU163 EU165	Dock Discharge Conveyors No.1, No. 2, and No.3	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F146	Ship Unloading Transfer Conveyor No. 4	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F106	Crusher House Feed Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	CBBH	Baghouse
EU02	Rock Crusher	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	CBBH	Baghouse
CB04	Crusher Discharge Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	CBBH	Baghouse
F111	Crusher Transfer Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	CBBH and RBB2	Baghouses (at transfer points)
F110	Recycle Weight Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
EU03	400 Ton Rock Bin	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
CB05	Calcining Feed Conveyor (to 400 ton bin)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
CB09	Calcine Feed Elevator Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
CB10	Dry Additives Collecting Belt No. 1	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
CB11	Dry Additives Collecting Belt No. 2	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
CB06	Rock Bin Bypass Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
F312	#7 Rock Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
0313	Rock Bin No. 1	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
EU04	60 Ton Rock Feed Bin	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
EU05	Calcining Feed Elevator	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
CB08	Rock Elevator Collecting Conveyor	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	RBB2	Baghouse
F154	Air Slide	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CPBH	Baghouse
F155	Cooler Bypass Air Slide	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CPBH	Baghouse
EU06	CP Mill	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	CPBH	Process Baghouse
F112	CP Mill Rotary Screen	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	CPBH	Baghouse
0401	Raymond Mill No. 1 with Dryer	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 64	RBH1	Baghouse
0502	Byproduct Belt Conveyor No. 2	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	WMBH	Baghouse
0503	Byproduct Indoor Hopper Feeder	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	WMBH	Baghouse
0504	Byproduct Mill with Heater and Cyclone	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 64	WMBH	Baghouse
0505	Byproduct Rotary Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
EU07	East Stucco Bin (# 3)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SBH1	Bin Vent Filter
EU08	West Stucco Bin (# 4)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SBH2	Bin Vent Filter

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
EU09	West Stucco Elevator	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
EU10	East Stucco Elevator	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
0806	Stucco Bin No. 1 (Line 1 East)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	STBH	Baghouse
0807	Stucco Bin No.2 (Line 1 West)	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	STBH	Baghouse
0808	Kettle Stucco Supply Elevator	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	STBH	Baghouse
F116	Stucco Rotary Screen (Line 2)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
F134	BMA Bin (# 9)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
F138	BMA Pre-Grind Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	None	
EU18	LP Storage Bin (#2)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	LPB2	Bin Vent Filter
EU12	Pin Mixer # 2	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SSBH	Baghouse
EU11	Upper & Lower Substrate Splicers (Line 2)	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	PBH2	Baghouse
EU13	3-Zone Board Dryer [(Line 2) with burners]	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	None	
EU31	Paint Coater # 1	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	
EU32	Paint Coater # 2	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	
F118	Ink Printing Station	40 CFR 52.21 Avoidance 40 CFR 63 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	
F120-F125	Regrinding Ball Mill Nos. 1 – 6 (Line 2)	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
EU16	Board Sawing and Bundling	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	EBH2 or SABH	Baghouses
EU17	BMA Bucket Elevator	40 CFR 52.21 Avoidance 40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	SSBH	Baghouse
FOT1	No. 2 Fuel Oil Storage Tank (East)	40 CFR 52.21 Avoidance	None	

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
FOT2	No. 2 Fuel Oil Storage Tank (West)	40 CFR 52.21 Avoidance	None	
EU39	Paint Line Inline Saw	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	EBH2 or SABH	Baghouse
0813	Multicor Metering System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SSBH	Baghouse
EU27	Paint Line Board Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	PLBH	Baghouse
F113	Rotary Drum Stucco Cooler	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CPBH	Baghouse
F117	Stucco Metering System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SSBH	Baghouse
F126	Stucco Surge Bin/Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CPBH	Baghouse

B. Equipment & Rule Applicability

Emission and Operating Caps:

The limits in Section 3.2, of Title V permit No. 3275-051-0019-V-04-0, are being carried over in the enclosed Title V renewal permit. Georgia-Pacific Gypsum LLC - Savannah Plant had those limits placed to either avoid some of the requirements of 40 CFR 52.21, *Prevention of Significant Deterioration (PSD)*.

Rules and Regulations Assessment:

In addition to the State rules, the most prominent of which are summed up in Section 3.4 of the enclosed permit, some of the equipment in this plant is subject to 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*.

C. Permit Conditions

Georgia-Pacific Gypsum LLC - Savannah Plant has not made significant changes since Title V renewal permit No. 3275-051-0019-V-04-0 was issued, on April 26, 2017. However, Georgia-Pacific Gypsum LLC requested updating the language of Conditions 5.2.5, 5.2.6, 6.2.2, and 6.2.3. Some of those changes were made where “better wording” is warranted. Other than this, the conditions of Title V permit No. 3275-051-0019-V-04-0 were carried over to the enclosed permit.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Required initial performance tests have been completed. However, the enclosed permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment and Condition 4.2.1 is meant to require initial performance test be performed in accordance with 40 CFR 60.8 and the applicable NSPS Subpart. Condition 4.2.2 addresses required repeat performance testing according to 40 CFR 60.11 and 40 CFR 60.675.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

No new monitoring conditions are being added in the enclosed Title V Renewal Permit.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. Each emission unit controlled by a control device that *"has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source,"* as defined by 40 CFR §64.2(a)(3) is subject to CAM.

Title V renewal Application No. 590155 contained a revised CAM applicability analysis. As a result of the analysis, Georgia-Pacific requested to removing the Kettles and associated Hot Pits (0701, 0703, and 0705), Land Plaster Bins Nos. 2 and 3 (0404 and 0405), Raymond Mill #2 (0402), and the Cutback Saw (1007) from the permit; these units have been permanently removed from service. In addition, the Land Plaster Bin No. 1 (0403) and Stucco Bins #1 and #2 (0806 and 0807), which are reflected as subject to CAM in the current permit, each has pre-controlled emissions less than the 100 tpy major source threshold). As such, Georgia-Pacific requested that these units be removed from Condition 5.2.9 of the permit. CAM was, also, added for the Paint Line Inline Saw (EU39) and Board Sawing and Bundling (EU16) for particulate matter.

Except for the above-mentioned, the CAM Conditions of Permit No. 3275-051-0019-V-04-0 are being carried over in the enclosed Title V renewal.

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

None is being added to in the enclosed Title V Renewal Permit.

VII. Specific Requirements**A. Operational Flexibility**

Conditions 7.1.1 and 7.2.1 contain general operational flexibility provisions.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None applicable (Current Condition 7.5.1 has been removed to avoid redundancy with the Conditions in Sections 7.1 and 7.2).

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None associated with the enclosed permit.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//