

Facility Name: **Pratt Paper (GA), LLC**
 City: Conyers
 County: Rockdale
 AIRS #: 04-13-247-00037

Application #: TV-63787 and TV-63682
 Date Application Received: August 2, 2017
 Permit No: 2631-247-0037-V-04-0

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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: Pratt Paper (GA), LLC
2. Parent/Holding Company Name: Pratt Industries (U.S.A.), Inc.
3. Previous and/or Other Name(s):
Visy Paper, Inc.
Jet Corr, Inc.
Jet Corr II, Inc.
4. Facility Location - The facility is located at 1800A Sarasota Parkway, Conyers, Georgia 30013, in Rockdale County.
5. Attainment, Non-attainment Area Location, or Contributing Area - The facility is located in a attainment area for ozone. Rockdale County previously was non-attainment for ozone, but was classified to maintenance as of June 2, 2017 for the 8-hour ozone standard.

B. Site Determination

Pratt Paper (GA), LLC (AFS No. 247-00037) is comprised of what was three previously separately permitted facilities - Visy Paper, Inc. (AFS No. 247-00037), Jet Corr, Inc. (AFS No. 247-00047), and Jet Corr II, Inc. (AFS No. 247-00052). Jet Corr and Jet Corr II both manufacture corrugated paper sheets (SIC code 2679) while Visy Paper produces recycled linerboard and medium paperboard (SIC code 2631). These three facilities were considered one Part 70 source because they were under common control, located on contiguous and/or adjacent property, and have the same 2-digit SIC code. They are owned and managed by Pratt Industries (U.S.A.), Inc. Visy Paper and Jet Corr are located in adjacent and internally connected buildings located on the same property at 1800A Sarasota Parkway, Conyers, Georgia. Jet Corr II's equipment and processes were moved to Jet Corr and its Title V permit was revoked.

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
VISY PAPER, INC.		
2631-247-0037-V-03-0	January 31, 2013	Title V Permit Renewal issued to Visy Paper, Inc.
2631-247-0037-V-03-1	June 24, 2016	502(b)(10) Modification to add a new corrugating facility, including the installation of a new 20.92 x 10 ⁶ Btu/hr natural gas-fired boiler.

2631-247-0037-V-03-2	July 9, 2019	Minor modification without construction to revise each 100 tpy CO, NO _x , and SO ₂ facility-wide cap to exclude the emissions of the 20.92 x 10 ⁶ Btu/hr Hurst Boiler and the 29.4 x 10 ⁶ Btu/hr Cleaver Brooks Boiler.
JET CORR, INC.		
2679-247-0047-V-04-0	January 31, 2013	Title V Permit Renewal issued to Jet Corr, Inc.
2679-247-0047-V-04-1	October 18, 2016	502(b)10 Modification to include the JC03 Boiler from Jet Corr II.
2679-247-0047-V-04-3	June 13, 2017	Significant Modification with construction for the installation and operation of a new flexo folder gluer and revisions to the VOC emissions group. This permit revoked Permit Number 2679-247-0047-V-04-2.
Off-Permit Change	January 22, 2018	To install a Fulton Model 50 Hp natural gas-fired boiler to replace the existing 50 Hp Hurst Boiler (ID No. JC04)
2679-247-0047-V-04-4	May 11, 2018	Minor Modification with construction for the construction and operation of a new Marten 3-color Rotary Die Cutter and removal of decommissioned and/or site-cleared equipment from the permit
2679-247-0047-V-04-5	July 29, 2019	Minor modification with construction to revise each 100 tpy CO, NO _x , and SO ₂ facility-wide cap to exclude the emissions of the 20.92 x 10 ⁶ Btu/hr Hurst Boiler and the 29.4 x 10 ⁶ Btu/hr Cleaver Brooks Boiler and expanding the Jet Corr operations with the addition of a new corrugator, a natural gas fired 29.4 x 10 ⁶ Btu/hr Cleaver Brooks Boiler, a 4-color Ward 50-inch Flexographic Printer Folder Gluer, a 4-color Ward 37-inch Flexographic Printer Folder Gluer, a 4-color Bobst 8.30 33-inch Flexographic Printer Folder Gluer, two 4-color Ward 66-inch Rotary Die Cutters, and a trim collection system
*2679-247-0052-V-03-0	July 17, 2015	Title V Permit Renewal Jet Corr II, Inc. – revoked by NPR on October 18, 2016. *Equipment was moved to Jet Corr facility, so it is still included in this permit renewal.
Off-Permit Change	January 21, 2021	Like-kind replacement of FM18, increase of 0.26 tpy VOC. Updating 29.4 X 10 ⁶ Btu/hr Cleaver Brooks boiler to 37.12 MMBtu/hr boiler (permitted at 700 hp and 900 hp was actually installed). Increase in emissions at 1.04 tpy NO _x .

D. Process Description

1. SIC Codes(s)

2679 – Converted Paper and Paperboard Products

2631 – Paperboard Mills

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 manufactures corrugated paper and corrugated boxes, as well as paperboard from waste paper.

3. Overall Facility Process Description

Visy Paper, Inc. manufactures paperboard from waste paper. The manufacturing process begins by "slushing" the waste paper in hot water to break the waste into fibrous paper stock. The stock is then washed, screened, and separated from impurities. Next, the stock is treated with conditioners and delivered to the head box of the paper machine. At the head box, the stock is sprayed onto a forming fabric, compressed into shape, and then transferred to a felt. While being conveyed by the felt, the stock is dried by heated nips, dyed, and then dried again. At the end of the process, the finished paperboard is removed from the felt, rolled, and cut. The final product is either sold to the customers or distributed to Jet Corr, Inc., which is located next door.

Jet Corr receives rolls of paper from Visy Paper and converts the rolls into corrugated sheets on a Corrugator (ID No. JC02) through the use of a starch-based adhesive. Three sheets of paper are joined by fluting the center sheet, applying starch to the tips of the flutes, and then adding the outside sheets by applying pressure and drying the adhesive. The product is trimmed and cut to size. The trim is recovered, baled, and recycled into the paper making process. The corrugated sheets are either packed for shipping or are converted into boxes for delivery to clients. The boxes are manufactured using flexo folder gluers and rotary die cutters. The facility also operates equipment for the printing and manufacturing of displays under the name Pratt Displays, a sub-division of Jet Corr, Inc.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Pratt Paper (GA), LLC was a major source for purposes of Non-Attainment Area New Source Review (NAA-NSR) applicability because the combined potential emissions of NO_x and VOC exceeded 25 tons per year (tpy) each, which was the threshold at the time of construction. Before Jet Corr was constructed in 1998, NO_x emissions had been limited below 50 tpy from Visy Paper. Although the combined NO_x emissions from Visy Paper and Jet Corr exceed 50 tpy now, the combined source has not undergone a NAA-NSR because the addition of Jet Corr was not a major modification itself. This limit had made Visy Paper a synthetic minor source under NAA-NSR (until Jet Corr was added) and a NAA-NSR had been avoided.

The combined source is one of the 28 named source categories because of the two large boilers (over 250 MMBtu/hr combined) located at Visy Paper. The combined source is a major source under Prevention of Significant Deterioration (PSD) because the combined potential to emit (PTE) for CO exceeds 100 tpy. CO emissions from Visy Paper are limited below 100 tpy. Removal of this condition will result in a retroactive PSD review for the entire source.

Pratt Paper has previously accepted the following limits with regard to PSD/NSR:

- CO and SO₂ emissions from the entire Part 70 site are limited to less than 100 tpy in order to avoid PSD review. This was due to the addition of the Alternative Fuels Power Island (henceforth called Biomass Boiler, ID No. PI01).
- NO_x emissions from the entire Part 70 site are limited to less than 100 tpy in order to comply with Best Available Control Technology (BACT) analysis for modifications instead of Lowest Achievable Emission Rate (LAER) analysis per Georgia Rule 391-3-1-.03(8)(c)13(iii). This was due to the addition of the Biomass Boiler.
- NO_x emissions from the original Visy Paper facility are limited to less than 50 tpy in order to avoid NAA-NSR. Although the combined sources emissions are greater than 50 tpy, the addition of the Jet Corr I and II facilities were not major in and of themselves. Removal of this condition would result in a retroactive NAA-NSR.
- VOC emissions from the Biomass Boiler are limited to less than 10.8 tons during any consecutive 12-month period as Reasonably Available Control Technology (RACT) to avoid triggering NAA-NSR.
- NO_x emissions from the Biomass Boiler are limited to less than 0.07 lb/MMBtu (30-day rolling average) as BACT under NAA-NSR.
- The Nebraska Boiler (ID No. VP01) is limited to an annual capacity factor of 10% or less for No. 2 fuel oil in order to avoid a PSD review.

- VOC emissions from Equipment FM01, FM12, FM17, FM22, FM24, FM15, FM18, FM19, and FM20 are limited to equal to or less than 15.31 tons during any consecutive 12-month period.
- VOC emissions from Equipment FM23 are limited to equal to or less than 11.03 tons during any consecutive 12-month period.
- NO_x emissions from the Nebraska Boiler (ID No. VP01) were limited to 4.0 tons during any consecutive 12-month period as an internal reduction taken as part of the emission reduction credits (ERCs) taken at the time of construction for the PI01 Boiler. EPD inadvertently removed this limit in Renewal Title V Permit No. 2631-247-0037-V-03-0 in November 2012 but did not remove the associated reportable limit in Condition 6.1.7.b or the calculation in Section 6.2. Over time, the emissions from this boiler exceeded 4.0 tons during a consecutive 12-month period. Once it was brought to attention in October 2019, the facility pursued additional ERCs (ERC Certificate No. ERC-0122-NO_x) and the new limit is established at 17.04 tons during any consecutive 12-month period, using the time-period appropriate off-set ratio of 1.3. This includes the previous 4.0 tons, plus 1.5 tons left over from a previous ERC, and the balance from this new ERC purchase.

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	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes	✓		
CO	Yes	✓		✓
TRS	No			
H ₂ S	No			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The Pratt Paper (GA) Part 70 site is subject to a synthetic minor limit for individual and total HAP. Therefore, the site is therefore not subject to any major source MACT standards. However, the facility is an Area Source for HAP under 40 CFR Part 63 and is subject to 40 CFR 63 Subpart JJJJJ – “*National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*” for the Biomass Boiler (ID No. PI01).

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	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The entire Part 70 site accepted several emission caps in order to avoid PSD and NAA-NSR reviews and MACT applicability.

- The entire Part 70 site accepted an emissions cap of 10 tons of any single HAP and 25 tons of combined HAP per consecutive 12-month period. This limit is in place to avoid being subject to the requirements of 40 CFR 63 Subpart DDDDD – “*National Emission Standards of Hazardous Air Pollutants for Industrial-Commercial-Industrial Boilers and Process Heaters*” for the Biomass Boiler, as well as other existing boilers and heaters.
- The entire Part 70 site accepted emissions caps of 100 tons for CO and SO₂ per consecutive 12-month period. These limits are in place to avoid PSD review. It was determined in the most recent permitting actions for both Visy Paper and Jet Corr that boilers VP04 and JC06 (and any future equipment) should not be included in this site-wide limit. This renewal permit outlines the specific equipment that is subject to these limits.

- The entire Part 70 site accepted an emissions cap of 100 tons for NO_x per consecutive 12-month period. This limit was imposed to allow the Biomass Boiler to undergo BACT analysis instead of LAER analysis per Georgia Rule 391-3-1-.03(8)(c)13(iii). It was determined in the most recent permitting actions for both Visy Paper and Jet Corr that boilers VP04 and JC06 (and any future equipment) should not be included in this site-wide limit. This renewal permit outlines the specific equipment that is subject to this limit.
- The Part 70 site accepted a NO_x emissions limit from the original Visy Paper equipment that is limited to less than 50 tons per consecutive 12-month period in order to avoid NAA-NSR. It was determined in the most recent permitting action for Visy Paper that boiler VP04 (and any future equipment) should not be included in this site-wide limit. This renewal permit outlines the specific equipment that is subject to this limit.

B. Applicable Rules and Regulations

Georgia Rule 391-3-1-.02(2)(tt)1. requires the facility to have RACT in controlling VOC emission because the facility is located in Rockdale County, and the source-wide PTE for VOC exceeds 25 tpy. The use of 2-Butoxyethanol to remove stickies on the felt is the primary VOC source. Visy Paper submitted a VOC RACT plan in 1998 (updated September 2018). The Division approved Visy Paper's conclusions concerning VOC RACT. The facility agrees to handle, convey, and store the VOC based cleaners in a manner which minimizes the risk of spillage or volatilization.

C. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

D. Permit Conditions - The following table summarizes the changes to the permit conditions in this renewal permit. References to the original condition include shorthand for the different permits/amendments that are being combined into this renewal permit.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
Facility Wide Emission Caps and Operating Limits			
2.1.1	2.1.1	Visy V-3-0 JC V-04-0	Original MACT avoidance limit for 10/25 tpy HAP in order for the entire Part 70 site to avoid applicability to 40 CFR 63 Subpart DDDDD. Modified here to remove language “(defined as Visy Paper, Inc., Jet Corr, Inc., and Jet Corr II, Inc.)”
2.1.2	2.1.2	Visy V-03-0 Visy V-03-2 JC V-04-0 JC V-04-5	Original PSD avoidance limit of 100 tpy for CO emissions for the entire Part 70 site. However, it was determined that the VP04 and JC06 boilers should not have been included in the emissions cap. In an effort to minimize future permitting actions, the condition was modified in this action to reference all cap-applicable equipment listed in new Permit Condition 7.14.1, rather than continual modification to this condition to list excluded equipment.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
2.1.3	2.1.3	Visy V-03-0 Visy V-03-2 JC V-04-0 JC V-04-5	Original PSD avoidance limit of 100 tpy for SO ₂ emissions for the entire Part 70 site. However, it was determined that the VP04 and JC06 boilers should not have been included in the emissions cap. In an effort to minimize future permitting actions, the condition was modified in this action to reference all cap-applicable equipment listed in new Permit Condition 7.14.1, rather than continual modification to this condition to list excluded equipment.
2.1.4	2.1.4	Visy V-03-0 Visy V-03-2 JC V-04-0 JC V-04-5	Original PSD avoidance limit of 100 tpy for NO _x emissions for the entire Part 70 site. However, it was determined that the VP04 and JC06 boilers should not have been included in the emissions cap. In an effort to minimize future permitting actions, the condition was modified in this action to reference all cap-applicable equipment listed in new Permit Condition 7.14.1, rather than continual modification to this condition to list excluded equipment.
2.1.5	2.1.5	Visy V-03-0	Original NAA-NSR avoidance limit of 50 tpy for NO _x emissions for the Visy Paper site only. In an effort to streamline the permit, the condition was modified in this action to reference all cap-applicable equipment listed in new Permit Condition 7.14.2.

Visy = Visy Paper, V-03-0 = 2631-247-0037-V-03-0 permit; V-03-1, V-03-2 = subsequent permit amendments

JC = Jet Corr, V-04-0 = 2631-247-0047-V-04-0 permit; V-04-0, V-04-1, V-04-3, V-04-4, & V-04-4 = subsequent permit amendments

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
Visy Paper				
PI01	Biomass Boiler	40 CFR 51.165 40 CFR 52.21 40 CFR 60 Subpart Db 40 CFR 63 Subpart JJJJJ 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	PIC1 PIC2	Baghouse Sodium Bicarbonate Addition System
			-PIC4	NO _x Reduction System (SNCR or SCR)
VP01	Nebraska Boiler	40 CFR 52.21 40 CFR 60 Subpart Db 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(yy)	None	None
VP02	Paper Machine	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	None	None
VP03	Generic Fuel Burning Equipment (with a rated heat capacity less than 10 MMBtu/hr burning only natural gas excluding AMU1 – AMU4)	391-3-1-.02(2)(d)	None	None
VP04	Hurst Boiler	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll)	None	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
AMU1 through AMU4	Heaters #1 -#4	391-3-1-.02(2)(d)	None	None
Jet Corr, Inc.				
JC02	Corrugator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
JC03	20.9 MMBtu/hr Cleaver Brooks Boiler	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll)	None	None
JC04	Fulton Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
JC05	Generic Fuel Burning Equipment (with a rated heat capacity less than 10 MMBtu/hr burning only natural gas)	391-3-1-.02(2)(d)	None	None
JC06	37.12 MMBtu/hr Cleaver Brooks Boiler	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll)	None	None
FM01 FM12 FM15 FM17 FM18 FM19 FM20 FM22 FM24	Flexo Folder Gluer Flexo Folder Gluer Preprint Press Flexo Folder Gluer Labeler/Lamintaor Flat Bed Die Cutter Flat Bed Die Cutter Rotary Die Cutter Marten 3-Color Rotary Die Cutter	NAA-NSR Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm) 391-3-1-.02(2)(tt)	None	None
FM02 FM03 FM04 FM05 FM06 FM07	Flexo Folder Gluer Rotary Die Cutter Rotary Die Cutter Flexo Folder Gluer Flexo Folder Gluer Flexo Folder Gluer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm) 391-3-1-.02(2)(tt)	None	None
FM23	Flexo Folder Gluer	NAA-NSR Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm) 391-3-1-.02(2)(tt)	None	None
FM25 FM26 FM28 FM27 FM29	Ward 4-Color Flexo-Folder Gluer Ward 4-Color Flexo-Folder Gluer Bobst 4-Color Flexo-Folder Gluer Ward 3-Color Rotary Die Cutter Ward 3-Color Rotary Die Cutter	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm) 391-3-1-.02(2)(tt)	None	None

B. Equipment & Rule Applicability

The equipment listed in the Table above is subject to the following rules and regulations:

- 40 CFR 52.21 – “*Prevention of Significant Deterioration.*”
- 40 CFR 51.165 – “*Permit Requirements for Reviews of New Sources and Modifications.*”
40 CFR 60 Subpart A – “*General Provisions*”
- 40 CFR 60 Subpart Db – “*Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*”

- 40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units”
- 40 CFR 63 Subpart A – “General Provisions”
- 40 CFR 63 Subpart JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”
- Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions”
- Georgia Rule 391-3-1-.02(2)(d) – “Fuel-Burning Equipment”
- Georgia Rule 391-3-1-.02(2)(e) – “Particulate Emissions from Manufacturing Equipment”
- Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide”
- Georgia Rule 391-3-1-.02(2)(n) – “Fugitive Emissions”
- Georgia Rule 391-3-1-.02(2)(mm) – “VOC Emissions from Graphic Arts Systems”
- Georgia Rule 391-3-1-.02(2)(tt) – “VOC Emissions from Major Sources”
- Georgia Rule 391-3-1-.02(2)(yy) – “Emissions of NO_x from Major Sources”
- Georgia Rule 391-3-1-.02(2)(lll) – “NO_x Emissions from Fuel-Burning Equipment”

Visy Paper Sources

1. The Biomass Boiler (previously called Alternative Fuels Power Island) (ID No. PI01) was manufactured and installed in 2008. The gasifier has a heat input rate of 380 MMBtu/hour. For fuel, the facility uses natural gas (for startup and flame stabilization only), C&D wood, clean cellulosic biomass, resinated wood, and paper recycling residuals. The unit has a bag filter to control PM emissions (ID No. PIC1), a sodium bicarbonate addition system to control HCl and SO₂ emissions (ID No. PIC2), and a selective catalytic reduction (SCR) NO_x reduction system to control NO_x emissions (ID No. PIC4). Additionally, the facility uses continuous emissions monitors (CEMs) for monitoring NO_x, SO₂, CO, and opacity emissions. It is not subject to the requirements of 391-3-1-.02(2)(lll) due to the size of the boiler (greater than 250 MMBtu/hr).

It is subject to the following rules and regulations.

- 40 CFR 52.21 – “Prevention of Significant Deterioration.” This was discussed in Sections I.E and II.A of this narrative.
- 40 CFR 51.165 – “Permit Requirements for Reviews of New Sources and Modifications.” The Biomass Boiler project triggered a NAA-NSR review for NO_x emissions and a BACT limit of 0.07 lb/MMBtu on a 30-day rolling average was established. Additionally, the facility accepted a 100tpy NO_x site-wide limit in order to be subject BACT in lieu of LAER.
- 40 CFR 60 Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” The unit has a heat input capacity of greater than 100 MMBtu/hour and was constructed after June 19, 1984. SO₂ emissions are limited to 0.20 lb/MMBtu per 40 CFR 60.42b(k), and PM emissions are limited to 0.03 lb/MMBtu per 40 CFR 60.43b(h)(1). The opacity is limited to 20% opacity, except for one 6-minute period of hour of not more than 27% per 40 CFR 60.43b(f). The NO_x emissions are limited to 0.20 lb/MMBtu, unless the facility has an annual capacity factor for natural gas of 10% or less per 40 CFR 60.44b(l)(1). However, this NO_x limit is subsumed by the BACT limit of 0.07 lb/MMBtu on a 30-day rolling average.

- Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-Burning Equipment.*” Fuel-burning equipment with a heat input rating greater than 250 MMBtu/hr that is constructed after January 1, 1972 is limited for PM emissions to 0.10 lb/MMBtu heat input, which is subsumed by the PM limit of 40 CFR 60 Subpart Db at 0.03 lb/MMBtu. The opacity limit of 20% opacity, except for one 6-minute period per hour of not more than 27%, is the same as the 40 CFR 60 Subpart Db standard. Since the boiler is rated at greater than 250 MMBtu/hr, this boiler is subject to 0.2 lb/MMBtu for NO_x emissions while firing gas per 391-3-1-.02(2)(d)4.(iii). However, this NO_x limit is subsumed by the BACT limit of 0.07 lb/MMBtu on a 30-day rolling average.
- Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide.*” The sulfur content of the fuel is limited to 3%, by weight, at all times that the sulfur dioxide abatement system is not operating.
- Georgia Rule 391-3-1-.02(2)(tt) – “*VOC Emissions from Major Sources.*” Since the facility is located in Rockdale County and has potential emissions greater than 25 tpy, the facility must adhere to RACT plan for controlling VOC emissions. VOC RACT for the Biomass Boiler has been determined to be utilization of good combustion control techniques and a limit on VOC emissions of 10.8 tons per consecutive 12-month period.
- Georgia Rule 391-3-1-.02(2)(yy) – “*Emissions of NO_x from Major Sources.*” Since the facility is located in Rockdale County and has potential emissions greater than 25 tpy, the facility must adhere to RACT plan for controlling NO_x emissions. Since, by definition BACT is a more stringent control standard than RACT, the facility has stipulated that the BACT emission rate limit and control technology will satisfy the RACT requirements of Rule (yy). Because both BACT and RACT evaluations involve a “top-down” analysis of available control technologies, the Division concurs with the applicant on this approach.
- 40 CFR 64 – “*Compliance Assurance Monitoring (CAM)*”. The Biomass Boiler employs NO_x reduction technology to abate NO_x emissions, a sodium bicarbonate slurry to abate HCl and SO₂ emissions, and a baghouse to abate PM emissions. Since the emission limit is more stringent than the applicable 40 CFR 60 Subpart Db limit, CAM is applicable for NO_x only.
- 40 CFR 63 Subpart JJJJJ – “*National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.*” The facility erroneously submitted an Initial Notification for 40 CFR 63 Subpart DDDDD on September 29, 2011, then followed it up with an Initial Notification (dated August 27, 2013) for 40 CFR 63 Subpart JJJJJ. It was then determined that, based on the fuels fired, the unit was not an industrial boiler, but was classified as a Commercial and Industrial Solid Waste Incinerator (CISWI), so the Initial Notification was withdrawn on March 18, 2014. Rather than be subject to the requirements of 40 CFR 60 Subpart CCCC – “*Standards of Performance for Commercial and Industrial Solid Waste Incineration Units,*” the facility notified the Division on August 7, 2017 that they stopped using non-traditional fuels on June 30, 2017, and acknowledged the boiler would be subject to 40 CFR 63 Subpart JJJJJ instead. They resubmitted an Initial Notification on July 28, 2017.

They listed their compliance date for 40 CFR 63 Subpart JJJJJ as December 27, 2017, 180 days after the boiler ceased firing solid waste, which was ahead of the CISWI compliance date of February 7, 2018, in order to not be applicable (40 CFR 60.2145(a)(3) and 40 CFR 63.11196(d)).

The unit is classified as an existing biomass boiler and has no associated emission standards, but it is required to conduct an energy assessment (40 CFR 63.11196(a)(3)), an initial tune-up, then follow-up tune-ups biennially (Table 2.6). The energy assessment was conducted on February 5, 2018, and the initial tune-up was August 4, 2017. All subsequent tune-ups must happen within 25 months of the previous tune-up. Permit requirements for these tune-ups will be added to this permit renewal.

2. The Nebraska Boiler (ID No. VP01) was manufactured and installed in 1994. It has a heat input capacity of 279 MMBtu/hr and is capable of firing natural gas. It previously fired No. 2 fuel oil but it no longer has that capability (based on the facility's semi-annual reports, no fuel oil has been fired in this boiler since January 1, 2017). Because it fires natural gas only, it is not applicable to 40 CFR 63 Subpart JJJJJ. It is not subject to the requirements of 391-3-1-.02(2)(III) due to a heat input capacity greater than 250 MMBtu/hr and an installation date prior to rule applicability.

It is subject to the following rules and regulations.

- 40 CFR 52.21 – “*Prevention of Significant Deterioration.*” This was discussed in Sections I.E and II.A of this narrative.
- Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-Burning Equipment.*” Georgia Rule 391-3-1-.02(2)(d)2.(iii) limits the PM emissions to 0.1 lb/MMBtu. Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of emissions to 20% opacity, except for one 6-minute period per hour of not more than 27%, which is the same as the 40 CFR 60 Subpart Db limit. Violation of the rule is unlikely because the unit only burns natural gas.
- Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide.*” The sulfur content of the fuel of 3.0% by weight is subsumed by the requirement to only fire natural gas.
- Georgia Rule 391-3-1-.03(2)(c) – “*Operating (SIP) Permit*” The boiler is permitted to burn only natural gas.
- Georgia Rule 391-3-1-.02(2)(yy) - “*Emissions of NO_x from Major Sources*” - Georgia requires the facility to have RACT plan in controlling NO_x emission because the facility is located in Rockdale County, and the source-wide PTE for NO_x exceeds 25 tpy. In 1998, the Division did not require Visy Paper to submit a NO_x RACT plan for Boiler VP01. The Division concluded that because the boiler is subject to Subpart Db and is equipped with low-NO_x burners and flue gas recirculation, the boiler emits NO_x at a rate which is less than what is typically accepted for NO_x RACT.

- 40 CFR 60 Subpart Db – “*Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*” The unit fires only natural gas. The facility is subject to 0.20 lb/MMBtu heat input for NO_x emissions and requires a CEMS to monitor emissions. There are no requirements for SO₂, PM, or opacity. The facility keeps records of natural gas usage.
 - 40 CFR 63 Subpart JJJJJ – “*National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.*” Subpart JJJJJ applies to each boiler at area sources of HAP. However, under §63.11195(e), gas-fired boilers, as defined in §63.11237, are not subject to Subpart JJJJJ. Under §63.11237, a gas-fired boiler is defined as “any boiler that burns gaseous fuels,” which includes natural gas, “not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel,” not to exceed 48 hours per calendar year. Because the Boiler meets this definition, it is NOT subject to Subpart JJJJJ.
3. The Hurst Boiler (ID No. VP04) fires natural gas and fuel oil and has a rated heat input of 20.92 MMBtu/hr. Based on the facility’s semi-annual reports, no fuel oil has been fired in this boiler since January 1, 2018. The facility is accepting a restriction to natural gas only in order to remove applicability to 40 CFR 63 Subpart JJJJJ. It is not subject to the requirements of 391-3-1-.02(2)(yy) due to the exclusion under 391-3-1-.02(2)(III)5.

It is subject to the following rules and regulations.

- Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-Burning Equipment.*” Georgia Rule 391-3-1-.02(2)(d)2.(ii) limits the PM emissions to $P = 0.5 (10/R)^{0.5}$. Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of emissions to 20% opacity, except for one 6-minute period per hour of not more than 27%. Violation of the rule is unlikely because the unit only burns natural gas.
- Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide.*” The sulfur content of the fuel is limited to 2.5%, by weight. Violation of the rule is unlikely because the unit only burns natural gas.
- Georgia Rule 391-3-1-.02(2)(III) - “*NO_x Emissions from Fuel-Burning Equipment.*” 391-3-1-.02(2)(III)1. limits NO_x emissions from Boiler VP04 to 30 ppm at 3% O₂ on a dry basis during the months of May through September every year.
- 40 CFR 60 Subpart Dc – “*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*” Since the unit fires only natural gas, there are no applicable limitations, but the unit is still subject to the rule. The facility keeps records of natural gas usage.

- 40 CFR 63 Subpart JJJJJ – “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*” Subpart JJJJJ applies to each boiler at area sources of HAP. However, under §63.11195(e), gas-fired boilers, as defined in §63.11237, are not subject to Subpart JJJJJ. Under §63.11237, a gas-fired boiler is defined as “any boiler that burns gaseous fuels,” which includes natural gas, “not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel,” not to exceed 48 hours per calendar year. Because the Boiler meets this definition, it is NOT subject to Subpart JJJJJ.
4. Heaters #1 through #4 (ID Nos. AMU1 through AMU4) and Generic Fuel Burning Equipment (ID No. VP03). These units fire only natural gas. Existing Heater #5 has been taken out of service and will be removed from the permit.
- Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-Burning Equipment.*” Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of the emissions from Heaters AMU1-AMU4 to 20%. Since these heaters were constructed after January 1, 1972 and each of them has an heat capacity less than 10 MMBtu/hr, the allowable PM emission rate from each boiler is 0.5 lb/MMBtu according to Georgia Rule 391-3-1-.02(2)(d)2.(i). Compliance with Georgia Rule (d) is always expected because the heaters fire exclusively on natural gas and natural gas is considered a clean fuel.
 - Georgia Rule 391-3-1-.03(2)(c) – “*Operating (SIP) Permit*” The equipment is permitted to burn only natural gas.
5. Paper Machine (ID No. VP02) – The paper machine was installed in 1995. The paper machine receives its steam from the Nebraska Boiler, so it is not considered fuel-burning equipment.
- Georgia Rule 391-3-1-.02(2)(b) – “*Visible Emissions.*” Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of the emissions from VP02 to 40% at all times of operation.
 - Georgia Rule 391-3-1-.02(2)(e) – “*Particulate Emissions from Manufacturing Processes.*” The allowable PM emission rate from VP02 is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

$E = 55 * P^{0.11} - 40$ for process input weight rate above 30 tons per hour,
 Where: E = the allowable PM emission rate in pounds per hour
 P = process input weight rate in tons per hour.
- Since VP02 is a wet process, PM emissions from VP02 are minimal.

- Georgia Rule 391-3-1-.02(2)(tt) – “*VOC Emissions from Major Sources.*” Since the facility is located in Rockdale County and has potential emissions greater than 25 tpy, the facility must adhere to RACT plan for controlling VOC emissions. The use of 2-Butoxyethanol to remove stickies on the felt is the primary VOC source. Visy Paper submitted a VOC RACT plan in 1998. This plan first concludes that chemical substitution is not a feasible VOC control alternative because the facility cannot find other chemicals that can adequately remove stickies from the felt. Visy Paper is not able to market low-strength paperboard, and therefore must use 2-Butoxyethanol to clean the felt. The RACT plan then concludes that capture and control technologies are not feasible and will increase the operational cost because the VOC concentrations in the exhaust stream are very diluted. VOC concentrations are diluted because VOC emissions from the paper machine dissipate as fugitive emissions and contain a high percentage of water vapor. Finally, the plan concludes that the only feasible alternative is to continue searching for felt cleaners which have low VOC content. The Division agreed with Visy Paper that no capture and control technology is feasible. In addition, the Division is not able to require Visy Paper to use felt cleaners, which inevitably produce inferior paperboard. As a result, the Division approves Visy Paper’s conclusions concerning VOC RACT.

Jet Corr Sources

1. 20.9 MMBtu/hr Cleaver Brooks Boiler (ID No. JC03) was constructed in 2009 and has a heat input capacity of 20.9 MMBtu/hr. The Boiler is permitted to burn natural gas only (previously had distillate fuel oil as backup during periods of curtailment, supply interruption, startups, or periodic testing). It is subject to the following rules and regulations.
 - 40 CFR 60 Subpart Dc – “*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*” Since the unit fires only natural gas, there are no applicable limitations, but the unit is still subject to the rule. The facility keeps records of natural gas usage.
 - Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-burning Equipment.*” Georgia Rule 391-3-1-.02(2)(d)2.(ii) limits the PM emissions to $P = 0.5 (10/R)^{0.5}$. Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of emissions to 20% opacity, except for one 6-minute period per hour of not more than 27%.
 - Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide.*” The sulfur content of the fuel is limited to 2.5%, by weight. Violation of the rule is unlikely because the unit only burns natural gas.
 - Georgia Rule 391-3-1-.02(2)(yy) – “*Emissions of Nitrogen Oxides from Major Sources.*” Because the facility is located in Rockdale County and the Part 70 site-wide potential emissions exceed 25 tpy of NO_x, the facility is required to meet the requirement for Division-approved RACT in controlling NO_x emissions. For the Boiler, the RACT approved by the Division is equivalent to the operating caps established for NAA NSR avoidance and for avoidance of 40 CFR 52.21. These operating caps are the following:
 - The fuels fired in the JC03 Boiler are limited to natural gas.

- The Boiler may fire only natural gas during the months of May through September of each year (applied when the unit still fired fuel oil, but is now covered by the natural gas only restriction).
 - Georgia Rule 391-3-1-.02(2)(III) – *NO_x Emissions from Fuel-Burning Equipment*: The Boiler is subject to Rule (III) because it has a heat input capacity between 10 MMBtu/hr and 250 MMBtu/hr and is located in Rockdale County. Rule (III) limits the NO_x emissions from the Boiler to 30 ppm at 3% oxygen on a dry basis during the period of May 1 through September 30 of each year.
 - 40 CFR 63 Subpart JJJJJ – “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*” Subpart JJJJJ applies to each boiler at area sources of HAP. However, under §63.11195(e), gas-fired boilers, as defined in §63.11237, are not subject to Subpart JJJJJ. Under §63.11237, a gas-fired boiler is defined as “any boiler that burns gaseous fuels,” which includes natural gas, “not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel,” not to exceed 48 hours per calendar year. Because the Boiler meets this definition, it is NOT subject to Subpart JJJJJ.
 - Georgia Rule 391-3-1-.03(2)(c) – “*Operating (SIP) Permit*” The boiler is permitted to burn only natural gas.
2. Fulton Boiler (ID No. JC04) is a 50 hp natural gas fired only boiler. It was installed in 2018 to replace the existing 50 hp Hurst Boiler. It is subject to the following rules and regulations.
- Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-Burning Equipment*.” PM emissions are limited to 0.50 lb/MMBtu heat input. The opacity of emissions is limited to 20% opacity, except for one 6-minute period per hour of not more than 27%. Violation of this rule is unlikely because the unit burns only natural gas.
 - Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide*.” The sulfur content of the fuel is limited to 2.5%, by weight. This condition is subsumed by a condition that requires the facility to burn only natural gas.
 - Georgia Rule 391-3-1-.03(2)(c) – “*Operating (SIP) Permit*” The boiler is permitted to burn only natural gas.

3. 37.12 MMBtu/hr Cleaver Brooks Boiler (ID No. JC06) was installed in 2019. It has a heat input capacity of 37.12 MMBtu/hr (900 hp) and fires natural gas only. It is not subject to the requirements of 391-3-1-.02(2)(yy) due to the exclusion under 391-3-1-.02(2)(III)5. The facility originally was permitted for a 700 hp (29.4 MMBtu/hr) boiler, but later discovered the installed boiler was actually 900 hp (37.12 MMBtu/hr). No changes in rules or regulations occurred due to this discovery.
 - 40 CFR 60 Subpart Dc – “*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*” Since the unit fires only natural gas, there are no applicable limitations, but the unit is still subject to the rule. The facility keeps records of natural gas usage.
 - Georgia Rule 391-3-1-.02(2)(d) – “*Fuel-burning Equipment.*” Georgia Rule 391-3-1-.02(2)(d)2.(ii) limits the PM emissions to $P = 0.5 (10/R)^{0.5}$. Georgia Rule 391-3-1-.02(2)(d)3. limits the opacity of emissions to 20% opacity, except for one 6-minute period per hour of not more than 27%.
 - Georgia Rule 391-3-1-.02(2)(g) – “*Sulfur Dioxide.*” The sulfur content of the fuel is limited to 2.5%, by weight. Violation of this rule is unlikely because the unit burns only natural gas.
 - Georgia Rule 391-3-1-.02(2)(III) – *NO_x Emissions from Fuel-Burning Equipment*: The Boiler is subject to Rule (III) because it has a heat input capacity between 10 MMBtu/hr and 250 MMBtu/hr and is located in Rockdale County. Rule (III) limits the NO_x emissions from the Boiler to 30 ppm at 3% oxygen on a dry basis during the period of May 1 through September 30 of each year.
 - 40 CFR 63 Subpart JJJJJ – “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*” Subpart JJJJJ applies to each boiler at area sources of HAP. However, under §63.11195(e), gas-fired boilers, as defined in §63.11237, are not subject to Subpart JJJJJ. Under §63.11237, a gas-fired boiler is defined as “any boiler that burns gaseous fuels,” which includes natural gas, “not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel,” not to exceed 48 hours per calendar year. Because the Boiler meets this definition, it is NOT subject to Subpart JJJJJ.
4. Corrugator (ID No. JC02) is subject to:
 - Georgia Rule 391-3-1-.02(2)(b) – “*Visible Emissions.*” Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of the emissions from VP02 to 40% at all times of operation.

- Georgia Rule 391-3-1-.02(2)(e) – “*Particulate Emissions from Manufacturing Processes.*” The allowable PM emission rate from VP02 is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

$$E = 55 * P^{0.11} - 40 \text{ for process input weight rate above 30 tons per hour,}$$

Where: E = the allowable PM emission rate in pounds per hour
P = process input weight rate in tons per hour.

5. Various Rotary Die Cutters, Flexo Folder Gluers, PrePrint Presses, Printer, Labelers, Labelers/Laminators, Flat Bed Die Cutters, Marten 3-Color Rotary Die Cutters, Ward 3/4-Color Rotary Die Cutters (ID Nos. FM01 through FM29, as still installed and operational at the facility) were installed at various times. As discussed in Section I.E, various equipment is subject to NAA-NSR avoidance limits. FM14 was removed from the facility. FM18 was replaced by a Labeler/Laminator.

The equipment is subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(b) – “*Visible Emissions.*” Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of the emissions from the equipment to 40% at all times of operation.
- Georgia Rule 391-3-1-.02(2)(e) – “*Particulate Emissions from Manufacturing Processes.*” The allowable PM emission rate from the equipment is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

$$E = 55 * P^{0.11} - 40 \text{ for process input weight rate above 30 tons per hour,}$$

Where: E = the allowable PM emission rate in pounds per hour
P = process input weight rate in tons per hour.

- Georgia Rule 391-3-1-.02(2)(mm) – “*VOC Emissions from Graphic Arts Systems.*” This regulation, applicable to sources located in Rockdale County, limits the VOC content of any ink or coating as applied for packaging rotogravure and flexographic printing as follows: (1) equal to or less than 25% by volume of the volatile content of the coating or ink; or (2) equal to or less than 40% by volume of the coating or ink, minus water; or (3) equal to or less than 0.5 lb VOC/lb coating solids. Equipment FM01 through FM 29 are subject to this regulation because facility potential VOC emissions from packaging rotogravure, publication rotogravure, and flexographic printing equal or exceed 25 tpy and it is located in Rockdale County.

Sources subject to this regulation must comply with the following housekeeping requirements for any affected cleaning operation: (1) store all VOC-containing cleaning materials and used shop towels in closed containers; (2) ensure that storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials; (3) minimize spills of VOC-containing cleaning materials; (4) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and (5) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. According to the application, the facility proposes to comply with the emission limits by the continued use of water-based inks.

- Georgia Rule 391-3-1-.02(2)(tt) – “VOC Emissions from Major Sources.” The facility’s gluing operations are subject to this regulation because potential VOC emissions exceed 25 tpy. Per Georgia Rule 391-3-1-.02(2)(tt)2, RACT means the utilization and/or implementation of water-based or low-solvent coatings, VOC control equipment such as incineration, carbon adsorption, refrigeration or other like means as determined by the Director to represent reasonably available control technology for the source category in question. The facility proposes the continued use of water-based glues with VOC content of the adhesive equal to or less than 1%, by weight to comply with this regulation.

Equipment Removed From the Permit

The York Shipley Boiler (Source Code ID No. JC01) was removed from service after the Jet Corr II Boiler (ID No. JC03) was moved to the Jet Corr facility in late 2016. It has been removed from the site and will be removed from this renewal permit.

Heater #5 (ID No. AMU5) was removed from the facility and will be removed from this renewal permit.

Various equipment with ID Nos. starting with “FM” at the Jet Corr facility have been removed from this permit as they have been shut down.

The Georgia Box Coating Machines #1 through #3 (ID Nos. GB01 through GB03) have been shut down and are no longer on site and will be removed from this renewal permit.

- C. Permit Conditions - The following table summarizes the changes to the permit conditions in this renewal permit. References to the original condition include shorthand for the different permits/amendments that are being combined into this renewal permit.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/Amendment	
Equipment Emission Caps and Operating Limits			
3.2.1	3.2.1	Visy V-03-0	This condition limits the Biomass Boiler to VOC emissions of less than 10.8 tons per 12-month period. It is a RACT (391-3-1-.02(2)(tt)) and NAA-NSR avoidance requirement. No change.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/Amendment	
3.2.2	3.2.2	Visy V-03-0	This condition limits the Biomass Boiler to NO _x emissions of less than 0.07 lb/MMBtu heat input on a 30-day rolling average. It is a RACT (391-3-1-.02(2)(yy)) requirement. It subsumes the NO _x emission limitations in 40 CFR 60 Subpart Db and Georgia Rule 391-3-1-.02(2)(d)4(iii). No change.
3.2.3	3.2.4 3.2.4 3.2.4	JC V-04-0 JC V-04-3 JC V-04-4	VOC emissions from Equipment FM01, FM12, FM17, FM22, FM24, FM15, FM18, FM19, and FM20 are limited to equal to or less than 15.31 tons from during any consecutive 12-month period. This limit originally had different equipment subject to 13.4 tpy. The V-04-3 amendment combined 2 existing limits for equipment into the 15.31 tpy (13.4 plus 2.27). No change.
3.2.4	3.2.5 3.2.5	JC V-04-0 JC V-04-3	VOC emissions from Equipment FM23 are limited to equal to or less than 11.03 tons during any consecutive 12-month period. This limit originally had many different pieces of equipment limited to 2.270 tpy, but was combined during the permitting action for V-04-3 with Condition 3.2.4 and this FM23 was given its own NAA-NSR avoidance limit. No change.
3.2.5	3.2.7	JC V-04-1	This condition limits boilers to firing fuel oil only during curtailment, gas supply interruption, startups, & periodic testing (test can last no longer than 48 hours during any calendar year). This is a NAA-NSR and PSD Avoidance limit, as well as 40 CFR 63 Subpart JJJJJ avoidance limit. Boilers VP04 and JC06 were added to this condition as well for the avoidance of 40 CFR 63 Subpart JJJJJ. The condition was modified to include exemptions for maintenance and operator training as provided by the "Gas-fired boiler" definition and to remove JC03 and VP01 since these unit fire natural gas exclusively.
3.2.6	3.2.8	JC V-04-1	This NAA-NSR and PSD Avoidance limit restricts the JC03 boiler to fire only natural gas during May – Sept. No change.
3.2.7	3.2.4	Visy V-02-0	This NAA-NSR avoidance limit is an operational restriction on the VP01 boiler in order to generate internal and external emissions reductions credits (ERCs) for the construction of the Biomass Boiler. EPD erroneously removed this condition in the V-03-0 renewal permit but did not remove the associated recordkeeping and reporting requirements. It is being reinstated in this permit as it was determined that it should have remained in the permit. The phrase "Effective twelve (12) months following successful commissioning of the AFPI (ID No. PI01)" was removed as that time period has passed. Additionally, the annual limit has changed as the operational capacity of the boiler has changed.
Equipment Federal Rule Standards			
3.3.1	3.3.1 3.3.1	Visy V-03-0 JC V-04-0	This condition subjects the facility to the applicable provisions of 40 CFR 60 Subpart A. No change.
3.3.2	3.3.3	Visy V-03-0	This condition subjects boilers VP01 and PI01 to all applicable provisions of 40 CFR 60 Subpart Db. No change.
3.3.3	3.3.7 3.3.3 3.3.5 3.3.3	Visy V-03-1 JC V-04-0 JC V-04-1 JC V-04-5	This condition subjects boilers VP04, JC03, and JC06 to the applicable provisions of 40 CFR 60 Subpart Dc. Multiple conditions were combined into a single condition.
3.3.4	3.3.4	Visy V-03-0	This condition contains the 40 CFR 60 Subpart Db limits for the PI01 boiler. No change.
3.3.5	3.3.5	Visy V-03-0	This condition contains the 40 CFR 60 Subpart Db limits for the VP01 boiler. The opacity requirement was removed since the unit no longer fires fuel oil in the unit.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/Amendment	
3.3.6	3.3.2 3.3.2	Visy V-03-0 JC V-04-0	This condition subjects the facility to the applicable provisions of 40 CFR 63 Subpart JJJJJJ. Modified to include Table 8 that references 40 CFR 63 Subpart A and to specifically call out PI01 as the applicable source.
Equipment SIP Rule Standards			
3.4.1	3.4.4 3.4.5 3.4.5 3.4.5 3.4.5	Visy V-03-0 JC V-04-0 JC V-04-3 JC V-04-4 JC V-04-5	This condition subjects the facility to Georgia Rule (b) opacity. Rather than list all the applicable sources, it was decided to reference “all applicable listed equipment in Section 3.1 of the Permit” in order to reduce potential future permitting.
3.4.2	3.4.2, 3.4.3 3.4.6 3.4.1–3.4.4 3.4.7 3.4.1, 3.4.2	Visy V-03-0 Visy V 03-1 JC V-04-0 JC V-04-1 JC V-04-5	This condition subjects the AMU1-AMU4 heaters and VP03 equipment group to the limit contained in Georgia Rule (d)2.(i). Removed GB01-GB03 equipment as they are no longer on site.
3.4.3	3.4.2, 3.4.3 3.4.6 3.4.1–3.4.4 3.4.7 3.4.1, 3.4.2	Visy V-03-0 Visy V 03-1 JC V-04-0 JC V-04-1 JC V-04-5	This condition subjects the VP04, JC04, JC03, and JC06 Boilers and the JC05 equipment group to the limit contained in Georgia Rule (d)2.(ii). No changes.
3.4.4	3.4.2, 3.4.3 3.4.6 3.4.1–3.4.4 3.4.7 3.4.1, 3.4.2	Visy V-03-0 Visy V 03-1 JC V-04-0 JC V-04-1 JC V-04-5	This condition subjects the VP01 Boiler to the limit contained in Georgia Rule (d)2.(iii). No changes.
3.4.5	3.4.2, 3.4.3 3.4.6 3.4.1–3.4.4 3.4.7 3.4.1, 3.4.2	Visy V-03-0 Visy V 03-1 JC V-04-0 JC V-04-1 JC V-04-5	This condition subjects the facility to Georgia Rule (d)3 opacity. Rather than list all the applicable sources, it was decided to reference “all applicable listed equipment in Section 3.1 of the Permit” in order to reduce potential future permitting
3.4.6	3.4.5 3.4.6 3.4.6 3.4.6 3.4.6	Visy V-03-0 JC V-04-0 JC V-04-3 JC V-04-4 JC V-04-5	This condition subjects the facility to Georgia Rule (e). Rather than list all the applicable sources, it was decided to reference “all applicable listed equipment in Section 3.1 of the Permit” in order to reduce potential future permitting
3.4.7	3.4.1	Visy V-03-0	This condition subjects the PI01 boiler to the sulfur content in Georgia Rule (g)2.
3.4.8	3.4.7	Visy V-03-1	This condition subjects the VP04 boiler to the sulfur content in Georgia Rule (g)2.
3.4.9	3.2.5 3.4.8 3.4.8	Visy V-03-0 JC V-04-1 JC V-04-5	This condition limits the NO _x emissions from the JC03, JC06, and VP04 boilers to 30 ppm from May 1- Sept 30. It is a Georgia Rule (III) requirement for boilers not subject to Georgia Rule (yy) (RACT). No change.
3.4.10	3.4.9	JC V-04-5	This condition states the limits for VOC emissions from equipment subject to Georgia Rule (mm). No change.
3.4.11	3.4.10	JC V-04-5	This condition provides options for meeting the VOC emissions limits from equipment subject to Georgia Rule (mm). No change.
3.4.12	3.4.11	JC V-04-5	This condition outlines housekeeping requirements for equipment with VOC emissions subject to Georgia Rule (mm). No change.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/Amendment	
3.4.13	2.4.1	Visy V-3-0 JC V-04-0	Georgia Rule (tt) RACT plan that requires the facility to take reasonable precautions during the handling and transferring of dyes and felt cleaners containing VOC from various storage units. No change.
3.4.14	2.4.2	Visy V-3-0 JC V-04-0	Georgia Rule (tt) RACT plan that requires the facility to store dyes and felt cleaners containing VOC in sealed containers. No change.
3.4.15	2.4.3	Visy V-3-0 JC V-04-0	Georgia Rule (tt) RACT plan that requires that all VOC waste containers be equipped with tight fitting lids. No change.
3.4.16	3.2.3	JC V-04-0	Georgia Rule (tt) RACT plan that limits the VOC content of the adhesive used in certain equipment. No change.
3.4.17	3.2.4 3.2.6	Visy V-03-0 JC V-04-0	This condition limits the fuel in Heaters #1 - #5, equipment group VP03, Fulton Boiler, VP01 boiler, JC03 boiler, and Equipment Group JC05 to natural gas only. Heater #5 is no longer in operation, so it was removed from this condition and the equipment list. Hurst boiler was changed to new name Fulton Boiler. Added VP01 and JC03 boiler since fuel oil firing capabilities were removed. Removed equipment GB01-GB03.
Equipment Standards Not Covered by a Federal or SIP Rule			
3.5.1	3.5.1	Visy V-03-0	The condition requires the facility to maintain an inventory of filter bags. No change.
3.5.2	3.5.1	JC V-04-5	This condition is a general condition to minimize spills and is considered part of standard language for sources subject to Georgia Rule (mm). No change.
Conditions No Longer in the Permit			
	3.2.1	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.2.2	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.2.3	Visy V-03-0	This condition limits the VP01 boiler to an annual capacity factor of 10% or less for No. 2 fuel oil consumption. The unit is no longer capable of firing fuel oil.
	3.3.3	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.3.4	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.4.1	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.2.4	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	3.3.6	Visy V-03-0	Fuel oil is no longer fired in the VP01 boiler.
	3.3.6	JC V-04-1	Fuel oil is no longer fired in the JC03 boiler.

Visy = Visy Paper, V-03-0 = 2631-247-0037-V-03-0 permit; V-03-1, V-03-2 = subsequent permit amendments

JC = Jet Corr, V-04-0 = 2631-247-0047-V-04-0 permit; V-04-0, V-04-1, V-04-3, V-04-4, & V-04-4 = subsequent permit amendments.

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

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
4.2.1	4.2.1	Visy V-3-0	This condition outlines the required testing schedule for sources at the facility. Only PM from the PI01 is required to be tested annually. No change.
Conditions No Longer in the Permit			
	4.2.1	JC V-04-1	This condition requires fuel certs to ensure compliance with SO ₂ limits. This unit no longer fires fuel oil.

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

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
5.2.1	5.2.1	Visy V-03-0	Outlines the CEMS and COMS required for the PI01 and VP01 boilers. 5.2.1.e requirement for COMS for No. 2 fuel oil firing in the VP01 was removed since the unit is no longer capable of firing fuel oil.
5.2.2	5.2.2	Visy V-03-0	Outlines continuous monitoring for the Biomass Boiler. No change.
5.2.3	5.2.4	JC V-04-1	Outlines monitoring devices for the JC03 Boiler. Removed requirement for recording fuel oil consumption since the unit is no longer capable of firing fuel oil.
5.2.4	5.2.3	Visy V-03-0	40 CFR 60 Subpart Db requirements for calculating SO ₂ emissions for the PI01 boiler. No change.
5.2.5	5.2.4	Visy V-03-0	40 CFR 60 Subpart Db requirements for calculating NO _x emissions for the PI01 boiler. No change.
5.2.6	5.2.5 5.2.14	Visy V-03-0 Visy V-03-0	40 CFR 60 Subpart Db definition of an operating day. No change.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
5.2.7	5.2.6 5.2.15	Visy V-03-0 Visy V-03-0	40 CFR 60 Subpart Db calculation requirements. No change.
5.2.8	5.2.7 5.2.16	Visy V-03-0 Visy V-03-0	CEMs calibration requirements for the PI01 and VP01 boiler. No change.
5.2.9	5.2.8	Visy V-03-0	Preventative Maintenance Program for PI01 baghouse. No change.
5.2.10	5.2.9	Visy V-03-0	CAM requirement for PI01. No change.
5.2.11	5.2.10	Visy V-03-0	CAM plan for PI01. No change.
5.2.12	5.2.11	Visy V-03-0	Natural gas meter requirement for VP01. Removed language regarding fuel oil meter as fuel oil is no longer fired in this unit.
5.2.13	5.2.13	Visy V-03-0	40 CFR 60 Subpart Db requirements for calculating NO _x emissions for the VP01 boiler. No change.
5.2.14	5.2.17	Visy V-03-0	Georgia Rule (tt) inspection. No. Change.
5.2.15	5.2.18 5.2.5 5.2.5	Visy V-03-0 JC V-04-1 JC V-04-5	Georgia Rule (Ill) tune ups for the VP04, JC03, and JC06 boiler. No change.
5.2.16	5.2.3	JC V-04-0	Georgia Rule (tt) work practice plan. No. Change.
5.2.17	5.2.6	JC V-04-5	Baghouse bag inspection requirement. No change.
5.2.18	NEW	----	This new condition outlines the biennial tune-ups that must be conducted on PI01 for 40 CFR 63 Subpart JJJJJ.
Conditions No Longer in the Permit			
	5.2.1	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	5.2.2	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	5.2.12	Visy V-03-0	Alternate to COMs requirement for VP01 boiler. Removed since the unit is no longer subject to an opacity requirement due to fuel oil no longer being fired.

Visy = Visy Paper, V-03-0 = 2631-247-0037-V-03-0 permit; V-03-1, V-03-2 = subsequent permit amendments

JC = Jet Corr, V-04-0 = 2631-247-0047-V-04-0 permit; V-04-0, V-04-1, V-04-3, V-04-4, & V-04-4 = subsequent permit amendments.

C. Compliance Assurance Monitoring (CAM)

NO_x emissions from the PI01 boiler are subject to the requirements of 40 CFR 64 since the accepted NO_x emission limitation is more stringent than the applicable 40 CFR 60 Subpart Db limit.

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 quarterly basis.

B. Specific Record Keeping and Reporting Requirements

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
6.1.7	6.1.7	Visy V-03-0 Visy V-03-1 Visy V-03-2 JC V-04-0 JC V-04-1 JC V-04-3 JC V-04-4 JC V-04-5	Excess emissions, exceedances, excursions, and other. Various minor changes to clarify, correct, or combine.
6.1.8	6.1.8	Visy V-03-0	This condition requires reports of annual VOC and NO _x from the facility for facilities in non-attainment areas. No change.
6.2.1	6.2.2 6.2.2	Visy V-03-0 JC V-04-0	This condition outlines fuel oil certs for the site. No changes.
6.2.2	6.2.3	Visy V-03-0	This condition outlines HAP calculations from the site. No changes
6.2.3	6.2.4	Visy V-03-0	This condition outlines NO _x emission calculations from the site. Removed fuel oil items for VP01 and equipment GB01-GB03.
6.2.4	6.2.5	Visy V-03-0	This condition outlines CO emission calculations from the site. Removed fuel oil items for VP01 and equipment GB01-GB03.
6.2.5	6.2.6	Visy V-03-0	This condition outlines SO ₂ emission calculations from the site. No changes. Removed equipment GB01-GB03.
6.2.6	6.2.7	Visy V-03-0	This condition outlines NO _x emission calculations from VP01 and heaters AUM1-AMU4. No changes.
6.2.7	6.2.8	Visy V-03-0 Visy V-03-2	This condition outlines the monthly and annual emission calculations for NO _x , SO ₂ , and CO from the site and the necessary reporting. Modified to reference the equipment outlined in Conditions 7.14.1 and 7.14.2.
6.2.8	6.2.9	Visy V-03-0	This condition calculates the annual capacity factor for PI01. No change.
6.2.9	6.2.10	Visy V-03-0	This condition outlines 40 CFR 60 Subpart Db records for PI01. No change.
6.2.10	6.2.11	Visy V-03-0	This condition outlines VOC emission calculations from the PI01. No change.
6.2.11	6.2.12	Visy V-03-0	This condition requires fuel analysis of new fuels in the PI01. No change.
6.2.12	6.2.13	Visy V-03-0	This condition requires a bag leak detection system on the PI01 baghouse. No change.
6.2.13	6.2.15	Visy V-03-0	This condition outlines 40 CFR 60 Subpart Db records for VP01. No change.
6.2.14	6.2.16	Visy V-03-0	This condition outlines the NO _x emission calculations for VP01. Modified to change the monthly reportable emissions to 1.42 tons, based on the new 12-month rolling total of 17.04 tons.
6.2.15	6.2.17	Visy V-03-0	This condition requires records of natural gas consumption for AMU1-4 and VP03. Removed equipment GB01-GB03 since equipment is no longer on site.
6.2.16	6.2.19 6.2.15	Visy V-03-1 JC V-04-1	This condition requires records of natural gas consumption for VP04. Combined with JC03 since it fires only natural gas under 40 CFR 60 Subpart Dc.
6.2.17	6.2.1	JC V-04-0	This condition outlines the fuel certs for fuel oil under 40 CFR 60 Subpart Dc. No change.
6.2.18	6.2.4	JC V-04-0	Records of natural gas usage in JC04 and JC05. No change.
6.2.19	6.2.5	JC V-04-0	Records of VOC-containing compounds from specific equipment. No change.

Renewal Condition	Original Condition		Changes for Renewal Permit
	Number	Permit/ Amendment	
6.2.20	6.2.6	JC V-04-0 JC V-04-3 JC V-04-4	Records of VOC-containing compounds from specific equipment. No change.
6.2.21	6.2.7	JC V-04-0	Records of VOC-containing compounds from specific equipment. No change.
6.2.22	6.2.8	JC V-04-0 JC V-04-3 JC V-04-4	Calculate VOC emissions from specific equipment. No change.
6.2.23	6.2.9	JC V-04-0 JC V-04-3	Calculate VOC emissions from specific equipment. No change.
6.2.24	6.2.10	JC V-04-0	Calculate VOC emissions from specified equipment. No change.
6.2.25	6.2.11	JC V-04-0	Submission of VOC emissions. No change.
6.2.26	6.2.12 6.2.20	JC V-04-0 JC V-04-1	Calculating emissions from the Jet Corr facility. All references to the York Shipley boiler were removed. Combined with another condition with similar wording.
6.2.27	6.2.13 6.2.21	JC V-04-0 JC V-04-1	Emissions to be submitted with quarterly reports. Combined with another condition with similar wording.
6.2.35	6.2.18	JC V-04-1	Tune up records for VP04, JC03, and JC06. No change.
6.2.36	6.2.19	JC V-04-1 JC V-04-5	Certification that no changes were made to JC03 or JC06 since last tune up. No change.
6.2.37	6.2.22	JC V-04-5	Notification of construction and startup for JC06. No change.
6.2.38	6.2.23	JC V-04-5	Records of natural gas usage in JC06. No change.
6.2.39	6.2.24	JC V-04-5	VOC emission calculations. No change.
6.2.40	NEW	NEW	New 6J conditions for the Biomass Boiler
6.2.41	NEW	NEW	New 6J conditions for the Biomass Boiler
6.2.42	NEW	NEW	New 6J conditions for the Biomass Boiler
Conditions No Longer in the Permit			
	6.1.7.b.i 6.1.7.b.ii 6.1.7.b.iii	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	6.1.7.a.iv 6.1.7.a.v 6.1.7.b.ix 6.1.7.b.x 6.1.7.c.iv 6.2.1	Visy V-03-0	VP01 no longer fires fuel oil, so the opacity reporting requirements are no longer needed
	6.1.7.b.viii	JC V-04-1	JC03 no longer fires fuel oil.
	6.2.1	Visy V-03-0	VP01 no longer fires fuel oil so fuel certs are no longer needed.
	6.2.14	Visy V-03-0	VP01 no longer fires fuel so no annual capacity factor is not applicable.
	6.2.3	JC V-04-0	The York Shipley Boiler JC01 was removed from the site.
	6.2.18	Visy V-03-1	This condition required notification of construction and startup of VP04. This was completed
	6.2.16	JC V-04-1	The condition required notification of construction and startup of JC03. This was completed.

	6.2.13 6.2.14 6.2.17	JC V-04-1	JC03 no longer fires fuel oil.
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Visy = Visy Paper, V-03-0 = 2631-247-0037-V-03-0 permit; V-03-1, V-03-2 = subsequent permit amendments

JC = Jet Corr, V-04-0 = 2631-247-0047-V-04-0 permit; V-04-0, V-04-1, V-04-3, V-04-4, & V-04-4 = subsequent permit amendments.

VII. Specific Requirements

- A. Operational Flexibility – Not Applicable
- B. Alternative Requirements - Not Applicable
- C. Insignificant Activities - See Permit Application on GEOS website and Attachment B of the permit.
- D. Temporary Sources - Not Applicable
- E. Short-Term Activities - Not Applicable
- F. Compliance Schedule/Progress Reports - Not Applicable
- G. Emissions Trading - Not Applicable
- H. Acid Rain Requirements - Not Applicable
- I. Stratospheric Ozone Protection Requirements - Not Applicable
- J. Pollution Prevention - Not Applicable
- K. Specific Conditions

New Permit Condition 7.14.1 lists the equipment to which the site-wide emissions limitations apply. This is to keep the number of future modifications down to exclude new equipment.

New Permit Condition 7.14.2 lists the equipment to which the Visy Paper emissions limitation applies. This is to keep the number of future modifications down to exclude new equipment.

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.//