

Prevention of Significant Air Quality Deterioration Review

Final Determination

February 2010

Facility Name: Georgia-Pacific Consumer Products LP (Savannah River Mill)

City: Rincon

County: Effingham

AIRS Number: 04-13-10300007

Application Number: 18577

Date Application Received: November 18, 2008



State of Georgia
Department of Natural Resources
Environmental Protection Division
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BACKGROUND

On November 18, 2008, Georgia-Pacific Consumer Products LP (Savannah River Mill) (hereafter SRM) submitted an application for an air quality permit to modify or replace portions of the existing pulp bleaching systems, which will allow a small increase in total bleached pulp throughput. The project also involves a change in bleaching agents that will eliminate the use of hypochlorite. The facility is located at 393 Fort Howard Road in Rincon, Effingham County.

On January 8, 2010, the Division issued a Preliminary Determination stating that the modifications described in Application No. 18577 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that SRM place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in the *Effingham Herald* (legal organ for Effingham County) on January 12, 2010. The public comment period expired on February 11, 2010.

During the comment period, comments were received from the facility. There were no comments received from the U.S. EPA Region IV or the general public.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

GEORGIA-PACIFIC COMMENTS

Comments were received from Wayne J. Galler, Director – Air Permitting, by fax on February 11, 2010.

Comment 1

Condition 6.2.10: Under the formula for calculating total VOC emission from the paper machines and pulp mill operations, please delete reference to item D-pounds of VOC emitted from the paper machines during the month based on NCASI or other approved emission factors.

$$M_{\text{paper}} = (A)(B)(C) + (D) \text{ and } M_{\text{pulp}} = (E)(F)(G) + (H)$$

The Mill calculates total VOC emissions from the paper machines solely through the use of item numbers A, B, and C in the equation shown above, and does not use additional NCASI or any other emission factors to determine the VOCs emitted from the paper machine. Items A, B, and C provide a conservative estimate of the VOCs emitted by the paper machine by taking the VOC content of every chemical additive used for paper machine production and assuming that 100% of the VOC content of these chemical additives are emitted to the atmosphere.

EPD Response.

The EPD agrees with the comment. Including additional NCASI emission factors for the paper machines would result in the double counting of the VOC emissions. The condition has been modified to read as follows:

The Permittee shall use the monthly usage records from Conditions 6.2.9 and 6.2.20 to calculate total monthly VOC emissions for each equipment category specified in Conditions 3.3.16 and 3.3.20 in accordance with the following formula. The monthly VOC emissions totals shall be used to calculate emissions on a 12-month rolling basis. The emission records shall be kept available for inspection or submittal for five years from the date of record. The Permittee shall submit the monthly emission totals and 12-month rolling totals calculated during each reporting period with the quarterly report required by Condition 6.1.4.

[391-3-1-.03(2)(c), 40 CFR 70.6(a)(3)(i)(A), and 40 CFR 52.21]

$$M_{\text{paper}} = (A)(B)(C) \text{ and } M_{\text{pulp}} = (D)(E)(F) + (G)$$

Where:

- M_{paper} = total pounds of VOC emitted from the paper machines during the month;
- M_{pulp} = total pounds of VOC emitted from the pulp processing area and the bleaching systems during the month;
- A = gallons chemical additive and/or cleaning solvent used on paper machines during month;
- B = paper machine chemical additive and/or cleaning solvent density in lb/gal;
- C = weight fraction VOC in paper machine chemical additive and/or cleaning solvent;
- D = gallons of chemical additives and/or solvent used in pulp processing area or in bleaching systems during calendar month;
- E = density of chemical additives and/or solvent used in pulp processing area or in bleaching systems in lb/gal;
- F = weight fraction VOC in chemical additives and/or solvent used in pulp processing area or in bleaching systems.
- G = pounds of VOC emitted from the pulp processing area and the bleaching systems during the month based on NCASI or other approved emission factors.

APPENDIX A

AIR QUALITY PERMIT

2621-103-0007-V-03-4

APPENDIX B

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD