Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

5/17/2010

| | |
|---|---|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| No | SYNTHETIC MINOR TO AVOID TITLE V |
| No | FEDERALLY ENFORCABLE PTIO (FEPTIO) |

TARA IRONS
Georgia Pacific Chemicals LLC
1975 Watkins Road
Columbus, OH 43207

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125040904
Permit Number: P0105765
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
Georgia Pacific Chemicals LLC

| | |
|---|---|
| Facility ID: | 0125040904 |
| Permit Number: | P0105765 |
| Permit Type: | Renewal |
| Issued: | 5/17/2010 |
| Effective: | 5/17/2010 |
| Expiration: | 5/17/2020 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
Georgia Pacific Chemicals LLC

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# Authorization

Facility ID: 0125040904
Application Number(s): A0038731
Permit Number: P0105765
Permit Description: Renewal permit for a 20.9 MMBTU/hr gas-fired boiler #5 w/low NOx burner
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 5/17/2010
Effective Date: 5/17/2010
Expiration Date: 5/17/2020
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Georgia Pacific Chemicals LLC
1975 Watkins Road
Columbus, OH 43207

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

# Authorization (continued)

Permit Number: P0105765
Permit Description: Renewal permit for a 20.9 MMBTU/hr gas-fired boiler #5 w/low NOx burner

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

| | |
|---|---|
| **Emissions Unit ID:** | **B002** |
| Company Equipment ID: | Boiler No.5 (Z044) |
| Superseded Permit Number: | P0082765 |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

# B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

# C. Emissions Unit Terms and Conditions

**1. B002, Boiler No.5 (Z044)**

**Operations, Property and/or Equipment Description:**

20.9 MMBTU/hr gas-fired boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 01-05997) | Particulate emissions (PE) shall not exceed 0.16 lb/hr and 0.68 ton/yr.<br><br>Nitrogen oxides (NOx) emissions shall not exceed 2.81 lb/hr and 12.3 ton/yr.<br><br>Carbon monoxide (CO) emissions shall not exceed 1.72 lb/hr and 7.5 ton/yr.<br><br>Volatile organic compound (VOC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.<br><br>Sulfur dioxide ($SO_2$) emissions shall not exceed 0.01 lb/hr and 0.05 ton/yr.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | See (2)a and (2)b below. |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from the boiler stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule. |
| c. | OAC rule 3745-17-10(B)(1) | The emissions limitation established by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | 40 CFR Part 60 Subpart DC | See (2)c and c)(1) below. |
| e. | OAC rule 3745-18-06(G) | Exempt, pursuant to OAC rule 3745-18-06(A) because only natural gas is combusted. |
| f. | OAC rule 3745-110-03(A) | Exempt, pursuant to OAC rule 3745-110-03(J)(16). |

(2) Additional Terms and Conditions

a. This permit supercedes PTI 01-05997 issued November 1, 1995, and represents a net allowable increase based on revised emission factor derivation of 0.7 ton CO/yr and 0.47 ton OC/yr with no increase in allowable NOx emissions.

b. The short term and annual emission limitations reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations.

c. The applicability provisions in 40 CFR Sections 60.40- 60.46 do not apply as the boiler has an actual maximum heat input less than 100 mmBtu/hr.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain a record of the amount of natural gas in standard cubic feet (scf) combusted during each month.

(2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and condition of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
PE shall not exceed 0.16 lb/hr and 0.68 ton/yr.

Applicable Compliance Method:
The hourly emission limitation was developed by multiplying an AP-42 emission factor of 7.6 lbs PE/$10^6$ scf (Section 1.4, Table 1.4-2 (7/98)) by the maximum rated heat input capacity of 20.9 mmBtu/hr and converting lbs PE/$10^6$ scf into lbs PE/mmBtu by dividing by 1,020 mmBtu/$10^6$ scf.

The annual emission limitation was established by multiplying the hourly limit by 8,760 hrs/yr and 1 ton/2,000 lbs. Compliance with the annual limitation shall be assumed so long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and Method 202.

b. Emission Limitation:
NOx emissions shall not exceed 2.813 lb/hr and 12.3 ton/yr.

Applicable Compliance Method:
The hourly emission limitation was provided by the manufacturer (Clayton, 8/95).

The annual emission limitation was established by multiplying the hourly limit by 8,760 hrs/yr and 1 ton/2,000 lbs. Compliance with the annual limitation shall be assumed so long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4 and Method 7.

c. Emission Limitation:
CO emissions shall not exceed 1.72lb/hr and 7.5 ton/yr

Applicable Compliance Method:
The emission limitation was developed by multiplying an AP-42 emission factor of 84 lb CO/$10^6$ scf (Section 1.4, Table 1.4-1 (7/98)) by the maximum rated heat input capacity of 20.9 mmBtu/hr and converting lbs CO/$10^6$ scf into lbs CO/mmBtu by dividing by 1,020 mmBtu/$10^6$ scf.

The annual emission limitation was established by multiplying the hourly limit by 8,760 hrs/yr and 1 ton/2,000 lbs. Compliance with the annual limitation shall be assumed so long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4 and Method 10.

d. Emission Limitation:
Volatile organic compound (VOC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.

Applicable Compliance Method:
The emission limitation was developed by multiplying an AP-42 emission factor of 5.5 lb VOC/$10^6$ scf (Section 1.4, Table 1.4-2 (7/98)) by the maximum rated heat input capacity of 20.9 mmBtu/hr and converting lbs VOC/$10^6$ scf into lbs VOC/mmBtu by dividing by 1,020 mmBtu/$10^6$ scf.

The annual emission limitation was established by multiplying the hourly limit by 8,760 hrs/yr and 1 ton/2,000 lbs. Compliance with the annual limitation shall be assumed so long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4 and Method 25.

e. Emission Limitation:
Sulfur dioxide ($SO_2$) emissions shall not exceed 0.01 lb/hr and 0.05 ton/yr

Applicable Compliance Method:
The emission limitation was developed by multiplying an AP-42 emission factor of 0.6 lb $SO_2$/$10^6$ scf (Section 1.4, Table 1.4-2 (7/98)) by the maximum rated heat input capacity of 20.9 mmBtu/hr and converting lbs $SO_2$/$10^6$ scf into lbs $SO_2$/mmBtu by dividing by 1,020 mmBtu/$10^6$ scf.

The annual emission limitation was established by multiplying the hourly limit by 8,760 hrs/yr and 1 ton/2,000 lbs. Compliance with the annual limitation shall be assumed so long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission Limitation:
Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.