STATEMENT OF BASIS

Georgia-Pacific Consumer Operations LLC

Facility ID No.: 1070005
Putnam County

Title V Air Operation Permit Revision
DRAFT Title V Air Operation Permit Revision No.: 1070005-039-AV

On September 13, 2006, the Department received a Title V Permit Revision Application from the applicant to incorporate the terms and conditions of 40 CFR 63, Subpart DDDDD- Boiler MACT, Health Based Compliance Alternate.

E.U. ID No.	**Brief Description**
015	#5 Power Boiler with an electrostatic precipitator to control particulate matter emissions.

This facility is subject to the requirements of 40 CFR 63 Subpart DDDDD – Industrial, Commerical, and Institutional Boilers and Process Heaters effective November 12, 2004. Since each boiler subject to this subpart was constructed prior to April 2, 2002, the source is considered existing. In accordance with 40 CFR 63.7545(b), the initial notification submittal was received on March 11, 2005 and the revision notification was received on April 4, 2005. The compliance date for existing sources is September 13, 2007. **EU015 only has the initial notification requirements.**

The applicant has demonstrated that the unit is eligible to comply with the Total Selected Metals (TSM) emission standards in 40 CFR 63, Subpart DDDDD, based on the sum of emissions for seven selected metals (by excluding manganese emissions from the summation of TSM emission.).

The applicant has demonstrated the eligibility for Health Based Compliance Alternative by performing a site-specific compliance demonstration and shows that the maximum Hazard Quotient (HQ) for manganese from **EU 016** is less than or equal to 1.0.

E.U. ID No.	**Brief Description**
016	#4 Combination Boiler with a centrifugal collector and an electrostatic precipitator in series to control particulate matter emissions**.** This boiler serves as a backup destruction device for noncondensable gases (NCGs) and condensate stripper off-gases (EU 046) from the sources required to be controlled by 40 CFR Part 63, Subpart S (MACT I) and State TRS regulations. The primary destruction device is the Thermal Oxidizer (EU 037). When utilized in this mode, a spray tower pre-scrubber is used to remove sulfur from the batch (Batch Digesting system) streams and a separate, spray tower pre-scrubber is used to remove sulfur from the continuous (MEE System) streams prior to destruction in the boiler. NCGs from the Turpentine Condensing system and stripper off-gases (SOGs) from the Condensate Stripper System are vented directly to the boiler for destruction. The boiler is permitted to operate as the backup destruction device for a maximum uptime of 20 percent "which is equivalent to an annual maximum total of 548.7 tons of Sulfur Dioxide from the burning of NCGs and SOGs in the #4 Combination Boiler."

40 CFR 63 Subpart DDDDD Applicability

This facility is subject to the requirements of 40 CFR 63 Subpart DDDDD – Industrial, Commerical, and Institutional Boilers and Process Heaters effective November 12, 2004. Since each boiler subject to this subpart was constructed prior to April 2, 2002, the source is considered existing. In accordance with 40 CFR 63.7545(b), the initial notification submittal was received on March 11, 2005 and the revision notification was received on April 4, 2005. The compliance date for existing sources is September 13, 2007.

Pollutant	Emissions Limit	Rule
Total Selected Metals **Note (1)**	0.001 lb TSM per MMBtu of heat input	40 CFR 63.7500 (a)(1)
Hydrogen Chloride **Note (1)**	0.09 lb per MMBtu of heat input	40 CFR 63.7500 (a)(1)
Mercury **Note (1)**	0.000009 lb per MMBtu of heat input.	40 CFR 63.7500 (a)(1)

Note (1): 40 CFR 63, Subpart DDDDD compliance effective date is September 13, 2007.

Manganese Emissions Limit: The manganese emissions from the unit shall not exceed 8.31 lbs/hr, 36.4 tons/year. The limit is based on annual average. The unit is assumed to be in compliance with the manganese emissions limit when;

a. The PM emissions from the annual stack testing is in compliance with **Specific Condition No. C.4**, and
b. The unit's operating rate is 512.7 MMBtu/hour or less when firing carbonaceous fuel only or in combination with fuel oil on annual average basis; and 418.6 MMBtu/hour when firing fuel oil only on an annual average basis **(Specific Condition No. C.1.)**

If the unit cannot meet the criteria as described above, the owner or operator shall conduct performance test or fuel analysis for the TSM including all 8 metals for compliance demonstration (see **Specific Condition C.28.**). The owner or operator shall update the eligibility demonstration and resubmit it to the Department for review and approval.
[Application dated September 13, 2006]

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

CAM does apply.

Based on the Title V Air Operation Permit Revision application received on September 13, 2006, this facility is a major source of hazardous air pollutants (HAPs).