

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX/XX/2011

Region: Wilmington Regional Office
County: Columbus
NC Facility ID: 2400040
Inspector's Name: Russell Morgan III
Date of Last Inspection: 08/03/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Georgia - Pacific Whiteville Plant Facility Address: Georgia - Pacific Whiteville Plant 1980 Georgia Pacific Road Whiteville, NC 28472 SIC: 2436 / Softwood Veneer And Plywood NAICS: 321212 / Softwood Veneer and Plywood Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: 2D .1109 – Case-by-Case MACT
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 2400040.10B Date Received: 11/05/2010 Application Type: Modification Application Schedule: TV-Reopen for Cause Existing Permit Data Existing Permit Number: 00007/T18 Existing Permit Issue Date: 12/10/2010 Existing Permit Expiration Date: 12/31/2011
Doug Edmund Environmental Coordinator (910) 642-5041 (1980 G - P Road) Whiteville, NC 28472	Satrick Anthony Group Manager - Wood Products (404) 652-5397 133 Peachtree Street, NE Atlanta, GA 30303+1847	Steve Wilson Senior Environmental Engineer (803) 782-5890 15 Monckton Blvd, Ste B Columbia, SC 29206	
Review Engineer: Jeff Twisdale Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 00007/T19 Permit Issue Date: XX/XX/2011 Permit Expiration Date: 12/31/2011	

I. Purpose of Applications

Georgia-Pacific (GP) Wood Products, LLC is located in Whiteville, Columbus County, North Carolina. The Division of Air Quality (DAQ) has decided to reopen the existing permit thru Application No. 2400040.10B to revise a limit for carbon monoxide (CO) that was incorrectly set during the Maximum Achievable Control Technology (MACT) "Hammer" application (2400040.09B) for one existing wood residual/bark/edge seal/paint solids-fired boiler (**ID No. ES-B1, 241.5 million Btu per hour (MMBtu/hr) heat input capacity.**

II. Permit Modifications/Changes

The following table describes the modifications to the current permit:

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
Global	Global	N/A	<ul style="list-style-type: none"> Change the application number and complete date; Change permit revision number to T19; and Change the issuance/effective dates of the permit
7	7	2A.1B. Emission Limit Table	Correct CO limit for 2D .1109 to 555 ppmv @ 7% oxygen
11	11	Section 2A.1 B.4. Emission Limit Table	Correct CO limit for 2D .1109 to 555 ppmv @ 7% oxygen
31 - 39	31 - 39	Section 3	Update General Conditions to version 3.3

Note: Condition/Item numbers are as they appear in Permit No. 00007T19.

III. Regulatory Review – 15A NCAC 2D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters

- A. Rule Summary: On July 30, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General's office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a valid standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT "Hammer" provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On March 27, 2009, the NC DAQ received a Part 2 MACT "Hammer" application from this facility asking that the NC DAQ establish 112(j) emissions limitations. Then on January 7, 2010, the NC DAQ received an addendum to the Part 2 MACT "Hammer" application that included a Health-Based Compliance Alternative (HBCA) eligibility demonstration for the total selected metals (TSM) emission limit as well as other proposed emission limitations based on NC DAQ's 112(j) guidance.

- B. Wood-Fired Boiler: One wood residual/bark/edge seal/paint solids-fired boiler (241.5 MMBtu/hr heat input capacity, **ID No. ES-B1**) with associated multicyclone (**ID No. CD-MC1**) and venturi scrubber (**ID No. CD-VS1**) installed in series.

The facility proposed Total Selected Metals (TSM), Hydrogen Chloride (HCl), Mercury (Hg), and Carbon Monoxide (CO) emission limitations that are consistent with the NC DAQ application guidance (<http://daq.state.nc.us/permits/112j/>). NC DAQ has developed this guidance to provide standards and compliance procedures that it has determined meet the requirements of § 112(j).

Also, the facility has chosen to comply with a HBCA for TSM that included a site-specific compliance demonstration for Manganese (Mn). The HBCA eligibility demonstration is consistent with the procedures provided by the EPA in the vacated § 112(d) standard for boilers and process heaters.

Note that the emission standards and compliance methods for TSM, HCl and Hg will remain the same.

1. Carbon Monoxide (CO)

This facility initially proposed a CO limit of 508 ppmvd, corrected to 7% oxygen, which was consistent at the time with the NC DAQ application guidance for this size/type of boiler. However, NC DAQ discovered that the CO limits in the permit guidance that was developed last year were based on stack tests that were conducted for COMBINED wood and coal firing. NC DAQ has not been able to find any North Carolina data that isolates the CO emissions from green wood firing. Therefore, NC DAQ has decided to use the AP-42 emission factor for bark/wet wood-fired boilers [*0.6 lbs CO/MMBtu (See Chapter 1.6; Table 1.6-2; Sept. 2003)*]. **Therefore, the presumptive § 112(j) CO limit for green wood fired boilers is 555 ppmv, corrected to 7% oxygen.**

To demonstrate compliance with the standard, the Permittee shall install, operate and maintain a Continuous Emission Monitoring System (CEMS) for CO and oxygen according the applicable procedures under Performance Specification (PS) 3 or 4A or 40 CFR 60, Appendix B, and according to other procedures that are detailed in the permit. The Permittee shall calculate and record a 30-day rolling average emission rate (CO) on a daily basis as the average of all of the hourly CO emission data for the preceding 30 operating days. No initial performance stack test for CO is required since the facility is utilizing CEMS. Compliance is expected.

IV. Conclusions, Comments, and Recommendations

The cover letter and all other relevant pages of the permit have been modified as detailed in the table of changes above. A copy of the draft permit and review were sent to GP and WiRO on December 14, 2010. Recommend issuance of Permit No. 00007T19 after completion of public notice and EPA review periods.