

Statement of Basis
Georgia-Pacific Brewton Mill
Facility No. 502-0001
Major Modification

INTRODUCTION:

Georgia-Pacific Brewton LLC, located in Brewton, Alabama, owns and operates an integrated bleached Kraft pulp and containerboard mill, (Facility No. 502-0001) in accordance with its Major Source Operating Permit. On September 27, 2016, the Department received an application to remove the requirement to perform an annual particulate matter (PM) emissions test on the No. 2 Power Boiler (Emission Unit Z012). The No. 2 Power Boiler is rated at 323 million British thermal units per hour (MMBtu/hr) and is currently capable of burning natural gas only. On September 15, 2015, the Department issued a 502(B)10 letter to the Brewton Mill authorizing the request to remove all fuel firing capabilities except Natural Gas, as well as removal of the continuous opacity monitors (COMs) and shut down the electrostatic precipitator.

PROPOSED CHANGES:

The annual PM emissions test, as specified in Proviso 4.1 of the No. 2 Power Boiler chapter in the Mill's Title V Permit, is based on the boiler's capability to fire fuels other than natural gas and the PM emission limits associated with the other fuels. Similarly, Proviso 4.6 requires that a Sulfur Dioxide (SO₂) emissions test be performed at least once every 5 years. The SO₂ test is also based on the boiler's capability to fire fuels other than natural gas. Since the No. 2 Power Boiler is now a natural gas only unit, the requirements for an annual PM test and a 5-year SO₂ test are not necessary. The requirement of the steaming rate to remain less than 110 percent of the value set by the PM test (Proviso 4.2) along with the recordkeeping of this value (Proviso 5.2) would also be removed with this change.

The changes approved in the September 2015 502(B)10 letter would also be made at this time. These include the removal of all provisos requiring the use of a COMs (Provisos 4.3 and 5.3), the PM limits based on firing fuels other than natural gas (Provisos 2.1 and 2.2), as well as the provisos expressing the applicability of requirements for wood waste boilers which also includes emission standards for Mercury (Provisos 1.2, 1.5, 2.5 and 3.4).

The applicability of the Boiler MACT, 40 CFR Part 63 Subpart DDDDD would be incorporated into the Title V at this time. The No. 2 Power Boiler would be considered an existing source as defined by 40 CFR 63.7490(a)(1), and would be classified as a Gas 1 Boiler, which includes any boiler that burns only natural gas, refinery gas, and/or other gas 1 fuels. There are no emission limits for boilers in the Gas 1 classification other than work practice standards. The work practice standards require a tune-up performed in accordance with 40 CFR 63.7540(a)(10).

EMISSIONS:

Emissions will not be affected as a result of this modification.

TITLE V MODIFICATION:

The proposed changes should be classified as a major modification of the Title V Operating Permit since there would be a change in the monitoring requirements. A 30 day public comment period and a 45 day EPA comment period would be required. The Title V Operating Permit would not be

modified until after the completion of these comment periods. The modifications would be incorporated into the Title V permit upon completion of the EPA review.

RECOMMENDATIONS:

I recommend that the Title V Operating Permit be modified as attached.



Jeremy Weant
Industrial Chemical Section
Chemicals Branch

November 7, 2016
Date