

Statement of Basis
Georgia-Pacific Alabama River Cellulose
Facility No. 106-0010
CCA Significant Modification

Introduction

The Department received an application on October 24, 2022, from Georgia-Pacific Alabama River Cellulose (ARC) located in Perdue Hill, AL for a proposal to modify their current Title V Major Source Operating Permit (MSOP). An updated application was received on December 16, 2022. The current MSOP was issued on November 9, 2022, and expires on November 8, 2027. The facility is located in Monroe County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

On May 30, 2022, ARC submitted a request for approval of a Clean Condensate Alternative (CCA) plan to over-collect methanol in the condensate collection system to offset intermittent releases from the No. 8 Oxygen Delignification Surge Tank. The minimum condensate collection requirement will be increased from 11.1 pounds of methanol per oven dried ton of pulp ($\text{lb}_{\text{MeOH}}/\text{ODTP}$) to 11.5 $\text{lb}_{\text{MeOH}}/\text{ODTP}$ while the No. 8 Mill is in operation. To be eligible for approval, the CCA must demonstrate that emission reductions are greater than would have been achieved through compliance with the high volume, low concentration collection and control requirements. The Department granted approval of the plan on June 23, 2022, pursuant to 40 CFR §63.447. There will be no increase in emissions as part of this Title V modification.

The Mill has proposed the following revisions and conditions in order to incorporate the CCA plan into the MSOP:

- Clarified that the emissions from the No. 8 Oxygen Delignification Surge Tank are exempt from enclosure and closed-vent system requirements of Chapter 19 – Pulping System Processes.
- Incorporated the approved CCA Plan collection limit of 11.5 pounds per ton of oven-dried pulp when the No. 8 Pulp Mill is operating in Chapter 20 – Process Condensates.
- Clarified that the emissions from the No. 8 Oxygen Delignification Surge Tank are exempt from enclosure and closed-vent system requirements of Chapter 21 – Enclosures and Closed-Vent Systems.

Title V Modification

The proposed changes should be classified as a significant modification to the Title V Operating Permit as defined in 335-3-16-.13(4). A 30 day public comment period and a 45 day EPA comment period would be required. The modifications would be incorporated into the Title V permit upon completion of the review periods.

Recommendations

I recommend that Georgia-Pacific Alabama River Cellulose's Title V MSOP be modified as attached.



Steven Bissey
Industrial Chemical Section
Chemicals Branch

January 9, 2023

Date