

**Statement of Basis
Georgia-Pacific Brewton Mill
Facility No. 502-0001
Significant Title V Mod**

Introduction

Georgia-Pacific Brewton (Brewton, or the Mill), located in Brewton, Alabama (Escambia County), owns and operates an integrated Kraft pulp and containerboard mill. The Mill is a major source of air emissions under the Title V Major Source Operating Permit (MSOP) program and operates under Title V MSOP No. 502-0001. The current MSOP was issued and effective on January 1, 2023, and expires on December 31, 2027. On May 28, 2024, December 18, 2024, and June 5, 2026, the Department received applications from Brewton for proposals to modify their Title V MSOP. This is the first modification of the third renewal.

Proposed Changes

On November 11, 2011, Brewton submitted an application for the replacement of multiple pulp digesters. The Department determined that this qualified as a 502(b)(10) and did not require a permit, and requested Brewton inform the Department which digesters were replaced for incorporation into the Title V permit. The Department was informed on May 28, 2024, that Digester No. 9 had been replaced. The following revisions will be made to the MSOP in the section 11 Batch Digesters (Hardwood, Softwood, and High Yield):

- Updated the installation date of Digester No. 9 to 2024.
- Added Digester No. 9 to the units subject to 40 CFR 60 Subpart BBa.
- State only enforceable provisos were removed since all digesters are now subject to federally enforceable provisos under the New Source Performance Standards.

On June 5, 2026, the Mill requested the following construction permits be incorporated into the Title V permit. The equipment associated with each of these permits has been constructed and began operations.

- Air Permit 502-0001-X046 – No. 3 Lime Kiln was re-issued on January 8, 2024. Notice of construction completion was received on October 8, 2024. Authorization to Operate was issued on July 28, 2025.
- Air Permit 502-0001-X052 – No. 3 Lime Kiln Emergency Engine was issued on August 19, 2024. Notice of construction completion was received on September 4, 2024. Authorization to Operate was issued on July 28, 2025.
- Air Permit 502-0001-X050 – Tall Oil Plant was re-issued on September 12, 2024. Notice of construction completion was received on October 11, 2024. Authorization to Operate was issued on February 24, 2026.
- Air Permit 502-0001-X053 – Warehouse Emergency Fire Water Pump was issued on March 18, 2025. Notice of construction completion was received on September 5, 2025. Authorization to Operate was issued on February 24, 2026.

- Air Permit X054 – IT Emergency Generator was issued on April 17, 2025. Notice of construction completion was received on April 17, 2025. Authorization to Operate was issued on July 28, 2025.

The Department was notified on November 20, 2024, that the No. 1 Lime Kiln was shut down permanently and that the No. 2 Lime Kiln would be permanently shut down once the No. 3 Lime Kiln non-condensable gas (NCG) burner was tested. On December 18, 2024, the Department granted a request for a flexibility modification to allow the use of the No. 3 Lime Kiln as a control device for the low volume high concentration (LVHC) gases from the digesters and evaporators. This change will be incorporated as part of this modification. The following changes will also be made to the MSOP:

- No. 1 Lime Kiln – Removed from the MSOP. This section was replaced by Air Permit 502-0001-X046 – No. 3 Lime Kiln.
- No. 2 Lime Kiln – Removed from the MSOP. In the Table of Contents, this section was changed to “Intentionally Left Blank.”
- 11 Batch Digesters (Hardwood, Softwood, and High Yield) – On the Informational Summary, specified the operating capacity units as “lb/hr ODTUBP.”
- 11 Batch Digesters (Hardwood, Softwood, and High Yield) – In Emission Standards Proviso 1 and 2, replaced “the No 1. Lime Kiln or the No. 2 Lime Kiln” with “the No. 3 Lime Kiln.”
- No. 4 Multiple Effect Evaporator System – In Emission Standards Proviso 1, replaced “the No 1. Lime Kiln or the No. 2 Lime Kiln” with “No. 3 Lime Kiln.”
- Pulping System Processes – In Emission Standards Proviso 1, replaced “the Nos. 1 or 2 Lime Kilns” with “the No. 3 Lime Kiln.”
- Pulping System Processes – In Emission Standards Proviso 2, replaced “the lime kiln” with “the No. 3 Lime Kiln.”

Air Permit 502-0001-X050 will be incorporated into the MSOP section Tall Oil Plant. The following changes will also be made to the MSOP:

- On the Informational Summary, updated the Operating Capacity to 10,000 lb/hr and changed the total reduced sulfur (TRS) limit to a Prevention of Significant Deterioration synthetic minor limit.
- Added several provisos from Air Permit 502-0001-X050 for TRS emission standards, compliance methods and procedures, monitoring, recordkeeping, and reporting requirements.

Air Permits 502-0001-X052, X053 and X054 will be incorporated into the MSOP section RICE Generators. The following changes will be also made to the MSOP:

- Several provisos were revised to more accurately reflect the language used in 40 CFR 60 Subparts IIII and JJJJ and 40 CFR 63 Subpart ZZZZ.
- Added provisos from Air Permits 502-0001-X052, X053, and X054. Several provisos from Air Permits X053 and X054 were combined with existing provisos applicable only to Emission Units X040-7 and X051.

- Several provisos were moved to different subsections.
- Several citations have been corrected.

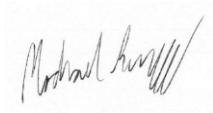
On July 6, 2026, the Mill requested that Emission Units X040-3 Lime Kiln Spare Emergency Engine, X040-4 No. 1 Lime Kiln Emergency Engine, and X040-5 No. 2 Lime Kiln Emergency Engine be removed from the Title V MSOP. These units were permanently shut down in October 2024 upon startup of the No. 3 Lime Kiln. These units will be removed from the Title V MSOP.

Title V Modification

The proposed changes should be classified as a significant modification to the Title V Operating Permit. 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 EPA review.

Recommendations

I recommend that Georgia-Pacific Brewton Mill's Title V permit be modified as attached.



Michael Bragg
Industrial Chemicals Section
Chemical Branch

July 7, 2026
Date