

# State of Mississippi



## AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

## THIS CERTIFIES

Georgia Pacific Monticello LLC 604 N A Sandifer Highway Monticello, MS Lawrence County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: JUL 2 2 2011

Expires:

Permit No. 1500-00007

Agency Interest # 1631

\*\*\* Official MDEQ Permit - Version 1.1 \*\*\*

## **Table of Contents**

Subject Item Inventory	
Facility Requirements.	]
General Information	<b>L</b> -
Other Relevant Documents:	

Georgia Pacific Monticello LLC Subject Item Inventory Permit Number:1500-00007 Activity ID No.: PER20100001

# **Subject Item Inventory:**

ID	Designation	Description
AI1631		
AREA6	AA-525	Raw Pet Coke Storage Pile
AREA7	AA-521	Raw Pet Coke Transfer Point
AREA8	AA-522	Raw Pet Coke Transfer Point
AREA9	AA-523	Raw Pet Coke Transfer Point
AREA10	AA-524	Raw Pet Coke Transfer Point
CONT1	AA-517	Raw Pet Coke Storage Silo equipped with a baghouse
CONT2	AA-518	Pulverized Pet Coke Storage Silo equipped with a baghouse
CONT3	AA-519	Pet Coke Grinding Mill equipped with a baghouse
EQPT43		White Liquor Storage Tank
EQPT44		All Liquor Storage Tank
EQPT45		Black Liquor Storage Tanks
EQPT46		Foam Tank Vents
EQPT47		Soap Storage Tanks
EQPT48		Tall Oil Black Liquor Tanks
EQPT49		Black Liquor Storage Basin
EQPT51	AA-526	Pet Coke Air Heater
EQPT53	AA-802	1000 hp diesel fired engine used to operate the portable chipper
EQPT54	AA-803	Portable Debarker and Chipper with a 110 tons/hr capacity
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Georgia Pacific Monticello LLC Subject Item Inventory Permit Number:1500-00007 Activity ID No.: PER20100001

ID	Designation	Description
EQPT55	AA-801	325 hp diesel fired Portable Debarker Engine

### **Subject Item Groups:**

ID	Description	Components
GRPT1	Raw Pet Coke Transfer Points	AREA10 Raw Pet Coke Transfer Point
		AREA7 Raw Pet Coke Transfer Point
		AREA8 Raw Pet Coke Transfer Point
		AREA9 Raw Pet Coke Transfer Point
GRPT2	Portable Debarker and Chipper Operation	EQPT53 1000 hp diesel fired engine used to operate the portable chipper
		EQPT54 Portable Debarker and Chipper with a 110 tons/hr capacity
		EQPT55 325 hp diesel fired Portable Debarker Engine

KEY	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	MAFO = Animal Feeding Operation
RPNT = Release Point	TRMT = Treatment

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 1 of 7

### AI0000001631:

# Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.
	The described certifications only need to be submitted after the initial transport of the equipment onsite. [APC-S-2 V.D]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.C(2)]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(3)]

# Narrative Requirements:

### **General Condition:**

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [APC-S-2 V.A]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 2 of 7

#### **AI0000001631** (continued):

### Narrative Requirements:

#### **General Condition:**

T-8

T-9

T-10

Condition No.	Condition
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials:  a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and  b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistant violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [APC-S-2 II.C]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]
Condition No.	Condition

pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [APC-S-2 II.B(5)]

General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued

General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be

General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 3 of 7

### AI0000001631 (continued):

# Narrative Requirements:

<u> </u>	
Condition No.	Condition
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [APC-S-2 II.B(7)]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.B(15)c]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(1)]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [APC-S-2 V.D(3)]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 4 of 7

### AI000001631 (continued):

# Narrative Requirements:

Condition No.	Condition
T-20	General Condition: Except as prohibited in APC-S-2, Section V.D.7, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]
T-21	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [APC-S-2 V.D(5)]
T-22	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [APC-S-2 V.D(6)]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [APC-S-2 V.D(7)]
T-24	General Condition: Regarding compliance testing:  (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.  (b) Compliance testing will be performed at the expense of the permittee.  (c) Each emission sampling and analysis report shall include but not be limited to the following:  1. detailed description of testing procedures;  2. sample calculation(s);  3. results; and  4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [APC-S-2 VI.B(3, 4 and 6)]
T-25	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [APC-S-2 V.A(4)]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 5 of 7

### EQPT000000054 (AA-803) Portable Debarker and Chipper with a 110 tons/hr capacity:

# Limitation Requirements:

Condition No.	n Parameter	Condition
L-1		For Emissio Point AA-803, the permittee shall not cause to emit particulate matter emissions (PM) which exceed the relationship of: $E = 4.1(P)^{\circ}0.67$
		Where E= allowable emission rate (lb/hr), and P= process input weight rate, as determined by an approved EPA Test Method. [APC-S-1 3.6(a)]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 6 of 7

## GRPT0000000002 (AA-800) Portable Debarker and Chipper Operation:

# Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		For Emission Points AA-801, AA-802, and AA-803, the permittee shall limit the hours of operation to less than 4400 hours per year. [APC-S-2]
L-2		For Emission Points AA-801, AA-802, and AA-803, the permittee shall limit the combined emissions of nitrogen oxide (NOx) emissions to less than 39.9 tons per year. [APC-S-2]
L-3		For Emission Points AA-801, AA-802, and AA-803, the permittee shall limit the combined emissions of particulate matter 2.5 emissions to less than 9.9 tons per year. [APC-S-2]
L-4		For Emission Points AA-801, AA-802, and AA-803, the permittee shall limit opacity to less than 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1]
L-5		For Emission Points AA-801 and AA-802, the permittee shall limit particulate matter emissions to less than 0.6 lb/MMBTU as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A. [APC-S-1 3.4(a)]
L-6		For Emission Points AA-801 and AA-802, the permttee shall limit the discharge sulfur dioxide to less than 4.8 lbs SO2/MMBTU as determined by EPA Test Method 6, 40 CFR 60, Appendix A. [APC-S-1 4]

## Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Points AA-801, AA-802, AA-803, the permittee shall record the hours of operation on both a daily basis and a consecutive 365-day period rolling total. These daily records shall be kept in log form, detailing the hours of operation for the units both on both a daily basis and a consecutive 365-day period total. Records must be made available for review upon request during any inspection visit by DEQ personnel. All records shall be maintained by the permittee for a period of five years following the date of such record. [APC-S-2]

Georgia Pacific Monticello LLC Facility Requirements Permit Number:1500-00007 Activity ID No.: PER20100001

Page 7 of 7

### **GRPT0000000002** (continued):

# Narrative Requirements:

Condition				
No.	Condition			
T-1	For Emission Points AA-801 and AA-802, the permittee shall comply with the following limits specified in 40 CFR 89 for nonroad engines:			
	Nitrogen oxide emissions shall not exceed 9.2 g/kW-hr.			
	Hydrocarbon emissions shall not exceed 1.3 g/kW-hr.			
	Carbon monoxide emissions shall not exceed 11.4 g/kW-hr.			
	Particulate matter emissions shall not exceed 0.54 g/kW-hr.			
	For Emission Point AA-801, these limits are applicable to the 325 hp debarker engine units 2001 model year and older. For Emission Point AA-802, these limits are applicable to the 1000 hp chipper engine units 2005 and older.			
	For Emission Points AA-801 and AA-802, the permittee shall verify the engine certifications prior to bringing the units on-site. A copy of the certifications shall remain on site for a period of five years and shall be made available to the Department upon request. [APC-S-2]			
T-2	For Emission Points AA-801 and AA-802, the permttee shall limit sulfur content of the fuel oil to less than 15 ppm. The permittee is limited to combusting diesel fuels which comply with the standard. (Air Ref.: 40 CFR 80). [Other]			

## **GENERAL INFORMATION**

Georgia Pacific Monticello LLC 604 N A Sandifer Highway Monticello, MS Lawrence County

### **Alternate/Historic Identifiers**

ID	Alternate/Historic Name	User Group	Start Date	End Date
1631	Georgia Pacific Monticello, LLC	Official Site Name	1/27/2009	
2807700007	Georgia Pacific, Monticello Mill	Air-AIRS AFS	10/12/2000	
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Construction	2/3/1999	2/3/1999
150000007	Georgia Pacific Corporation, Monticello Mill	Air-State Operating	7/11/1995	10/1/1996
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Construction	11/3/1999	11/3/1999
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Construction	3/14/2000	
MSR110077	Georgia Pacific Corporation, Monticello Mill	GP-Sara Title III	11/10/1992	10/23/2000
MS0002941	Georgia Pacific Corporation, Monticello Mill	Water - NPDES	3/9/2000	2/28/2005
MS0002941	Georgia Pacific Corporation, Monticello Mill	Water - NPDES	5/12/1997	12/13/1998
MS0002941	Georgia Pacific Corporation, Monticello Mill	Water - NPDES	12/14/1993	12/13/1998
MS0002941	Georgia Pacific Corporation, Monticello Mill	Water - NPDES	6/9/2000	2/28/2005
MSD043435742	Georgia Pacific Corporation, Monticello Mill	Hazardous Waste-EPA ID	6/3/1996	
SW0390040441	Georgia Pacific Corporation, Monticello Mill	SolidWaste - NonMSW Landfill	6/11/1996	6/11/2006
MSR110077	Georgia Pacific Corporation, Monticello Mill	GP-Sara Title III	10/23/2000	9/11/2005
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Title V Operating	7/9/2003	1/27/2009
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Construction	7/9/2003	
150000007	Georgia Pacific Corporation, Monticello Mill	Air-Construction	3/4/2005	
MS0002941	Georgia Pacific Corporation, Monticello Mill	Water - NPDES	7/27/2005	1/26/2009
MSR110077	Georgia Pacific Corporation, Monticello Mill	GP-Baseline	12/28/2005	11/15/2010
150000007	Georgia Pacific Monticello, LLC	Air-Title V Fee Customer	9/7/2003	
1631	Georgia Pacific Corporation, Monticello Mill	Air-Notification	1/8/2009	
1631	Georgia Pacific Corporation	Air-Notification	8/19/2008	
1631	Georgia Pacific	Air-Notification	11/10/2008	

# **GENERAL INFORMATION**

ID	Alternate/Historic Name	User Group	Start Date	End Date
1631	Georgia Pacific Corporation	Historic Site Name	11/10/1992	1/27/2009
150000007	Georgia Pacific Monticello LLC	Air-Title V Operating	1/27/2009	
MS0002941	Georgia Pacific Monticello LLC	Water - NPDES	1/27/2009	6/30/2010
1631	Intermediate black liquor storage tank	Air-Notification	11/25/2009	
150000007	Georgia Pacific Monticello LLC	Air-Construction	11/24/2009	
CELMKODFE14LJP2	Georgia Pacific Corporation, Landfill Berm	COE Public Notice/ Permit Number	1/5/1995	1/26/1995
WQC1994135	Georgia Pacific Corporation, Landfill Berm	WQC Number	2/21/1995	
MSR110077	Georgia Pacific Monticello, LLC	GP-Baseline	11/15/2010	9/28/2015
1631	Annual Georgia Pacific Monticello LLC	Air-Notification	1/11/2011	
150000007	Georgia Pacific Monticello LLC	Air-Construction	7/22/2011	

**Basin:** Pearl River Basin

Location Description: PG- Plant Entrance (General). Data collected by Mike Hardy on 11/17/2005. Elevation 254 feet. Just inside first gate.