

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

April 9, 2013

PERMIT TO INSTALL
32-13

ISSUED TO
Georgia-Pacific, LLC

LOCATED AT
former Crown Vantage Paper Mill
Between Hercules Avenue and Commerce Avenue
Parchment, Michigan

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER
B1679

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

February 22, 2013

DATE PERMIT TO INSTALL APPROVED:

April 9, 2013

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

**PERMIT TO INSTALL
Common Abbreviations / Acronyms**

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO _{2e}	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUSOIL	Soil vapor extraction wells, air sparging, vacuum blower(s), and an air flow distribution system equipped with a vapor phase regenerative granulated activated carbon system.	FGREMEDATE
EUGROUNDWATER	Tray air stripping tower, pump(s), groundwater flow distribution system and an "oil-water" separator. The vapor off the stripping tower is combined with the air from the soil vapor extraction system and sent through the vapor phase regenerative granulated activated carbon system.	FGREMEDATE
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.		

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGREMEDATE	Soil vapor extraction wells, air sparging, vacuum blower(s), and an air flow distribution system equipped with a vapor phase regenerative granulated activated carbon system. Tray air stripping tower, pump(s), groundwater flow distribution system and an "oil-water" separator. The vapor off the stripping tower is combined with the air from the soil vapor extraction system and sent through the vapor phase regenerative granulated activated carbon system.	EUSOIL and EUGROUNDWATER
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: FGREMEDIATE

DESCRIPTION: Soil vapor extraction wells, air sparging, vacuum blower(s), and an air flow distribution system equipped with a vapor phase regenerative granulated activated carbon system. Tray air stripping tower, pump(s), groundwater flow distribution system and an “oil-water” separator. The vapor off the stripping tower is combined with the air from the soil vapor extraction system and sent through the vapor phase regenerative granulated activated carbon system.

Emission Units: EUSOIL and EUGROUNDWATER

POLLUTION CONTROL EQUIPMENT: Vapor phase regenerative granulated activated carbon system consisting of one set of two carbon vessels. Additional control will be operated when the subsurface temperature is 190°F or greater on a steady basis. This control will consist of one set of two non-generative (i.e. “sacrificial”) carbon vessels in-series.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	0.5 tpy	12-month rolling time period as determined at the end of each calendar month.	FGREMEDIATE	SC VI.2	R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FGREMEDIATE unless the regenerative granulated activated carbon system is installed, maintained, and operated in a satisfactory manner. **(R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not operate FGREMEDIATE unless the “sacrificial” carbon system is installed and maintained. This carbon system shall be used for no less than 20 days, in a satisfactory manner, once the subsurface temperature reaches 190 degrees Fahrenheit on a steady basis. **(R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall test, in a satisfactory manner, the regenerative activated carbon system for breakthrough of the first carbon vessel at least once every week, except when the subsurface temperature is 190 degrees Fahrenheit (°F) or greater on a steady basis. During that scenario, the permittee shall test for breakthrough a minimum of once per day. The permittee shall evaluate breakthrough via Tedlar bag

sampling followed by laboratory analysis; by use of a hand-held instrument capable of detecting concentrations at the levels expected; or an equivalent method.

For the scenario of subsurface temperature being below 190 °F, breakthrough is considered a reading at a point immediately following the regenerative carbon system that is 20 percent or more of the vapor influent concentration into the regenerative carbon system. If breakthrough is detected, the permittee shall route the vapor flow through the second carbon vessel of the regenerative carbon system and begin regenerating the first carbon vessel. The permittee shall repeat the initial test each time vapor flow to the regenerative carbon vessels is switched from one vessel to the other and shall use the resulting influent concentration to establish breakthrough.

For the scenario of subsurface temperature being 190 °F or greater, breakthrough is still considered a reading at the point a point immediately following the regenerative carbon system that is 20 percent or more of the influent concentration into the regenerative carbon system. However, the frequency of monitoring for breakthrough shall be once per day. If breakthrough is detected, the permittee shall route the vapor flow through the second carbon vessel of the regenerative carbon system and begin regenerating the first carbon vessel. The permittee shall repeat the initial test each time vapor flow to the regenerative carbon vessels is switched from one vessel to the other and shall use the resulting influent concentration to establish breakthrough.

The permittee shall submit any request for a change in the testing frequency to the AQD District Supervisor for review and approval. **(R 336.1225, R 336.1702(a), R 336.1910)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall monitor and record, in a satisfactory manner, the flow rate and the total VOC concentration of the vapor stream(s) to the vapor phase regenerative carbon system. This shall be done on a weekly basis until four valid samples, which pass all quality assurance and quality control requirements have been obtained. Thereafter, the permittee shall monitor the concentration of the vapor stream(s) to the vapor phase regenerative carbon system for these parameters on a monthly basis. The permittee shall submit any request for a change in the sampling frequency to the AQD District Supervisor for review and approval. **(R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period calculations of VOC emission rates for FGREMEDIATE, as required by SC I.1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV1	10	15	R 336.1225

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**APPENDIX APPENDIX1
 Soil Remediation Emission Calculation and Recordkeeping**

Source Name		Contact Person	
<u>Location</u>		County	
Recordkeeping Period		Permit Number	Pollutant(s)
<u>Start Date</u>	End Date		

	V	C	E_s	P_s
Date	Air Volume Flow Rate (ft³/min)	Inlet Concentration (mg/m³)¹	Control Efficiency (Percent)	VOC Emissions (lbs/hr)²
<i>EXAMPLE</i>	1,000	10,000	95	1.9

¹ Parts per million (ppm) in air is by volume and does not equal milligrams per liter (mg/l).

² Identify which pollutant the emissions are being calculated for.

EQUATION TO CALCULATE EMISSIONS:

$$P_s \frac{\text{lbs}}{\text{hr}} = V \frac{\text{ft}^3}{\text{min}} \times 0.02832 \frac{\text{m}^3}{\text{ft}^3} \times 60 \frac{\text{min}}{\text{hr}} \times C \frac{\text{mg}}{\text{m}^3} \times 0.001 \frac{\text{g}}{\text{mg}} \times 0.002205 \frac{\text{lbs}}{\text{g}} \times \frac{(100 - E_s)}{100}$$

Signature: _____

Date: _____

Telephone No.: _____