

Proposed significant permit modification of Air Quality Title V Permit for Georgia-Pacific Consumer Products LP – Wauna Mill



The purpose of this public notice is to invite you to submit comments on this proposed permit modification.

DEQ's Role:

The Oregon Department of Environmental Quality (DEQ) is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities. DEQ issues permits to regulate the type and amount of air emissions at a regulated facility.

Comments due:

Written comments due: 5 p.m, October 8, 2010

Where can I send my comments?

Catherine Blaine, Permit Coordinator
(503) 229-5582 or 1-800-452-4011
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201
Fax: 503-229-6945 Phone: 503-229-5582
E-Mail: NWRAQPermits@deq.state.or.us

Where can I get technical information?

George Davis, Environmental Engineer
503-229-5534 or 1-800-452-4011
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201
Fax: 503-229-6945
Email: davis.george@deq.state.or.us

Where can I get background information?

The draft permit and draft review report are viewable online by clicking the following link(s):

[Draft Permit, part 1](#)
[Draft Permit, part 2](#)
[Draft Permit, part 3](#)
[Draft Review Report](#)
[Baseline Detail Sheet](#)
[PSEL Detail Sheet](#)

You can review hard copies of the draft permit and review report at the Clatskanie Public Library located at 11 Lillich, Clatskanie, Oregon. The draft permit, draft review report and the application are available for viewing at the DEQ Northwest Region Office, located at 2020 SW Fourth Avenue, Suite 400, Portland, Oregon 97201. For a review appointment, call Susan Curry at (503) 229-5554.

What is proposed?

DEQ proposes to modify the air permit for Georgia-Pacific Consumer Products LP and is inviting public comment on the proposed permitting action. During the comment period the public is invited to make comments related to specific conditions within the proposed permit.

The main function of this permit action is to modify the permit to account for completion of a project that eliminates the use of the Noncondensable Gas incinerator and a natural gas-fired package boiler.

Permit expiration

Oregon law requires facilities with a Title V Permit to renew that permit every five years. Since the permit is open for significant modification, the Department has decided to renew this permit at the same time. This permit expires on 05/01/2014.

Who is the applicant?

Georgia-Pacific Consumer Products LP, Wauna Mill

Where is the facility located?

The facility is located approximately 9.5 miles west of Clatskanie on Highway 30. The mailing address is:
92326 Taylorville Road
Clatskanie, OR 97016

Northwest Region
Air Quality
2020 SW Fourth Avenue
Suite 400
Portland, OR 97201

Phone: (503) 229-5263
(800) 452-4011
Fax: (503) 229-6945
Contact: George Davis
E-mail: davis.george@deq.state.or.us

www.oregon.gov/DEQ

If you received a hard copy of this notice in the mail, please consider receiving updates via e-mail instead. Send your request to: subscriptions@deq.state.or.us

Please include your full name, e-mail address and mailing address so that we can purge you from our print mailing list, thus saving trees and taxpayer dollars.

Who might have an interest?

People who work, live, and recreate in the area.

What does Georgia-Pacific do that affects air quality?

The Wauna mill is a Kraft process pulp and paper mill, and is major source of air pollutants.

The Wauna mill releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NOx), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), and Hazardous Air Pollutants (HAPs) to the air.

The major processes that emit these pollutants are fossil-fuel boilers, a recovery furnace, and a lime kiln; in addition there are a number of smaller emissions sources.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200-268 contains all pertinent rules that govern the air quality program.

How does DEQ determine what requirements go in the permit?

Various federal and state regulations apply to a facility depending on the type of industry, the type and amount of pollutants emitted, and the location of the facility. All applicable regulations must be contained in the permit, including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

Meeting air quality standards

Air quality in the Clatskanie area meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined that the air emissions from the Wauna mill will not result in a violation of those standards. DEQ is responsible for establishing permit emissions limits that ensure air quality standards are not violated.

What pollutants are considered in determining permitted limits?

EPA and DEQ use six key pollutants as indicators of air quality. These are known as “criteria pollutants” and are compounds that, if inhaled, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is

greater than a regulated minimum, then emission limits are established.

Hazardous air pollutants (HAPs) are compounds that, if inhaled, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA has established a list of 187 compounds that are classified and regulated as HAPs. If the amount of HAPs released is greater than a regulated minimum level, then additional requirements may also apply.

For more information about criteria pollutants, go to:

<http://www.deq.state.or.us/aq/forms/annrpt.htm>

For more information about hazardous air pollutants, go to:

www.epa.gov/ttn/atw/hlthef/hapindex.html

How are the permitted substances measured?

Permitted emissions are estimated using calculations specified in the permit, and some are measured by periodic emission testing.

Emissions and permit limits

The proposed Plant Site Emission Limits (PSELs) are lower than the current PSELs, because of recalculation of emissions using updated emission factors and elimination of fuel oil usage in the Power Boiler.

Table 1 below presents the maximum allowable emissions for the facility. The Current Emission Limit reflects the maximum amount of emissions the facility can currently emit under their existing permit. The Proposed Emission Limit reflects the maximum amount of emissions the facility would be able to emit under the proposed permit. Typically, a facility’s actual emissions are less than the maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Georgia-Pacific’s Wauna Mill is a major source of HAPs. As a major source, the mill is subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAPs): Subparts S and MM. Table 2 below presents the estimated HAP emissions for the facility.



Compliance history:

Since issuance of the current permit, the following enforcement action has been taken:

Warning letter WL-POR-AQ-2010-0043, dated June 15, 2010, was sent for violation of two permit conditions. Condition 150.e. in Part 1 of the permit requires notification of planned startup/shutdown or scheduled maintenance events. Condition 151 requires that deviations from permit requirements that do not cause excess emissions be reported to DEQ within 15 days of the deviation occurring. Georgia-Pacific did not provide the required notifications of planned startup/shutdown or scheduled maintenance events from the time the permit was renewed on June 18, 2009, through the end of 2009, in violation of condition 150.e. These permit deviations were not discovered and reported until the 2009 annual report was completed, in violation of condition 151.

These violations have been corrected.

What are the special conditions of this permit?

There are no special conditions in the permit.

What other DEQ permits are required?

Other permits issued or required by the Department include a Water Quality NPDES Permit No. 101172 and Stormwater Permits No. 10187 and 21228. The facility is registered as a Small Quantity Hazardous Waste Generator and is regulated by DEQ's Hazardous Waste program.

What other sources of air pollutants are in the vicinity of the facility?

The nearest other source are the PGE Beaver and Port Westward power plants at 80997 Kallunki Road, Clatskanie. A number of other sources are located in Longview, Washington.

Various sources emit similar air pollutants. EPA and DEQ split up the sources into 3 categories: point, area, and mobile sources. Point sources are primarily large industrial facilities. Area

sources are smaller than point sources and include backyard burning, woodstoves, consumer products, gasoline stations, etc. Mobile sources include cars, trucks, airplanes, ships, railroads, and construction equipment.

What happens next?

DEQ will consider and provide responses to all comments received at the hearing or by the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit following EPA review.

After the public comment period, DEQ will send the proposed permit to EPA. EPA will have 45 days to review the proposed permit and submit any objections to DEQ in writing. If EPA has no formal objections, any person may petition EPA with an objection during the following 60 days. A petition may only be based on objections already raised during the public comment period, unless the person submitting the petition can demonstrate it was impossible or impractical to do so, or that new information is now available to justify a new objection.

Accessibility information

DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Communications & Outreach (503) 229-5696 or toll free in Oregon at (800) 452-4011; fax to (503) 229-6762; or e-mail to deqinfo@deq.state.or.us.

People with hearing impairments may call DEQ's TTY number, 503-229-5471.

Table 1

Criteria Pollutant	Current PSELS (tons/yr)	Proposed PSELS (tons/yr)
Particulate Matter (PM)	1,077	1,077
Particulate Matter 10 µm and less (PM ₁₀)	1,077	1,077
Particulate Matter 2.5 µm and less (PM _{2.5})	n/a	1,077
Nitrogen Oxides (NO _x)	2,165	2,139
Sulfur Dioxide (SO ₂)	1,072	913
Carbon Monoxide (CO)	5,343	5,206
Volatile Organic Compounds (VOC)	848	849

Table 2

Hazardous Air Pollutants	2006 Estimated Emissions (tons/yr)
Total HAPs	626
Methanol	442
Hydrogen Chloride	69
Hexachloroethane	20
Cresol/Cresylic Acid	18
Acetaldehyde	14