

Provisions of Commission Minute Order 76-39 required that prior to March 31, 1977, the Georgia-Pacific Corporation at Crossett would submit to this Department (1) plans for retirement of 5-R recovery boiler or (2) a permit application for reducing the emissions from the 5-R boiler.

On March 24, 1977 Georgia-Pacific submitted a proposal (copy attached) for maintaining compliance with provisions of Section 7 of the Air Code using an alternative approach, which approach relies heavily on continuous emission monitoring and appropriate adjustments in production rates and adjustments between operating processes.

The March 24, 1977 proposal is hereby approved and the previously mentioned March 31, 1977 deadline deferred subject to the following qualifications:

- (1) Emissions from the individual units of the Georgia-Pacific facility do not exceed the visible emission limits of the Air Code and
- (2) Georgia-Pacific submits sufficient emission monitoring information to the Department that compliance with the provisions of Section 7(a) of the Air Code can be demonstrated.

COMMIS-
SIONERS

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Billy F...
CHAIRMAN

SUBMITTED BY Jarrell E. Southall, Chief DATE PASSED 03/25/77
Division of Air Pollution Control



Georgia-Pacific Corporation

Crossett Division
P. O. Box 520
Crossett, Arkansas 71635
Telephone (501) 567-8111

March 24, 1977

Mr. S. Ladd Davies, Director
Department of Pollution Control & Ecology
8001 National Drive
Little Rock, Arkansas 72209

Attention: Mr. Jarrell Southall

Dear Mr. Davies:

Georgia-Pacific Corporation's Crossett Paper Operations proposes the following emission control strategy to comply with the Arkansas Air Code whereby ambient air standards will be attained and maintained by the end of 1977.

Prior to this time, our approach to emission control has been geared to individual unit emission rates and has resulted in focusing on our highest emission sources -- 5R, 6R, and 7R recovery furnaces which are equipped with an electrostatic precipitator. Of these, 5R is operated only intermittently dependent on the recovery outages. Your Minute Order 76-39 requires our commitments on 6R precipitator repair reducing emission from that source, and plans for reduction of emissions and permit application on 5R recovery unit or plans for retiring 5R unit by March 31, 1977. The projected emission rate from 6R will be reduced upon completion of the wire replacement project which is to be completed this week and the previous rebuild of the scrubber. The emission rate from 5R (when operated) will be brought back to design efficiency.

Our proposed control strategy addresses itself to the total plant emission rate at any given time. Daily computation of emissions will be made, and reported on a monthly basis. The method of computation will be based on steam flow, oil consumption, ash content of the oil as applied to each power boiler backed by testing. Emission rates for each recovery furnace will be based on design emission rates, liquor burned, and steam flow. These recovery units will be continuously monitored by sodium ion analyzers which will be calibrated by actual testing. This project will be done by temporary summer employees, and should be completed by August 31, 1977. Emission rates from 9A (wood waste) unit will be assigned according to design and in accordance with most recent tests. The lime kiln, lime slaker, and dissolving tank emission rates will be determined by venturi differential backed by testing, design, and time of operation.

We anticipate being at a total emission rate of 500 plus or minus 20 pounds per hour. If this range cannot be met for any reason, the Department will be notified as to the cause and duration of the variance.

March 24, 1977

TO: Mr. S. Ladd Davies, Director
Department of Pollution Control & Ecology

Attention: Mr. Jarrell Southall

(Con't.)

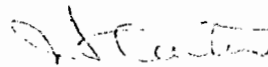
Attached for your consideration is a week's emission rate as computed by our proposed plan. It should be noted that slaker emission rates are at 40 pounds per hour. We intend to reduce this rate to five (5) pounds per hour, and a permit application will be submitted soon.

We have determined that our steam demand is greatest in winter months because of radiation losses and necessary steam tracing for equipment protection. It has been determined that we can produce the required steam demand by operating all units except 5R recovery furnace during this period, and that we can meet emission requirements. Even with 5R in service, we would be at approximately 523 pounds per hour emission rate.

The following comments are applicable to the conditions listed in the Amended Permit dated July 19, 1976:

- (1) We feel certain that this control strategy will result in reducing plant-wide emissions.
- (2) We will continue the monthly reports.
- (3) We do not think it will be necessary to take any units out of service under this proposal.
- (4) Again, we think 5R can be operated under this plan when needed without exceeding the ambient standards. In the event we find that we cannot operate 5R in compliance under this plan, we are prepared to make whatever changes are required to achieve compliance.
- (5) Repairs to 6R will be completed this week, and should be tested by the end of April, 1977.
- (6) We believe this is a better strategy for assuring full compliance with the Air Code.

Very truly yours,



J. S. Carter
Assistant Technical Director

JSC/rth
Enclosure

CC -- Mr. Jarrell Southall
Mr. Cecil Harrell
Mr. J. B. Jones

PROJECTED EMISSIONS

MARCH 1977

	6	7	8	9	10	11	12
1-A	0.8	0.5	0.7	1.0	0.8	0.6	0.8
2-A	0.7	0.6	1.1	0.3	0.7	0.7	0.7
3-A	1.0	1.1	1.0	1.1	1.1	1.0	1.0
4-A	1.9	1.7	1.9	2.2	1.8	1.9	1.9
5-A	1.6	1.6	1.2	1.4	1.8	1.9	1.5
6-A	3.3	3.0	3.8	3.9	3.8	3.6	3.6
9-A	80.0	80.0	80.0	80.0	80.0	80.0	80.0
5-R Boiler	0	0	211.0	184.0	191.0	41.0	0
5-R Dis	0	0	35.0	32.0	35.0	13.0	0
6-R Boiler	50.6	104.7	93.2	85.7	59.2	97.2	97.2
6-R Dis	4.3	10.3	9.2	7.0	2.0	10.3	10.3
7-R Boiler	67.2	54.3	50.3	63.6	68.6	63.0	63.3
7-R Dis	20.5	20.5	20.5	20.5	20.5	20.5	20.5
No. 2 Kiln	23.0	22.0	13.4	23.0	18.2	10.5	0
No. 3 Kiln	14.3	14.9	6.7	10.5	23.0	23.0	19.2
Caustic Rm.	40.0	40.0	35.0	40.0	40.0	21.1	40.0
TOTAL (lbs. per hr.)	311.2	357.3	502.7	392.6	377.5	390.8	340.7

