

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

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1828 Brandon Ave. SW
Roanoke, VA 24015

Thomas H. Berkeley, P.E.
Senior Environmental Engineer
South Central Regional Office
Department of Environmental Quality
7705 Timberlake Road
Lynchburg, VA 24502

Dear Mr. Berkeley:

Comments regarding the Draft Title V Operating Permit for Georgia-Pacific Corporation, Big Island, Virginia Permit NO. SCRO51-019-0003

I am submitting comments on behalf of the Board of Directors of the Blue Ridge Environmental Defense League. BREDL is a regional, community-based, non-profit environmental organization. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters throughout the Southeast, including five chapters in Virginia.

First, I want to commend the Georgia-Pacific Corporation for utilizing this facility in an environmental friendly way by using 100 percent recycled old corrugated containers in the manufacturing process. By using recycled material to produce paper, this facility is saving energy and much needed landfill space.

Second, I applaud the EPA Project XL that has been approved for the chemical recovery portion of this facility. As pointed out in the Final Project Agreement of May 31, 2000, if the gasification system is a success, emissions of NO_x, CO, VOC, and Particulates will be significantly reduced. In addition, steam generated by the gasifier may replace the steam needed from Boiler 6, the gas-fired boiler. Once completed, this project is anticipated to reduce the plantwide annual emissions by 139 tons for NO_x (just over a 14 percent plantwide reduction); 6973 tons for CO (nearly an 86 percent reduction); 12 tons for SO₂; 1595 tons for VOC (over a 74 percent reduction); and 391 tons for Particulates (over an 82 percent reduction).

The EPA Project XL will certainly make Georgia-Pacific a cleaner facility and would lower its ranking in Virginia as a huge source of emissions. Currently, this facility ranks 25th in Virginia for both NO_x (883 tpy) and SO₂ (1,359 tpy) emissions according to

EPA's AIRdata. For some reason, the EPA data did not include this facility under the VOCs and PM10 categories. However, based on the 2001 totals as mentioned in the S.O.B., this facility would rank around 5th in VOCs (1,919 tpy) emissions and 10th for PM10 (423 tpy) emissions in Virginia. By comparison, the proposed gas-fired Cogentrix power plant in Henry County, which is one of the largest of the proposed gas-fired plants in Virginia, would annually emit 446 tons of PM10, 229 tons of SO₂, 478 tons of NO_x, and 137 tons of VOCs.

Fortunately, the proposed Project XL will greatly improve the status of this facility. This is a positive step in the protection of citizen's health and improving the local air quality including the Class I protected James River Face Wilderness Area. However, there is still lots of room for improvement.

Permit contains high emission limits

The emission limits for the boilers have been set extremely high. The Statement of Basis on page 8 acknowledges for Boiler 4 (coal, oil) that the maximum emission rate for Particulate Matter is 0.05 lbs/MMBtu; whereas, the regulatory emission limit is 0.21 lbs/MMBtu. As the S.O.B. points out, "the permitted limit is more than 4 times the calculated maximum emission rate."

Boiler 5 (wastepaper pellets, wood, rubber, coal, used oil, Old Corrugated Container Reject, plytrim) emission limits for both criteria and hazardous air pollutants are "the worst case fueling scenarios for the boiler firing at capacity".

Boiler 6 (natural gas, propane, diesel fuel) has the same "worst case scenario" limit, but this boiler may be offset by the proposed Project XL.

In other words, the sky is the limit because there really are no limitations for the fuel burning equipment.

AP-42 references

The AP-42 references are vague. Since emission limits are based on this information, a more specific reference should be given. For example, EPA AP-42 chapter 10.3. This would help locate the information.

HAPs

Despite the fact that this facility emits more than 25 tpy of Hazardous Air Pollutants, HAPs emissions were not listed in the S.O.B. According to the 2000 Toxics Release Inventory, HAPs emissions included Acetaldehyde 116.2 tons, Benzene 83.5 tons, Hydrochloric acid 24.5 tons, Manganese compounds 2.8 tons, Methanol 245.3 tons,

and Methyl ethyl ketone 8.6 tons.

In addition, I have concerns over other toxins some that are either cancer-causing or probable cancer-causing. These include releases of dioxin and mercury, and the use of fuel containing PCBs, arsenic and lead.

PM 2.5

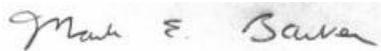
Virginia is not taking the lead in listing PM 2.5 emissions in the S.O.B. or permit. Now is the time to address the new Particulate Matter 2.5 standard. In a November 2002 letter from EPA to Regional Air Division Directors, the Agency “encourages States to take early action to reduce emissions of pollutants that cause violations of the NAAQS for ozone (the 8-hour standard) and PM 2.5 and that cause regional haze”.

In Conclusion

I commend and applaud the positive steps that have been taken by this facility to significantly lower emissions. Additional controls on criteria and hazardous air pollutants could make this a true and full example of a cleaner facility.

Please keep me posted as this Project XL is implemented.

Sincerely,

A handwritten signature in cursive script that reads "Mark E. Barker".

Mark E. Barker
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