DRAFT/PROPOSED Title V Air Operation Permit Revision
Permit No. 1070005-073-AV

APPLICANT

The applicant for this project is Georgia-Pacific Consumer Operations LLC. The applicant's responsible official and mailing address are: Gary Frost, Vice President, Georgia-Pacific Consumer Operations LLC, Palatka Mill, 215 County Road 216, Palatka, Florida 32178-0919.

FACILITY DESCRIPTION

The applicant operates the Palatka Mill, which is located at CR 216, west of US 17, Palatka, Florida. This facility is a Kraft pulp and paper mill that consists of major activities areas such as: chip handling, pulping, bleaching, chemical recovery, utilities, paper machines, converting, turpentine and tall oil production.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received June 29, 2012
Notice of Intent to Issue Air Permit issued August 29, 2012
Public Notice Published **[Month day, year]**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Units:

Emissions unit 014 is subject to CAM for the regulated emissions of NOx, which are controlled by a FGR System.

Emissions unit 016 is subject to CAM for the regulated emissions of particulate matter, which are controlled by an ESP.

Emissions unit 037 is subject to CAM for the regulated emissions of SO_2 and TRS, which are controlled by a scrubber.

PROJECT REVIEW

Following is a brief description of the changes that were made as part of this revision (073-AV) (replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.). Numerically listed is a discussion of the reasons for the changes being made as part of this project, followed by the conditions(s) being changed. The changes in the condition are with a ~~strikethrough format~~ for deletions.

1. Changes to Specific Condition D. 2.

D.2 **Authorized Fuels**. The No. 4 Lime Kiln is authorized to fire natural gas or residual fuel oil with a maximum fuel sulfur content of 2.35% by weight ~~as the primary fuel.~~ On-specification used oil meeting the requirements in Subsection S of this permit may be blended with the residual oil and fired at a rate of no more than 10% of the fuel consumed. ~~Natural gas is authorized as a startup and alternate fuel.~~The maximum heat input rate is ~~140 MMBtu per hour when firing a maximum of 933 gallons per hour of residual oil with a heating value of 150,000 Btu per gallon. No more than 8,173,000 gallons of oil shall be fired during any consecutive 12 months~~.

130 MMBtu/hours based on a 24- hour average. *{Permitting note: this is equivalent to approximately 867 gallons per hour of residual oil (base on a heating value of 150,000 Btu per gallon), or 130, 000 cubic ft of natural gas per hour (base on heating value of 1,000 Btu/gallon). }*

2. Changes to Specific Condition D. 8.

D.8. **Nitrogen Oxides (NOx) Emissions:** When firing any authorized fuel, NOx emissions shall not exceed:

114 ppmvd corrected to 10% oxygen based on a 30-day rolling average determined by CEMS data after completing the initial shakedown period.

This standard supersedes all previous BACT standards for NOx emissions from the No. 4 lime Kiln

[Construction Permit No. 1070005-067-AC, Rule 62-212.400 (BACT), F.A.C.]

Changes made to the permit based on comments received from facility engineer via email dated 09/14/12.

On September 14, 2012, the Department received a removal request to Specific Condition D.14 - for EP-017 (#4 Lime Kiln), annual compliance testing for NOx. Based on this request, the following changes were made:

SECTION III EMISSIONS UNITS AND SPECIFIC CONDITIONS:
Subsection D: Nitrogen Oxide Emissions Testing.

Specific Condition D.14 - for EP-017 (#4 Lime Kiln**),** removal of EPA Method 7E annual testing requirement for NOx.

CONCLUSION

This project revises Title V air operation permit No. 1070005-068-AV, which was issued on July 09, 2012. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.