FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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PERMITTEE

Georgia-Pacific Consumer Operations, LLC
Post Office Box 919
Palatka, Florida 32178

Air Permit No. 1070005-081-AC
Permit Expires: January 1, 2015
Minor Air Construction Permit

Authorized Representative:
Gary L. Frost, Vice-President Operations

Palatka Mill
Project: Replacement of Converting Department Baghouse with Drum Filtering System

PROJECT

This is the final air construction permit, which authorizes the removal of the existing baghouse and the installation of new drum filtering system that will control particulate matter emissions from 12 converting lines in the Converting Department. The proposed work will be conducted at the existing Palatka Mill, which is a Kraft pulp and paper mill categorized under Standard Industrial Classification Nos. 2611 and 2621. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates are Zone 17, 434.0 kilometers (km) East, and 3283.4 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Executed in Tallahassee, Florida

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for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

Enclosures
JFK/sa/ttm

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Gary L. Frost, Vice-President, Georgia-Pacific Consumer Operations: gary.frost@gapac.com
Mr. Ron Reynolds, Environmental Engineer, Georgia-Pacific Consumer Operations: ron.reynolds@gapac.com
Ms. Margarete M. Vest, P.E., Georgia-Pacific Consumer Operations: mmvest@gapac.com
Ms. Merrilee L. Palcic, Northeast District Office: merrilee.l.palcic@dep.state.fl.us
Ms. Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov
Ms. Heather Ceron, US EPA Region 4: ceron.heather@epa.gov
Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.
(Electronic Signature)

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FACILITY DESCRIPTION

Georgia-Pacific Consumer Operations, LLC (Georgia-Pacific) operates the existing Palatka Mill, which 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, and turpentine and tall oil production.

PROPOSED PROJECT

The applicant, Georgia-Pacific, requests authorization to replace the existing baghouse that controls emissions of particulate matter (PM) from 12 tissue converting lines in the Converting Department (EU 050) with a new drum filtering system. The new drum filtering system is designed with a slightly higher air flow capacity than the existing baghouse; 225,000 actual cubic feet per minute (acfm) versus 207,000 acfm. The new control equipment will not affect production of the 12 converting lines. The proposed project is scheduled to begin in August 2013 and initial startup in September 2013.

This project will modify the following emissions unit.

Facility ID No. 1070005	
EU No.	**Emission Unit Description**
050	Converting Department

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
- The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590. Phone: 904/256-1700, Fax: 904/256-1588.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation:

(a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

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9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

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B. Converting Department (EU 050)

This section of the permit addresses the following emissions unit (EU).

EU No.	Emission Unit Description
050	Converting Department

The Converting Department consists of paper core manufacturing activities and laminating/ply-bonding of embossed, multi-layered paper/tissue products. Paper core manufacturing activities take place within a web coating line where paper core stock is drawn from one or more rolls and glue is continuously applied along its length and overlapped to form the round paper cores. The embossing operation imposes a raised or depressed impression on a paper web by passing the web between two steel rolls or plates, one of which is engraved. Laminating/ply-bonding of embossed, multi-layered paper follows the embossing operation for the creation of multi-ply products, which adhesive is applied by a roller to bind multiple layers of substrate together.

The existing facility operates 12 converting lines at the mill that consist of slitting and rewinding operations. Converting Lines 1 – 10 is used to manufacture bath tissue and lines 2 – 4 are also used to manufacture paper towels. Currently, dust generated from the 12 converting lines is directed to a baghouse rated for 207,000 actual cubic feet per minute (acfm). The existing baghouse was installed in 1979. The baghouse consists of three distinct sections, with each section rated at 69,000 acfm of air flow from the converting lines. The clean exhaust air from the baghouse is returned to the Converting Building approximately 50% of the time during the year (mainly winter months) while the exhaust air from the baghouse is directed to the atmosphere during the summer months. Small quantities of fugitive VOC emissions are generated from the converting lines with the application of core glue and adhesives.

This minor air construction permit authorizes the replacement of the existing baghouse with a new drum filtering system. The new drum filtering system is an Osprey New BLUE-SKY Filter System (or equivalent to) that will be used to control emissions of PM from the 12 tissue converting lines. The new drum filtering system will consist of three drum filters, each operating at the same air flow rate of 69,000 dscfm (a total of 207,000 dscfm). This flow rate capacity equates to 225,000 acfm which is approximately 9% higher than the existing baghouse collection system.

In 2003, the Mill installed two new converting lines, referred to as the K-5 and K-6 Lines that process paper towels. Dusts generated from these two operations are directed to a baghouse rated for 67,000 acfm. Clean air exhausted from this baghouse is recycled to the Converting Building all year long. Small quantities of fugitive VOC emissions are generated from this converting line with the application of core glue and adhesives. This baghouse is not affected by this project.

{Permitting Note: This emission unit is subject to the applicable federal NESHAP provisions in Subparts A (General Provisions) and JJJJ (Paper and other Web Coating) of 40 CFR 63.}

EQUIPMENT

1. Drum Filtering System: The permittee is authorized to remove the existing baghouse and to install a new drum filtering system, Osprey BLUE-SKY Filter System (or equivalent to), in order to control emissions of PM from the existing 12 converting lines in the Converting Department. [Design and Application]

EMISSIONS STANDARDS

2. Visible Emissions: Visible emissions from the drum filtering system shall not exceed 5% opacity at all times.

   {Permitting Note: The drum filtering system is designed to control PM emissions to 0.003 grains/dry standard cubic foot. The 5% opacity limitation is consistent with the design specifications and provides reasonable assurance that annual emissions of $PM/PM_{10}/PM_{2.5}$ for all emission points in the drum filtering system. For information purposes, this equates to 23.2/11.6/9.2 tons/year respectively.}

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[Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

3. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

4. Initial Compliance Tests: The new drum filtering system shall be tested to demonstrate initial compliance with the emissions standards for opacity. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

5. Compliance Tests Prior To Renewal. Prior to obtaining a renewed Title V air operating permit, the permittee shall demonstrate compliance with the emissions standard for opacity. Tests shall be conducted in accordance with the same requirements as annual tests. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

6. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

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