FINAL Title V Air Operation Permit Revision
Permit No. 1070005-083-AV

APPLICANT

The applicant for this project is Georgia-Pacific Consumer Operations LLC. The applicant's responsible official and mailing address are: Mr. 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 permit is to revise Title V air operation permit No. 1070005-076-AV to incorporate the terms and conditions of permit Nos. 1070005-070-AC, 1070005-078-AC , update Subsection CC with the current regulations for 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, and update Appendices for NESHAP Part 61, Subpart A – General Provisions, NESHAP Part 63, Subpart A – General Provisions, NESHAP Part 63, Subpart S, NESHAP, Subpart DDDDD, and NSPS Part 60, Subpart A – General Provisions due to EPA promulgated amendments to these subparts for the above referenced facility. Permit No. 1070005-078-AC involved replacing the current ESP used to control particulate matter (PM) emissions from the No. 4 combination boiler with an ESP previously used to control PM emission from the No. 5 Power Boiler. The ESP for the No. 5 Power Boiler was no longer used since the boiler was converted to natural gas firing. The replacement was necessary, because the original ESP (Combination Boiler No. 4) was damaged by fire in November 2012. According to the applicant, the power boiler ESP is nearly identical in size, design and configuration to the original ESP and should provide equivalent PM control efficiency. In addition, Permit No. 1070005-078-AC incorporated a permit exemption letter dated December 12, 2012, wherein the Department granted the permittee the authority to plug off 14 dust collector tubes in the No 4 Combination Boiler dust collection system. After plugging these tubes, 34 active tubes will remain in the dust collection system. The result of plugging the tubes will be an increase in flue gas velocity through the dust collection system (cyclones), which should increase the efficiency of the mechanical dust collection system. This work is also included in this permitting action for completeness even through no permit is required to conduct the work. Air Construction Permit No. 1070005-070-AC authorized the replacement of approximately 1,400 air preheater tubes out of a total of 2,320 tubes in the No. 4 Combination Boiler. Approval has been incorporated into this Title V Air Operation permit.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision 1070005-083-AV received August 15, 2013

Public Notice Published **[03/15/2014]**

EPA 45 day review period began **03/15/2014**, ran concurrently with the Public Notice period, and concludes on **04/29/2014**.

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.

CONCLUSION

This project revises Title V air operation permit No. 1070005-076-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.