DRAFT/PROPOSED Title V Air Operation Permit Revision
Permit No. 1070005-085-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.

Georgia-Pacific Consumer Operations LLC. Palatka Mill 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.

PROJECT DESCRIPTION

The purpose of this permit is to revise Title V air operation permit No. 1070005-083-AV to incorporate the terms and conditions of permit No. 1070005-080-AC.

The No. 4 Recovery Boiler, fires black liquor solids as the primary fuel to facilitate the recovery of the cooking liquor fuel oil was fired as a startup, shutdown and supplemental fuel. Permit No. 1070005-080-AC authorized the removal of the existing oil burners and the installation of new burners and associated equipment to allow the unit to fire natural gas instead of fuel oil during startup, shutdown and supplemental fuel. The conversion of the boiler to natural gas shall not result in any increase in the permitted BLS processing rate of 210,000 lbs/hr. on a 24-hr. average.
PM emissions are controlled by an ESP. TRS, CO, $NO_{x,}$ and SO_2 emissions are monitored via a continuous emissions monitoring system (CEMS). Visible emissions (VE) are monitored with a COMS.

This permit revision also include changes to the minimum differential pressure for the wet scrubber control device on the No. 4 Lime Kiln (EU 017) as requested by the facility in the April 15, 2014 application for permit revision. The No. 4 Lime Kiln recalcines spent lime caked (CaCO3) to produce quicklime (CaO) which is used to convert green liquor to cooking liquor. The No. 4 Lime Kiln has a maximum heat input rate of 130 MMBtu/hr on a 24-hr. average and is fired with natural gas, and residual fuel oil. Particulate matter emissions are controlled with a cyclonic dust collector followed by a wet venturi scrubber. Total Reduced Sulfur (TRS) emissions, scrubber pressure drop (26 inches of water column), and scrubber flow rate are continuously monitored and recorded. The nitrogen oxides emissions (NO_x) are monitored with a continuous emissions monitoring system (CEMS). The EU demonstrated compliance with its scrubber pressure drop (26 inches of water column) in June 25, 2013 and February 18, 2014 compliance tests with a minimum pressure drop of 24 inches of water column

This permit revision also includes updates to No. 4 Combination Boiler (EU 016) Subsection C, Elemental Chlorine (ECF) No. 3 Bleach Plant (EU 036) Subsection K, Thermal Oxidizer with wet scrubber (EU037) Subsection L and Condensate Stripper System (EU 046) Subsection P, due to the September 11, 2012 EPA promulgated Amendments to 40 CFR 63 Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. Updates to the New Brown Stock Washer Lines 3,4,6,&7 (EU 047) Subsection Q and updates to the New Two-stage Oxygen Delignification System (EU 048) Subsection R and Subsection BB due to the September 11, 2012 EPA promulgated Amendments to 40 CFR 63 Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry to subsection BB. Updates to Subpart BB-Standards of Performance for Kraft Pulp Mills April 04, 2014 EPA promulgated Amendments and updated subpart A – General Provisions.

Unregulated and Insignificant Emissions Units and/or Activities:

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received April 15, 2014
Notice of Intent to Issue Air Permit issued **[Month day, year]**
Public Notice Published **[Month day, year]**

EPA 45 day review period began **xx/xx/2013**, ran concurrently with the Public Notice period, and concludes on **xx/xx/2013**.

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 Emissions Units No. 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. 1230001-083-AV, which was issued on April 30, 2014. 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.

Permitting Note: *The Draft/Proposed permit package for Project No. 1070005-085-AV only contains the following documents in order to provide better customer service and enhance the permitting experience:*

1. *Statement of Basis*
2. *Written Notice of Intent to Issue*

3. *Public Notice*
4. *Draft/Proposed permit which includes:*
    - *Cover Page*
    - *Table of Contents*
    - *Placard page*
    - *Section I. Facility Information*
    - *Section II. Facility-Wide Conditions*
    - *Section III. Emissions Units and Specific Conditions. Only emissions units and sections which are being revised are included.*

The FINAL permit will be issued with all emissions units and attachments included.