

## STATEMENT OF BASIS

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Title V Air Operation Permit Revision  
Permit No. 1070005-088-AV

### APPLICANT

The applicant for this project is Georgia-Pacific Consumer Operations LLC. The applicant's responsible official and mailing address are: Mr. Kevin Curry, Interim 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 the Title V Permit to modify Emissions Unit 051- Stationary Internal Combustion Engines by updating and correcting information in the permit, adding three non-emergency engines not currently listed in the permit to the permit, redesignation of Engine No. 8 from emergency to non-emergency, redesignation of Engine No. 5 from new to existing, removal of Engine No. 3 from the permit, and modifying Appendix I to include numerous cooling towers located throughout the facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received January 12, 2015  
Notice of Intent to Issue Air Permit issued February 11, 2015  
Public Notice Published [Month day, year]

EPA 45 day review period began xx/xx/2015, ran concurrently with the Public Notice period, and concludes on xx/xx/2015.

### 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.

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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<sub>2</sub> and TRS, which are controlled by a scrubber.

### APPLICANT REQUESTED REVISIONS

The following is a brief description of the changes that were made as part of this revision:

1. Appendix I is updated to include the following Cooling Towers:
  - [Kraft Machines Cooling Tower](#)
  - [BSW Cooling Tower](#)
  - [NCG/TRS Cooling Tower](#)
  - [Tissue Machines Cooling Tower](#)
  - [Bleach Plant Cooling Tower](#)
  - [Water Plant – East Cooling Tower](#)
  - [Water Plant – West Cooling Tower](#)
  - [Water Plant – Center Cooling Tower](#)
  - [Lime Kiln Cooling Tower](#)
  - [No. 4 Evaporators Cooling Tower](#)
  - [Kraft HVAC Cooling Tower](#)
  - [Korleus Lines Cooling Tower](#)
  - [Pump Shop Cooling Tower](#)
  - [Bucket Shed Cooling Tower](#)
  - [Administration Building Cooling Tower](#)
  - [First Aid Cooling Tower](#)
  - [Chipyard Screen Building Cooling Tower](#)
  
2. Emissions Unit 051- Stationary Internal Combustion Engines is modified to reflect updated and corrected information provided by the facility. Three existing engines have been added to this emissions unit and one engine removed.

Additional changes are listed below by Engine No.:

#### Engine No.

1. Model number, displacement (L/cyl), and HP are corrected.
2. Displacement corrected.
3. Removed – no longer in service; will not run.
4. Displacement corrected, year of install added.
5. Displacement, manufacturer, model no., year of manufacture, and date of installation have been corrected. The engine HP is shown instead of the generator KW. Due to the error in year of manufacture and date installation this unit was previously misclassified as a new source. It is an existing unit.
6. The engine HP is shown instead of generator KW.
7. Year of manufacture and install are corrected.
8. HP corrected.
9. Existing engine, newly listed.
10. Existing engine, newly listed.
11. Existing engine, newly listed.

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### CONCLUSION

This project revises Title V air operation permit No. 1070005-085-AV. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

Permitting Note: *The Draft/Proposed permit package for Project No. 1070005-088-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.*
  - *Appendix I*
  - *Appendix H*

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