Department of
Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Jeb Bush
Governor

Colleen Castille
Secretary

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Revision:

Mr. Theodore D. Kennedy, Vice President
Palatka Operations
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

FINAL Permit Project No.: 1070005-023-AV

Putnam County

Enclosed is the FINAL Permit Revision No. 1070005-023-AV. The purpose is for the revision of the Title V Air Operation Permit. The facility is located in Putnam County. This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:RFS

cc: David A. Buff, P.E.
Barbara Friday, Bureau of Air Regulation (INTERNET E-mail Memorandum)

FINAL Determination

Title V Air Operation Permit Revision
FINAL Permit No.: 1070005-023-AV
Palatka Operations
Georgia-Pacific Corporation

I. Comment(s).

A. No comments were received from the USEPA during their 45-day review period of the PROPOSED Permit.

B. Comments were received from Mr. Edward Jamro, Georgia Pacific Corporation, on March 23, 2004. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Listed below is each comment and a response to each comment in the order that the comment was received.

a. Comment No. 1 -- Page 31 – PM/VE

E.13. Particulate Matter emissions stack testing shall comply with the applicable requirements in Rule 62-297.401(5), F.A.C. (EPA Methods 1 through 5, to determine the mass emissions rate and EPA Method 3A or 3B for oxygen concentration to calculate the corrected particulate matter concentration, incorporated and adopted by reference in Chapter 62-297, F.A.C.). These tests shall be performed once each federal fiscal year. These tests should be conducted concurrently with the Visible Emissions performance test weather permitting.

E.14. Visible Emissions testing shall comply with the applicable requirements in Rule 62-297.401(9), F.A.C. (EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.) and be performed once each federal fiscal year. This test should be conducted concurrently with the PM performance test weather permitting.

GP Comment: – While conducting particulate sampling and Visible Emissions (VE) testing at the same time is a good target, weather conditions during a stack test (which are planned months or weeks in advance and very costly to cancel and to reschedule) may preclude doing the VE test. However, our intent will be to conduct VE and PM tests concurrently if at all possible.

Response: Based on the comments, the Department has added the following permitting note after conditions E.13. and E.14.:

{Permitting note: Pursuant to the procedures of EPA Method 9, the visible emissions compliance test should not be conducted during inclement weather. The facility may postpone the visible emissions compliance test until weather permits. It is also recognized that concurrent EPA Method 5 and Method 9 compliance testing may not be feasible during periods of time of inclement weather}

b. Comment No. 2 -- No. 2 -- Page 32 – SAM

E.20. SAM (Sulfuric Acid Mist) Emissions testing shall comply with Rule 62-297.401(8), F.A.C. (EPA Method 8, incorporated and adopted by reference in Chapter 62-297, F.A.C.) or NCASI Method 8A and be performed once each federal fiscal year.

[Permit #AC54-266676; PSD-FL-226]

GP Comment: NCASI Method 106 does not exist per se. The number 106 was a NCASI bulletin number that described this test method. When finalized and formalized, it became NCASI Method 8A. Therefore NCASI Method 106 should be changed to NCASI Method 8A

Response: Based on the comments and comments from the Emissions Monitoring Section of the Bureau of Air Monitoring and Mobile Sources, the Department has changed condition E.20 to read as follows:

E.20. SAM (Sulfuric Acid Mist) Emissions testing shall comply with Rule 62-297.401(8), F.A.C. (EPA Method 8, incorporated and adopted by reference in Chapter 62-297, F.A.C.) or NCASI Method 106 (8A) and be performed once each federal fiscal year.
[Permit #AC54-266676; PSD-FL-226, Applicant Request dated March 23, 2004]

c. Comment No. 3 – Permitting Notes

D.1. <u>Permitted Capacity.</u> The operation rate shall not exceed 82,986 lb input ($CaCO_3$ & inerts)/hr which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.
{Permitting note: The <u>operating rate</u> limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity…

E.1. <u>Permitted Capacity.</u> The operation rate shall not exceed 210,000 lb (BLS)/hr where BLS is Black Liquor Solids as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. The operation rate of 210,000 lb (BLS)/hr is equivalent to 5.04×10^6 lb/day BLS.

{Permitting note: The <u>operating rate</u> limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity …

G.1. <u>Permitted Capacity.</u> The Tall Oil operating rate shall not exceed 110 tons of crude tall oil per 24-hr period with a yearly maximum of 32,000 tons of crude tall oil.

{Permitting note: The <u>operating rate</u> limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity …

GP Comment: The term "operating rates" is consistent with the term used in the first sentence of each section.

Response: Based on the comments, the Department has changed the permitting note in Conditions D.1., E.1. and G.1. to read as follows:

{Permitting note: The operation rate limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit with the changes noted above.