APPENDIX SC (SPECIFIC CONDITIONS) APPLICABILITY LIST ATTACHMENT			
GEORGIA-PACIFIC CORP. PALATKA PULP & PAPER MILL			
EU DESCRIPTION	DEP EU#	G-P EU#	PAGE
No.4 Power Boiler	14	13	2
No.5 Power Boiler	15	14	3
No.4 Combination Boiler	16	12	4
No.4 Lime Kiln	17	8	5
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Tall Oil Plant	31	10	15
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ClO2 Plant and Methanol Tank	35		20

Identification of Non-Applicable or Obsolete Requirements, Application EU 13 (9/21/99)

Emission Unit Name: No. 4 Power Boiler

Emission Unit Identification: 014

Permit Nos.: A054-196330

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
1	Yes	Maximum heat input rates and test methods	
2	Yes	Perform testing at 90% or greater of permitted rate.	
3	Yes	Maximum allowable operating rate	
4	Yes	Maximum allowable pollutant emission rates	
5	Yes	Test emissions for VE (SS), VE (SB), and SO_2	
6	Yes	Submit maximum input/production rate	
7	Yes	Submit annual operation report	
8	Yes	Submit and approval for any permit revisions	
9	Yes	Identification name and number on all correspondence	
10	**No**	Submit renewal forms 5 months prior and completed form with test results 90 days prior	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, EU 14 (9/21/99)

Emission Unit Name: No. 5 Power Boiler

Emission Unit Identification: 015

Permit Nos.: A054-198182

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
1	Yes	Maximum heat input rates and test methods	
2	Yes	Perform emissions tests	
3	Yes	Maximum allowable operating rate	
4	Yes	Maximum allowable pollutant emission rates	
5	Yes	Test emissions for PM_1, PM_2, SO_2, VE_1, and VE_2,	
6	Yes	Submit maximum input/production rate	
7	Yes	Submit annual operation report	
8	Yes	Submit and approval for any permit revisions	
9	Yes	Identification number on all correspondence	
10	No	Submit renewal forms 5 months prior and completed form with test results 90 days prior	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, EU 12a (9/21/99)

Emission Unit Name: No. 4 Combination Power Boiler

Emission Unit Identification: 016

Permit Nos.: A054-170265

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
1	Yes	Maximum process input rate/capacity	
2	Yes	Perform emission testing	
3	Yes	Maximum operating rate	
4	Yes	Maximum allowable pollutant emission limiting standards/rates	
5	No	Control PM emissions with dust suppressants	**Dust suppressant not necessary, covered by Rule 62-296.320.**
6	Yes	Test pollutant emissions	**Correct footnote to state any approved ASTM method for fuel analysis is acceptable. ASTM methods may change. G-P currently uses ASTM 4294-90.**
7	Yes	Maximum input/production rate	
8	Yes	Monitor and record steam production, pressure and temperature, and No. 6 fuel oil feed	
9	No	Use identification number on all correspondence	**Not necessary**
10	Yes	Submit an annual operation report by March 1	
11	Yes	Submit any permit revision	
12	No	Submit renewed forms	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, Application EU 8 (9/21/99)

Emission Unit Name: No. 4 Lime Kiln

Emission Unit Identification: 017

Permit Nos.: AC 54-192551

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
1	Yes	May continuously operate the No. 4 Lime Kiln	
2	Yes	Maximum process input rate/capacity. Request to delete the maximum product rate	**The value is not measurable.**
3	Yes	Maximum allowable pollutant emission limiting standards/rates	
4	Yes	Total reduced sulfur (hydrogen sulfide) emission limits and test methods	
5	Yes	Sulfur dioxide emission limits and test methods	
6	Yes	Objectionable odors not allowed off plant property	
7	Yes	Visible emission limiting standards is not applicable	
8	Yes	Initial and annual compliance tests for PM/PM_{10}, TRS, H_2So_4 SO_2, NO_x, CO, and VOC	**Reduce testing frequency for SO2, CO and VOC to "upon permit renewal". The historic test data demonstrate the emission limits for these pollutants are being met. Eliminate requirement to test H2SO4 mist annually.**
9	Yes	Comply with all applicable provisions for the No. 4 Lime Kiln	

10	Yes	Comply with all applicable provisions for Continuous Monitoring and Quarterly Reporting Requirements	

Identification of Non-Applicable or Obsolete Requirements, Application EU 8 (9/21/99)

Emission Unit Name: No. 4 Lime Kiln
Emission Unit Identification: 017
Permit Nos.: AC 54-192551

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
11	Yes	Comply with all applicable provisions for Circumvention, excess emissions, and plant operation-problems	
12	Yes	Submit written notification 15 days prior to source testing	
13	No	Submit construction permit extension, if necessary	Obsolete
14	**No**	Submit operation permit application at least 90 days prior to construction permit expiration date	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, EU 8a (9/21/99)

Emission Unit Name: No. 4 Lime Kiln

Emission Unit Identification: 017

Permit Nos.: AO 54-209858

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Maximum operating rate of the lime kiln.	**The reference to product rate should be removed, since this rate is not measurable.**
2	Yes	Test at minimum 90% of maximum rate, or S.C. 3 becomes effective.	
3	Yes	Minimum operating rate during testing.	
4	Yes	Maximum emissions from the No. 4 Lime Kiln	
5	Yes	Test emissions annually.	**Reduce testing frequency for SO2, CO and VOC to "upon permit renewal". The historic test data demonstrate the emission limits for these pollutants are being met.**
6	Yes	Submit continuous TRS monitoring report each calendar quarter.	
7	Yes	Fugitive PM emissions controlled by dust suppressants as necessary unless alternative method is requested and approved.	
8	Yes	VE exception for moisture interference.	
9	Yes	Submit maximum production since time of last test.	
10	Yes	Submit annual operating report.	
11	Yes	Submit any revision to permit prior to implementing.	

12	No	Include ID number and ID name on all correspondence.	**No regulatory implication for not including.**

Identification of Non-Applicable or Obsolete Requirements, EU 8a (9/21/99)

Emission Unit Name: No. 4 Lime Kiln

Emission Unit Identification: 017

Permit Nos.: AO 54-209858

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
13	No	Submit permit renewal forms.	**Already complied with through Title V application.**

Identification of Non-Applicable or Obsolete Requirements, EU 6 (9/21/99)

Emission Unit Name: No. 4 Recovery Boiler

Emission Unit Identification: 018

Permit Nos.: AC 54-192550 (as modified by AC 54-266676; PSD-FL-226)

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
1	Yes	Continuously operate No. 4 Recovery Boiler	
2	Yes	Maximum process input rate/capacity	
3	No	Maximum allowable pollutant emission limiting standards/rates	**Superceded by AC54-266676; PSD-FL-226)**
4	**No**	Total reduced sulfur (hydrogen sulfide) emission limits and test methods	**Superceded by AC54-266676; PSD-FL-226)**
5	Yes	Sulfur dioxide emission limits and test methods	
6	No	Sulfuric acid mist emission limits and test methods	**Superceded by AC54-266676; PSD-FL-226)**
7	Yes	Objectionable odors not allowed off plant property	
8	Yes	Initial and annual compliance tests for PM/PM_{10}, TRS, SO_2, NO_x, CO, VOC, and VE	
9	Yes	Comply with all applicable provisions	
10	Yes	Continuously monitor and complete the Quarterly Reporting Requirements	
11	Yes	Continuously monitor and comply with circumvention, excess emissions, and plant operation-problems	

12	Yes	Submit written notification 15 days prior to source testing	

Identification of Non-Applicable or Obsolete Requirements, EU 6 (9/21/99)

Emission Unit Name: No. 4 Recovery Boiler

Emission Unit Identification: 018

Permit Nos.: AC 54-192550 (as modified by AC 54-266676; PSD-FL-226)

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Rationale**
13	No	Submit construction permit extension, if necessary	Obsolete
14	**No**	Submit operation permit application at least 90 days prior to construction permit expiration date	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, EU 7 (9/21/99)

Emission Unit Name: No. 4 Smelt Dissolving Tanks (2)

Emission Unit Identification: 019

Permit Nos.: AC 54-193841

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Continuously operate the No. 4 Smelt Dissolving Tanks	
2	Yes	Maximum processing rate/capacity	**The reference to smelt (green liquor solids) in this condition should be removed, since all emissions and rates are based on black liquor solids input to the recovery boiler.**
3	Yes	TRS emission as hydrogen sulfide limits and test methods	
4	Yes	PM/PM_{10} limits and test methods	
5	Yes	Visible emission limiting standards is not applicable due to moisture interference	
6	Yes	No objectionable odors allowed off plant property	
7	Yes	Initial and annual compliance tests for PM/PM_{10} and TRS	
8	Yes	Comply with all applicable provisions for the No. 4 Smelt Dissolving Tanks	
9	Yes	Comply with all applicable provisions for Continuous Monitoring	

		and Quarterly Reporting Requirements	

Identification of Non-Applicable or Obsolete Requirements, EU 7 (9/21/99)

Emission Unit Name: No. 4 Smelt Dissolving Tanks (2)

Emission Unit Identification: 019

Permit Nos.: AC 54-193841

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
10	Yes	Comply with all applicable provisions for Circumvention, excess emissions, and plant operation-problems	
11	Yes	Submit written notifications 15 days prior to source testing	
12	No	Submit construction permit extension, if necessary	**Obsolete, already completed**
13	**No**	Submit operation permit application at least 90 days prior to construction permit expiration date	**Obsolete, already completed**

Identification of Non-Applicable or Obsolete Requirements, Application EU 7a (9/21/99)

Emission Unit Name: No. 4 Smelt Dissolving Tanks (2)
Emission Unit Identification: 019
Permit Nos.: AO 54-209650

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Maximum operating rate of smelt dissolving tank	**The reference to smelt (green liquor solids) in this condition should be removed, since all emissions and rates are based on black liquor solids input to the recovery boiler.**
2	Yes	Test at minimum 90% of maximum rate, or S.C. 3 becomes effective.	
3	Yes	Minimum operating rate during testing.	
4	Yes	Maximum emissions from the No. 4 Smelt Dissolving Tank	
5	Yes	Test emissions annually.	
6	Yes	Submit maximum production since time of last test.	
7	No	Does not apply to smelt dissolving tank.	
8	Yes	Monitoring of surrogate parameter of weak wash flow.	
9	Yes	VE exception for moisture interference.	
10	Yes	Submit annual operating report.	

Identification of Non-Applicable or Obsolete Requirements, Application EU 7a (9/21/99)

Emission Unit Name: No. 4 Smelt Dissolving Tanks (2)

Emission Unit Identification: 019

Permit Nos.: AO 54-209650

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
11	Yes	Submit any revision to permit prior to implementing.	
12	No	Include ID number and ID name on all correspondence.	**No regulatory implication for not including.**
13	No	Submit permit renewal forms.	**Already complied with through Title V application.**

Identification of Non-Applicable or Obsolete Requirements, EU 10 (9/18/01)

Emission Unit Name: Tall Oil Plant

Emission Unit Identification: 031

Permit Nos.: AC 54-108945 (as Modified by Permit No. 1070005-009-AC)

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Operating hours are 8,760 hr/yr	
2	No	Crude oil production limits and test methods.	**Superceded by Permit No. 1070005-009-AC**
3	No	Maximum TRS emission limits and test methods	**Superceded by Permit No. 1070005-009-AC**
4	Yes	Comply with all applicable provisions for Continuous Monitoring and Quarterly Reporting Requirements	
5	Yes	Comply with all applicable provisions for Circumvention	
6	Yes	Objectionable odors not allowed off plant property	
7	Yes	Compliance testing to verify TRS emissions	
8	Yes	Submit an annual operating report by March 31	
9	No	Submit operation permit application at least 60 days prior to construction permit expiration date	**Obsolete**
10	No	Scrubber liquor outlet flow rate greater than 149 gpm, monitoring required	**Revision issued 6/16/97**

Identification of Non-Applicable or Obsolete Requirements, EU10a (9/21/99)

Emission Unit Name: Tall Oil Plant

Emission Unit Identification: 031

Permit Nos.: AO 54-209098

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Maximum operating rate of the tall oil plant.	**Correct production rate to allow 110 tons crude tall oil per 24-hour period. Production is measured on a daily basis.**
2	Yes	Test at minimum 90% of maximum rate, or S.C. 3 becomes effective.	
3	Yes	Minimum operating rate during testing.	
4	Yes	Maximum emissions from the Tall Oil Plant.	
5	Yes	Test emissions once every 5 years.	
6	Yes	Submit maximum production since time of last test.	
7	Yes	Maintain scrubber liquor outlet flow rate at 149 gpm or greater, and monitor.	**G-P is submitting a revision to this condition.**
8	Yes	Submit TRS surrogate parameter report each calendar quarter.	
9	Yes	Submit annual operating report.	
10	Yes	Submit any revision to permit prior to implementing.	
11	No	Include ID number and ID name on all correspondence.	**No regulatory implication for not including.**

12	No	Submit permit renewal forms.	**Already complied with through Title V application.**

Identification of Non-Applicable or Obsolete Requirements, EU 10 (9/18/01)

Emission Unit Name: Tall Oil Plant
Emission Unit Identification: 031
Permit Nos.: 1070005-009-AC

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	ID and Project Name	
2	Yes	Crude oil production limits	
3	Yes	Hours of operation	
4	Yes	Maximum TRS emission Limits and test methods	
5	Yes	TRS emission compliance testing, frequency of testing, type of cook during testing	
6	Yes	Continuous Monitoring device, surrogates	
7	Yes	Revisions to application	
8	No	Application for Title V Permit Revision submitted no later than 180 days after EU commences operation under terms of this AC permit	**Obsolete**

Identification of Non-Applicable or Obsolete Requirements, EU 5 (9/21/99)

Emission Unit Name: NCG Collection/TRS Incinerator (Including Digester System, Multiple Effect Evaporator System, and Condensate Stripper System)

Emission Unit Identification: 032

Permit Nos.: AC54-142282, AC54-142283, AC54-142288, and AC54-142291 (All as Modified by AC54-266676; PSD-FL-226)

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	Sources are permitted to operate continuously	
2	Yes	Collect emissions from digesters, MEEs, and stripper and incinerate	
3	Yes	TRS emission limits and test methods	
4	Yes	Particulate emission limits and test methods	
5	Yes	SO_2 emission limits and test methods	
6a	Yes	Maximum operating rates of the digester system; continuously monitor and record operation rates	**No longer required per AC54-266676; PSD-FL-226.**
6b	Yes	Maximum operating rates of the multiple effect evaporator system.	**Revise the nominal input rate to the pre-evaporator stage of evaporation to equal the throughput at the concentrator outlet (259, 121 lbs of dry BLS/hr). Based on conservation of mass, these must be equal. Also, the operating rate of the MEE's should be recorded once per hour, since**

			the measurement is by integrator reading.
6c	Yes	Maximum operating rate of the condensate stripper system.	**The input rates in lb/hr should be deleted, since the flow is measured in gal/min.**
7	No	TRS incinerator maximum operating rates; continuously monitor and record hourly operation rates	**G-P requests that natural gas usage be recorded once per day rather than hourly. Hourly recording is burdensome and unnecessary.**
8	Yes	Minimum temperature and residence time; install device to continuously monitor and record combustion temperature at the incineration point	
9	Yes	Report and evaluate excess emissions of TRS from incinerator	
10	Yes	Requires contingency plan	
11	Yes	Regularly calibrate and maintain all continuous monitoring and recording systems	
12	Yes	Conduct all compliance testing at 90 to 100 percent of maximum rate	
13	Yes	Conduct annual compliance tests: SO2 and VE tests required annually. PM/PM10 tests required every 5 years. No TRS or SAM testing required any longer.	**This condition was revised by Specific Condition 7 of AC54-266676; PSD-FL-226**
14	No	Test to determine NSPS applicability of MEE system	**NSPS not triggered; operating permit no. AO54-166018 issued 1/22/91 limits for future permits and PSD determinations.**
15	Yes	Construct, operate, and maintain systems	
16	No	Mass emissions of pollutants for future permits and PSD determinations	Not emission limits
17	**No**	Submit appropriate fees, test results, and other data	Obsolete - already completed

Identification of Non-Applicable or Obsolete Requirements, (9/18/01)

Emission Unit Name: Chlorine Dioxide Plant with Methanol Storage Tank

Emission Unit Identification: 035

Permit No.: 1070005-005-AC

Specific Condition	**Applicable Requirement**	**Brief Description of the Applicable Requirement or Reason that it is not Applicable**	**Change/Rationale**
1	Yes	ID Number and Project Number	
2	Yes	ClO2 Maximum Production Rate	
3	Yes	Hours of Opeation	
4	Yes	Recordkeeping Requirements for 40 CFR 60 Subpart Kb	
5	Yes	Objectionable Odor	
6	Yes	Annual Operating Report Submittal Requirements	
7	Yes	Revisions to the Application	
8	**No**	Application for Title V Permit Revision submittal no later than 180 days after EU commences operation under terms of this AC permit.	**Obsolete**