Title V Air Operation Permit Renewal
Permit No. 1070005-068-AV

APPLICANT

The applicant for this project is Georgia-Pacific Consumer Operations LLC. The applicant's responsible official and mailing address are: 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 permitting project is to revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued December 24, 2006
Notice of Intent to Issue Air Permit issued April 2, 2012
Public Notice Published **[Month day, year]**

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.

PROJECT REVIEW

Following is a brief description of the changes that were made as part of this renewal (replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.). Numerically listed is a discussion of the reasons for the changes being made as part of this project, followed by the conditions(s) being changed. The changes in the condition are with a ~~strikethrough format~~ for deletions and a double underline format for additions.

1. Add 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: **Industrial, Commerical, and Institutional Boilers and Process Heaters for EUs 015, 016 & 044**

On September 13, 2004, EPA promulgated national emission standards for hazardous air pollutants (NESHAP) for industrial, commercial, and institutional boilers and process heaters.

On June 19, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the standards.

On March 21, 2011, EPA promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This final rule became effective on May 20, 2011.

On May 18, 2011, EPA published a notice delaying the effective dates of the March 21, 2011 final rule until such time as judicial review is no longer pending or until EPA completes its reconsideration of the rules, whichever is earlier.

On December 23, 2011, EPA published the reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters). The EPA intends to finalize the reconsideration in the spring of 2012.

On January 9, 2012, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating and remanding the EPA May 18, 2011delay notice. As such, the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters is now effective.

2. Correction to Specific Condition(s) B.1 and B.4.:

EU015 No. 5 Power Boiler. The emissions in the permit where still based on firing #6 fuel oil and not the natural gas firing. **Specific Condition B.1 and B.4** has been corrected:

B.1. Permitted Capacity. The maximum heat input rate is 540 ~~568.9~~ MMBtu of heat input per hour based on a 24-hour average. At this heat input rate, the unit will produce approximately 420,000 lb/hour of steam based on a 24-hour average.

B.4. NO_X and CO pollutant emissions are as followed.

Pollutant	Standard Heat Input	Lb/hour	Basis
NO_X	0.125 lb/MMBtu	~~71.1~~ 67.5	Based on an average of three test runs NOTE (1)
CO	0.185 lb/MMBtu	~~105. 2~~ 99.9	Based on an average of three test runs NOTE (2) and (3)

NOTE (1): NO_X testing shall comply with the applicable requirements in Rule 62-4.070(3), F.A.C. and 62-212.400(12), F.A.C., (EPA Method 7E, 40 CFR 60, Appendix A, incorporated and adopted by reference in Chapter 62-297, F.A.C.) and be performed once each federal fiscal year per Rule 62-297.310(7)(a)4., F.A.C.
NOTE (2): CO testing shall comply with the applicable requirements in Rule 62-212.400(BACT), F.A.C., EPA Method 10.
NOTE (3): The CO standard serves as a surrogate standard for minimizing VOC emissions as a result of the efficient combustion of natural gas.

CO and NO_X: The Department may require the permittee to repeat some or all of the initial stack tests after major replacement or major repair of emissions-related equipment. [Rules 62-4.070(3), 62-212.400(PSD) and 62-297.310(7), F.A.C.]

{Permitting Note: VOC emissions are expected to be less than 14 tons per year from firing natural gas.}

[Rule 62-212.400 (BACT), F.A.C.; Construction Permit No. 1070005-038-AC and Construction Permit No. 1070005-036-AC]

3. Correction to Specific Condition(s) D.2.:

D.2. Authorized Fuels. The No. 4 Lime Kiln is authorized to fire residual fuel oil with a maximum fuel sulfur content of 2.35% by weight as the primary fuel. On-specification used oil meeting the requirements in Subsection S of this permit may be blended with the residual oil and fired at a rate of no more than 10% of the fuel consumed. Natural gas is authorized as a startup and alternate fuel. The maximum heat input rate is 140 MMBtu per hour when firing a maximum of 933 gallons per hour of residual oil with a heating value of 150,000 Btu per gallon. No more than 8,173,000 gallons of oil shall be fired during any consecutive 12 months.

[Construction Permit No. 1070005-038-AC; Rule 62-210.200 (PTE), F.A.C., and Construction Permit No. 1070005-017-AC]

D.2. continued:

~~Excess Emissions due to startup and shutdown are conditionally allowed for up to 8 hours in any 24-hour period unless specifically authorized by the Department for longer duration.~~

~~{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}~~
~~[Rule 62-213.410, F.A.C.; Construction Permit No. 1070005-017-AC; PCP Exclusion dated March 14, 2002]~~

4. Requested change to Batch Pre-Scrubber and Continuous Pre-Scrubber minimum flow rate based on recent testing:

N.18. **Batch Pre-Scrubber.** The Batch Pre-Scrubber shall be equipped with devices to continuously monitor the scrubber liquid flow rate. The minimum flow rate shall be 85~~99~~ gallons per minute.
[Renewal Title V Application dated May 13, 2011]

{Permitting Note: The averaging time for this condition is based on the specified averaging time of the applicable test method, i.e. a 3-hour block average. Monitoring frequency shall be every 15 minutes.}
[November 26, 2002 Performance Testing Results]

N.19. **Continuous Pre-Scrubber.** The Continuous Pre-Scrubber shall be equipped with devices to continuously monitor the scrubber liquid flow rate. The minimum flow rate shall be 85~~99~~ gallons per minute.
[Renewal Title V Application dated May 13, 2011]

{Permitting Note: The averaging time for this condition is based on the specified averaging time of the applicable test method, i.e. a 3-hour block average. Monitoring frequency shall be every 15 minutes.}
[November 26, 2002 Performance Testing Results and November 4, 2010 Performance Testing Results]

5. Added Subsection CC for the Emergency Engines: EU051

The Mill operates a number of diesel-fired, propane-fired, and natural-gas fired stationary engines used primarily as emergency-use only engines as back-up power sources for several pieces of process equipment, including the No. 4 Recovery Boiler and the No. 4 Lime Kiln. The Mill also uses a number of engines to supply power to fire-water protection pumps.

Engine No.	Description	Displacement liters/cylinder (l/c)	Manufact.	Fuel Fired	HP or KW Rating	Year Built	**Model No.**	**Serial #**
1	Little Fire Water Pump Backup Fire Water Pump (located Rice creek Pump House inside front door)		Detroit	Diesel	130 HP	Purchased 1965 Installed 1968	TTA11162	378838
2	Fire Water Pump Backup Fire Water Pump (located Rice creek Pump House westside of little fire water pump)	1.2	Cummins	Diesel	175 HP	Installed 2010	CFP7E-F10	73072 733
3	Power House- Emergency Lights (Ground floor south wall by PB3 equipment room)	xx	Onan	Diesel	21.8 BHP 12 KW	Purchased 1980	120DJC-3CR	H79044 3412
4	Power House- Emergency Lights (located 2nd floor south wall, east corner)	2.1	Yamaha	Gasoline	2.0 KW	Purchased 1988	EF-2000	
5	No. 4 RB Generator Backup Generator for DCS & ESP valves (located Outside south wall)	1.0	Katolight	Natural Gas	80 KW	Purchased 2008	SP Series	
6	No. 4 RB precipitator generator Backup generator for lights (located Under precipitator southwest corner)	2.3	Allis Chalmers	Diesel	200 KW	Purchased 1983	25000 MARK11	2505 365
7	Old Turbine room generator backup for generator lights (located Ground floor, east wall by door)	0.74	MWM Deutz Corp	Diesel	10 KW 19 HP	SPEC 01.3022.02 4/01	D302-2	302-239766
8	Lime Kiln backup to Rotate Kiln (located Lime Kiln Pier 3)	0.63	Wisconsin Engine	LPG	30 HP	Installed 2009	VG4D2	8110 001

These emissions units a regulated under 40 CFR 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines; 40 CFR 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines,40 CFR 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR 63, Subpart A- General Provisions.

6. Updated Appendix I and U to reflect the changes from permit No. 1070005-041-AC:

Appendix I

Brief Description of Emissions Units and/or Activities

1. Humidity Control System at the No. 4 Tissue Paper Machine
2. Dregs Filter ~~Dust Control System at the No. 4 Tissue Paper Machine~~
3. ~~Dust control system and scrubber vent from the No. 3 Tissue Paper Machine.~~
4. ~~Dregs Filter~~
5.

Appendix U

E.U. ID No.	Brief Description of Emissions Units and/or Activity
038	Facility Wide Fugitive Emissions
039	Chipyard
040	Brownstock Washing *(will become regulated on April 17, 2006 due to 8-year MACT I)*
041	Pulping Area General *(only those units not subject to the 3-year and 8-year MACT I standards)*
042	Chemical Recovery Area *(except those units covered by MACT II)*
043	Drying/ Warehouse; Tissue Paper Machine No.(s) 3, 4, and 5
049	Chip Mill

CONCLUSION

This project renews Title V air operation permit No. 1070005-031-AV, which was issued on December 24, 2006. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.