TECHNICAL EVALUATION

APPLICANT

Georgia-Pacific Consumer Operations LLC
Consumer Products Division
Palatka Pulp and Paper Operations
P.O. Box 919
Palatka, Florida 32178-0919

Georgia-Pacific Palatka Mill
Facility ID No. 1070005

PROJECT

Project No. 1070005-075-AC
Exemption from Requirement to Obtain an Air Construction Permit
Replacement of Primary Condenser in Turpentine Recovery System (Project)

COUNTY

Putnam County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

September 2012

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

This facility is an existing Kraft pulp and paper mill categorized under Standard Industrial Classification Nos. 2611, 2621.

This existing Kraft pulp and paper mill consists of major activities such as: chip handling, pulping, bleaching, chemical recovery, utilities, paper machines, converting, turpentine and tall oil production.

The existing Palatka Mill is located in Putnam County at 215 CR 216, Palatka, Florida 32177. UTM Coordinates are: Zone 17, 434.0- km East and 3283.4 km North; Latitude: 29°40’00” North and Longitude: 81°40’45” West.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

On August 30, 2012, the applicant submitted a request for a case-by-case permitting exemption from an air construction (AC) permit for the replacement of the primary condenser in the turpentine recovery system at the Georgia-Pacific (GP) Palatka Mill (project) under Rule 62-4.040(1)(b), F.A.C.

The turpentine recovery system operates under the current valid Title V air operation permit, Permit No. 1070005-068-AV, effective July 9, 2012. The primary condenser in the turpentine recovery system vents to the thermal oxidizer (Emissions Unit Identification Number (E.U. ID No.) 037).

The permittee claims the primary condenser is leaking cooling water through the shell of the vessel due to stress cracks and corrosion. The permittee claims replacing the primary condenser with a like in-kind unit will help the facility avoid a failure of the unit.

Application (Request) Processing Schedule

Request for Exemption from an AC Permit dated August 30, 2012 and received on September 6, 2012 (complete "application").

Complete details of the proposed project were provided in the letter dated August 30, 2012, from GP which is accessible via the Department's world wide web site at http://appprod.dep.state.fl.us/air/emission/apds/default.asp by entering the project number shown above.

Relevant Documents

- Permit No. 1070005-068-AV, Current Title V Air Operation Permit.

2. DEPARTMENT REVIEW

Replacing the primary condenser in the turpentine recovery system is a physical change.

The Georgia-Pacific Palatka Mill is an existing prevention of significant deterioration (PSD) major source of air pollution. An evaluation of emissions was necessary to determine whether or not the change was a "major modification" (defined in Rule 62-210.200(191), F.A.C.) under Rule 62-212.400(2)(a), F.A.C. The permittee submitted a PSD analysis as required under Rule 62-212.400(2)(a)1., F.A.C., comparing the baseline actual emissions to the projected actual emissions (test). There was no proposed increase in pulp production; the primary condenser will be replaced with the same design capacity. The emission calculations performed by the permittee show no increase in emissions from the proposed physical change. The Department accepts the permittee's PSD analysis, showing no increase in emissions.

3. DETERMINATION

Pursuant to Rule 62-4.040(1)(b) , F.A.C. and for the reasons stated in this Technical Evaluation, the Office of Permitting and Compliance hereby determines that the proposed activity (project) will not emit air pollutants "*... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified.*" Therefore, the project is exempt from the requirement to obtain an AC permit.

This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

Mr. Scott M. Sheplak, P.E. is the project engineer responsible for reviewing the request and drafting the exemption. Additional details of this analysis may be obtained by contacting him by telephone at 850/717-9074 or by e-mail at scott.sheplak@dep.state.fl.us in the Department's Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.