FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

March 28, 2013

Mr. Gary L. Frost, Vice President of Consumer Operations
Georgia-Pacific Consumer Operations LLC
PO Box 919
Palatka, Florida 32178

Re: Draft Air Construction Permit No.: **1070005-079-AC**
DRAFT/PROPOSED Title V Air Operation Permit Revision Project No.: **1070005-076-AV**
Revision to Title V Air Operation Permit No.: **1070005-068-AV**
Palatka Mill

Dear Mr. Frost:

The above referenced Draft Air Construction Permit and DRAFT/PROPOSED Title V Air Operation Permit Revision issued on January 25, 2013 are withdrawn. Enclosed is the modified draft/proposed permit package and the modified draft air construction permit package for the Palatka Mill site. This facility is located at 215 County Road 216 in Putnam County, Palatka, FL. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, and the primary rule applicability, and the changes since the last Title V renewal.
- The Technical Evaluation and Preliminary Determination, which summarizes the the draft/proposed Title V air operation permit revision and the draft air construction permit, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft/proposed permit and the air construction permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because these permits are being processed as a combined draft/proposed permit and a draft air construction permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the the following address: oquendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Jerry Woosley, by telephone at 904-256-1563 or by email at jerry.woosley@dep.state.fl.us.

Sincerely,

Khalid AlNahdy

Khalid AlNahdy, P.E., MBA
Program Administrator
Waste & Air Resource Management

Enclosures

KAA/jw

In the Matter of an
Application for Permits by:

Georgia-Pacific Consumer Operations LLC Draft Air Construction Permit No.: 1070005-079-AC
P. O. Box 919 DRAFT/PROPOSED Title V Air Operation Permit Revision No.: 1070005-076-AV
Palatka, Florida 32178-0919 Palatka Mill
Putnam County

Facility Location: The applicant (Georgia-Pacific Consumer Operations LLC) operates the Palatka Mill located at Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida.

Project: The applicant applied on November 5, 2012 for a Title V Air Operation Permit Revision. This is a revision of Title V Air Operation Permit No. 1070005-068-AV. 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. The purpose of Title V Air Operation Permit Revision No.: 1070005-076-AV is to revise the Title V Air Operation Permit No. 1070005-068-AV to incorporate the terms and conditions of Permit No. 1070005-072-AC and to make minor changes to the No. 4 Recovery Boiler fuel oil burner descriptions, deletion of the steam capacity comments for the No. 4 Recovery Boiler, and to delete references to the burning of ultra low sulfur distillate fuel oil in the No. 4 Recovery boiler since the equipment utilized to burn ULSD fuel oil has been removed.

On December 21, 2012 the applicant clarified that the original application(received November 5, 2012) was also for an air construction permit [No.: 1070005-079-AC (to be concurrently processed)] to modify certain terms and conditions of air construction permit No.: 1070005-050-AC regarding fuel oil burner capacities (as installed) and the steam capacity description. The original Intent to Issue Permit was issued on January 25, 2013. Comments were received from the applicant and the permits were modifed; therefore those documents are withdrawn effective the issue date of the modified Intent to Issue Permit the draft/proposed Title V air operation permit revision and a draft air construction permit.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, and 62-210 of the F.A.C..The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility and an air construction permit is required to modify the facility. The Department of Environmental Protection's Air Resource Section in the Northeast District Office is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904-256-1700 and the FAX number is 904-256-1590.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the draft air construction permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permit and the draft air construction permit by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above.

Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit revision and a draft air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing/modified equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final (Title V) permit in accordance with the conditions of the draft/proposed permit and a final air construction permit in accordance with the conditions of the draft air construction permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The permitting authority will accept written comments concerning the Draft Air Construction Permit for a period of 14 (fourteen) days from the date of publication of this Public Notice. Written comments should be provided to the Florida Department of Environmental Protection, Northeast District Office, Air Resource Management, at 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, or by facsimile at (904) 256-1590. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The Permitting Authority will accept written comments concerning the DRAFT/PROPOSED Title V Air Operation Permit Revision for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at Florida Department of Environmental Protection, Northeast District Office, Air Resource Management, at 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, or by facsimile at (904) 256-1590. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action.

If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (http://faw.dos.state.fl.us/) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT/PROPOSED Title V Air Operation Permit Revision, the Permitting Authority shall issue a Revised DRAFT/PROPOSED Title V Air Operation Permit Revision and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14

(fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing.

The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address:

oquendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, SW, Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm.

Sincerely,

Khalid AlNahdy

Khalid AlNahdy, P.E., MBA
Program Administrator
Waste & Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION (including the combined PUBLIC NOTICE, the Draft Air Construction Permit and the DRAFT/PROPOSED Title V Air Operation Permit package), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on March 28, 2013 to the persons listed below:

Mr. Phillip D. Cobb, P.E., Golder Associates Inc.: (pcobb@golder.com)
Ms. Barbara Friday, DEP BAR: Barbara.Friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC (ron.reynolds@gapac.com)
Mr. Gary L. Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

_____ March 28, 2013
Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

Florida Department of Environmental Protection
Northeast District Office
Air Resource Management
Draft Air Construction Permit No.: 1070005-079-AC
DRAFT/PROPOSED Title V Air Operation Permit Revision Project No.: 1070005-076-AV
Revision to Title V Air Operation Permit No.: 1070005-068-AV
Georgia-Pacific Consumer Operations LLC
Putnam County

Applicant: The applicant for these projects is Georgia-Pacific Consumer Operations LLC. The applicant's name and address are: Mr. Gary L. Frost, Vice President Operations, Georgia-Pacific Consumer Operations LLC, PO Box 919, Palatka, Florida 32178.

Facility Location: The applicant (Georgia-Pacific Consumer Operations LLC) operates the Palatka Mill located at Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida.

Project: The applicant applied on November 5, 2012 for a Title V Air Operation Permit Revision. This is a revision of Title V Air Operation Permit No. 1070005-068-AV. 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. The purpose of Title V Air Operation Permit Revision No.: 1070005-076-AV is to revise the Title V Air Operation Permit No. 1070005-068-AV to incorporate the terms and conditions of Permit No. 1070005-072-AC and to make minor changes to the No. 4 Recovery Boiler fuel oil burner descriptions, deletion of the steam capacity comments for the No. 4 Recovery Boiler, and to delete references to the burning of ultra low sulfur distillate fuel oil in the No. 4 Recovery boiler since the equipment utilized to burn ULSD fuel oil has been removed.

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A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: oquendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, SW, Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm.