Final Title V Air Operation Permit Revision
Permit No. 1070005-086-AV

APPLICANT

The applicant for this project is Georgia-Pacific Consumer Operations LLC. The applicant's responsible official and mailing address are: Mr. Kevin Curry, Interim 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.

Georgia-Pacific Consumer Operations LLC. Palatka Mill 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.

PROJECT DESCRIPTION

The purpose of this permit is to revise Title V air operation permit No. 1070005-083-AV to incorporate the terms and conditions of Permit No. 1070005-081-AC, which authorized the removal of the existing baghouse and the installation of new drum filtering system that will control particulate matter emissions from 12 converting lines in the Converting Department

Unregulated and Insignificant Emissions Units and/or Activities:

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received June 10, 2014
Notice of Intent to Issue Air Permit issued June 17, 2014
Comment on Draft/Proposed permit received July 16, 2014
Reissuance of Notice of Intent to Issue Air Permit on July 25, 2014
Public Notice Published August 5, 2014

EPA 45 day review period began 8/5/2014, ran concurrently with the Public Notice period, and concludes on 9/19/2014.

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 Emissions Units No. 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.

COMMENTS FROM APPLICANT

On July 16, 2014, a comment from the applicant were received concerning the draft/proposed permit prior to publication of the Public Notice. Based on this comment, the following change was made to the draft/proposed Title V Permit Revision:

The following statement in the emissions unit 050 description (page 10, paragraph 4) should be revised from:

The clean exhaust air from the drum filter system is returned to the Converting Building approximately 50% of the time during the year (mainly winter months) and to the atmosphere during the summer months.

…to …..

The clean exhaust air from the drum filtering system can be returned to the Converting Building, typically during the winter months.

Reason: Emissions presented in the application are based on worst case, venting to atmosphere the entire year. Venting back into the building is an option. As written, it may be construed as a requirement to return the exhaust 50% of the time.

Response: The 4th paragraph in the emissions unit description for Emissions Unit No. 050 is revised as requested:

The clean exhaust air from the drum filtering system ~~is~~ can be returned to the Converting Building, ~~approximately 50% of the time~~ typically during the ~~year (mainly~~ winter months~~) and to the atmosphere during the summer months~~. Small quantities of fugitive VOC emissions are generated from the converting lines with the application of core glue and adhesives.

CONCLUSION

This project revises Title V air operation permit No. 1230001-083-AV, which was issued on April 30, 2014. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

Permitting Note: *The Draft/Proposed permit package for Project No. 1070005-085-AV only contains the following documents in order to provide better customer service and enhance the permitting experience:*

1. *Statement of Basis*

2. *Written Notice of Intent to Issue*
3. *Public Notice*
4. *Draft/Proposed permit which includes:*
    - *Cover Page*
    - *Table of Contents*
    - *Placard page*
    - *Section I. Facility Information*
    - *Section II. Facility-Wide Conditions*
    - *Section III. Emissions Units and Specific Conditions. Only emissions units and sections which are being revised are included.*

The FINAL permit will be issued with all emissions units and attachments included.