REVISED PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Bureau of Air Regulation
Project No. 1070005-045-AC, Revised Draft Air Permit No. PSD-FL-393
Georgia-Pacific Consumer Operations LLC – Palatka Mill
Putnam County, Florida

Applicant: The applicant for this project is the Georgia-Pacific Consumer Operations LLC. The applicant's authorized representative and mailing address is: Mr. Keith Wahoske, Vice President of Palatka Operations, Georgia-Pacific Consumer Operations LLC, P.O. Box 919, Palatka, Florida 32178-0919.

Facility Location: Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

Project: The applicant proposes to modify the No. 4 Combination Boiler in two phases. The initial phase includes the following changes: upgrades to the bark/wood delivery system with new air swept bark conveyors and feed bin to increase bark/wood firing rate; increase the maximum hourly heat input rate; installation of a new overfire air (OFA) system; installation of a new mechanical collector to replace the existing multiclone pre-cleaner; installation of a bottom ash handling system; modification of ductwork to use the existing multiclone/electrostatic precipitator (ESP)/stack from the No. 5 Power Boiler (which has been converted to natural gas) to serve the No. 4 Combination Boiler in parallel with the existing multiclone/ESP/stack; and modification of ductwork to introduce the dilute non-condensible gases into the new OFA system. The second phase will convert the supplemental residual oil firing system for the No. 4 Combination Boiler to natural gas and permanently discontinue use of residual oil. Implementing this phase is dependent on obtaining additional pipeline capacity from the natural gas vendor, the Florida Gas Transmission Company, which may take approximately 2 to 3 years depending on the siting process for new pipelines as well as construction.

On May 9, 2008, the Department issued a Draft Permit package. The permittee published the Public Notice on May 24, 2008, and subsequently submitted timely comments. The comments were substantial such that the Department rescinded the original Draft Permit package and revised certain conditions of the Draft Permit package. The Department is now issuing a Revised Draft Permit package for which comments are being accepted.

Potential emissions from the No. 4 Combination Boiler may increase by the following amounts: 455 tons/year of carbon monoxide (CO), 180 tons/year of nitrogen oxides (NO_X), 1 ton/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}), and 20 tons/year of volatile organic compounds (VOC). Conversion from supplemental residual fuel oil to natural gas will result in a potential reduction of more than 3800 tons/year of sulfur dioxide and 163 tons per year of sulfuric acid mist. Based on a netting analysis including other contemporaneous projects, this project is subject to preconstruction review for the prevention of significant deterioration (PSD) of air quality for emissions of CO, NO_X, PM_{10} and VOC in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.).

The Revised Draft Permit establishes emissions standards for these pollutants based on the Best Available Control Technologies (BACT) as determined by the Department. Particulate matter emissions will be controlled with new mechanical collectors and an improved ESP system. Emissions of CO, NO_X and VOC will be controlled by improving overall combustion and staging combustion with the upgraded OFA system. Low-NO_X burners will be installed to further reduce NO_X emissions when firing natural gas. Continuous emissions monitors are required for CO and NO_X to demonstrate compliance, which will also provide feedback to the control system and operators. If unable to achieve the new NO_X BACT standard with the new OFA system alone, the permit requires installation of additional NO_X control equipment, such as selective non-catalytic reduction.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PSD Class II increments of nitrogen dioxide (NO_2) and PM_{10} consumed by all sources in the area, including this project, are summarized in the following table.

PSD Class II Increment Analysis

Pollutant	Consumed ($\mu g/m^3$)	Allowable ($\mu g/m^3$)	Percent Consumed
PM_{10}			
24-hour average	22	30	73
Annual average	0	17	0
NO_2			
Annual average	3	25	12

Emissions of NO_2 and PM_{10} from the project have no significant impact on any of the affected PSD Class I areas (Okefenokee, Chassahowitzka and Wolf Island National Wilderness Areas).

(Public Notice to be Published in the Newspaper)

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

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 Revised Draft Permit, the Revised Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Revised Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this revised notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Revised Draft Permit and requests for a public meeting for a period of 30 days from the date of publication of the Revised Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. In addition, if a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to the Revised Draft Permit, the Permitting Authority shall revise the Revised Draft Permit 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, F.S. The petition must contain the information set forth below and must be filed with (received by) 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 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Revised Public Notice or receipt of a written notice, 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 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, 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; the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Revised Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

(Public Notice to be Published in the Newspaper)