NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit:

Mr. Theodore D. Kennedy Vice President – Palatka Operations Georgia-Pacific Corporation Palatka Mill P.O. Box 919 Palatka, Florida 32178-0919 DEP File No.: 1070005-028-AC/PSD-FL-341

Putnam County

Enclosed is the Final Air Construction Permit/PSD Permit, Nos. 1070005-028-AC/PSD-FL-341. The AC is being issued to allow the construction of a new Bark Hog, which replaces the existing one; to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units. The facility is located at North of CR 216 and West of US 17, Palatka, Putnam County. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.). Comments were received during the Public Notice period.

Any party to this order (permit) has the right to seek judicial review of the permit (letter) pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer

Chief

Bureau of Air Regulation

Zun L Vilhayn

CERTIFICATE OF SERVICE

Mr. Theodore D. Kennedy *, Vice President - Palatka Operations, Georgia-Pacific Corporation, Palatka Mill

Ms. Myra Carpenter, G-PC

Mr. David Buff, P.E., GAI

Mr. Chris Kirts, NED Office

Mr. Gregg Worley, EPA Region 4

Mr. John Bunyak, NPS

Clerk Stamp

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

'l (Dai

Final Determination

Georgia-Pacific Corporation
Palatka Operations

Putnam County

Air Construction Permit Project No.: 1070005-028-AC/PSD-FL-341

I. Public Notice.

An "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" to Georgia-Pacific Corporation's Palatka Mill located North of CR 216 and West of US 17, Palatka, Putnam County, Florida, was distributed on November 24, 2004. The Public Notice of Intent to Issue an Air Construction Permit was published in the Palatka Daily News on November 27, 2004. The DRAFT Permit was available for public inspection at the Department's Northeast District office and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" was received on December 3, 2004.

II. Public Comments.

Comments were received and the Draft AC was changed. The comments were not considered significant enough to reissue the Draft AC and require another Public Notice. Comments were received from one respondent [Ms. Myra Carpenter with Georgia-Pacific Corporation (G-PC)] during the 30 (thirty) day public comment period on December 27, 2004. Referenced below is the comment document received and the responses to the comments.

- A. Letter from Ms. Myra Carpenter, application contact., with G-PC, received December 27, 2004.
- 1 Permit
- a. Specific Condition F.2. The request to include Rule 62-296.320(4)(c)4., F.A.C., is acceptable and the following is changed:

FROM:

F.2. Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter (PM) from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following: a) Paving and maintenance of roads, parking areas and yards; b) application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent PM from becoming airborne; e) landscaping or planting of vegetation; f) use of hoods, fans, filters, and similar equipment to contain, capture and/or vent PM; g) confining abrasive blasting where possible; and, h) enclosure or covering of conveyor systems. [Rules 62-296.320(4)(c)1. & 3., F.A.C.]

TO:

F.2. <u>Unconfined Emissions of Particulate Matter</u>. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter (PM) from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following: a) Paving and maintenance of roads, parking areas and yards; b) application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) removal of PM

Final Determination (cont.) Georgia-Pacific Corporation

Palatka Mill

Permit Project No.: 1070005-028-AC/PSD-FL-341

Bark Hog Project Page 2 of 2

from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent PM from becoming airborne; e) landscaping or planting of vegetation; f) use of hoods, fans, filters, and similar equipment to contain, capture and/or vent PM; g) confining abrasive blasting where possible; and, h) enclosure or covering of conveyor systems. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice. [Rules 62-296.320(4)(c)1., 3. & 4., F.A.C.]

b. Specific Condition F.4. The request to establish when the BMP (Best Management Practices) is to be submitted and finalized is acceptable and the following is edited/changed:

FROM

F.4. Pursuant to the BACT determination, Best Management Practices (BMP) shall be used to minimize VOC emissions from the outside storage of bark and wood chips. Therefore, a BMP Plan to minimize the VOC emissions from the outside storage of bark and wood chips shall be submitted to the NED for approval prior to submission of an application for an operation permit (Title V Revision or Renewal) and shall be finalized and incorporated into the Title V Air Operation Permit.

[Rules 62-4.070(3), 62-212.400(6), BACT, and 62-213.400(1) & (2),F.A.C.]

TO:

F.4. Pursuant to the BACT determination, Best Management Practices (BMP) shall be used to minimize VOC emissions from the outside storage of bark and wood chips. Therefore, a BMP Plan to minimize the VOC emissions from the outside storage of bark and wood chips shall be submitted to the NED for approval as part of the facility's application for an operation permit (Title V Renewal due prior to April 30, 2005) and shall be finalized and incorporated into the Title V Air Operation Permit. [Rules 62-4.070(3), 62-212.400(6), BACT, and 62-213.400(1) & (2),F.A.C.; and, applicant request]

III. Conclusion.

The final action of the Department will be to issue the air construction permit with the changes noted above.



Department of **Environmental Protection**

leb Bush Governor

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

PERMITTEE:

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

1070005

Permit Number:

1070005-028-AC

PSD-FL-341

Date of Issue:

January 5, 2005

Expiration Date: County:

January 31, 2006 Putnam

Project:

New Bark Hog

This permit is issued to allow the construction of a new Bark Hog, which replaces the existing one; to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units. These changes will occur at the existing Georgia-Pacific Corporation's Palatka Mill located North of County Road 216 and West of U.S. Highway 17, Palatka, Putnam County, Florida. UTM Coordinates: Zone 17; 434.0 km East; and, 3283.4 km North; Latitude: 29° 41' 00" North; and, Longitude: 81° 40' 4" West.

The existing Bark Hog, installed in the 1970s, is a swing hammer type crusher used to crush and pulverize the oversized bark/wood. The new emissions unit is a Montgomery stationary-style Bark Hog that will utilize a round wheel with chisels and slicers. It will cut the bark/wood, rather than crush them. This project should increase the over-all up-time for the delivery of properly sized bark/wood for firing in the #4 CB and should inevitably reduce the firing of fuel oil.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Initial Title V Air Operation Permit No.: 1070005-002-AV Title V Air Operation Permit Revision No.: 1070005-023-AV

Air Construction Permit No.: 1070005-017-AC Air Construction Permit No.: 1070005-024-AC Air Construction Permit No.: 1070005-025-AC

Documents on file with the Department:

July 13, 2004: Receipt of Application;

August 12, 2004: Request for Additional Information (RAI);

September 13, 2004: Receipt of Response to the RAI;

October 13, 2004: Receipt of E-mail and Attached Letter (hard copy received October 20, 2004); application complete.

December 3, 2004: Receipt of affidavit of proof of publication of the Public Notice.

December 27, 2004: Letter with comments received from Ms. Myra Carpenter.

Michael G. Cooke, Director

Division of Air Resource Management

MGC/tlv/bm

"More Protection, Less Process"

Printed on recycled paper.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date: January 5, 2005 January 31, 2006

County: Putnam

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.

- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does no relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and,
 - b. The period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue: January 5, 2005 Expiration Date: January 31, 2006

County: Putnam

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - (x) Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Compliance with New Source Performance Standards (NSPS)
 - () Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date:

January 5, 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

A. No. 4 Combination Boiler (Emissions Unit 016): 1070005-017-AC. Specific Condition 1. Except for the following changes made to specific condition No. 1, all of the other specific conditions established in air construction permit, No. 1070005-017-AC, shall remain unchanged unless otherwise noted.

FROM:

1. Permitted Capacity. The maximum heat input rate is:

Maximum Heat Input (MMBtu/hr)	Fuel Options
512.7 1	Carbonaceous fuel only
	Or
	Carbonaceous fuel in combination w/ fuel oil
418.6 1	Fuel oil only

Shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. [Permit #AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

TO:

1. Permitted Capacity. The maximum heat input rate is:

Maximum Heat Input (MMBtu/hr)	Fuel Options	
512.71	Carbonaceous fuel only	
	or	
	Carbonaceous fuel in combination w/ fuel oil	
418.6	Fuel oil only	

Based on 57 tons per hour carbonaceous fuel (bark/wood chips) with an average heating value of 4500 Btu/lb on a wet, as-fired basis (AP-42: Subsection 1.6. Wood Waste Combustion In Boilers).

[AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

B. No. 4 Combination Boiler (Emissions Unit 016): 1070005-024-AC. Specific Conditions B.1.a. and B.1.b. Except for the following changes made to specific conditions Nos. B.1.a. and B.1.b., all of the other specific conditions established in air construction permit, No. 1070005-024-AC, shall remain unchanged unless otherwise noted.

FROM:

B.1.a. <u>Permitted Capacity – Fuel Oil Only</u>. The maximum heat input rate, when firing fuel oil only, is 418.6 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1070005-017-AC; FINAL Title V Operation Permit No. 1070005-023-AV]

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

Date of Issue:

1070005

Putnam

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

January 5, 2005

Expiration Date:

January 31, 2006

County:

SPECIFIC CONDITIONS:

B.1.b. <u>Permitted Capacity – Carbonaceous Only or in Combination with Fuel Oil</u>. The maximum heat input rate, when firing carbonaceous fuel only or in combination with fuel oil is 512.7 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1070005-017-AC; FINAL Title V Operation Permit No. 1070005-023-AV]

TO:

B.1.a. <u>Permitted Capacity – Fuel Oil Only.</u> The maximum heat input rate, when firing fuel oil only, is 418.6 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-017-AC; 1070005-023-AV; and, 1070005-028-AC]

B.1.b. <u>Permitted Capacity – Carbonaceous Only or in Combination with Fuel Oil</u>. The maximum heat input rate, when firing carbonaceous fuel only or in combination with fuel oil, is 512.7 MMBtu/hr (based on 57 tons per hour carbonaceous fuel (bark/wood chips) with an average heating value of 4500 Btu/lb on a wet, as-fired basis (AP-42: Subsection 1.6. <u>Wood Waste Combustion In Boilers</u>).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-017-AC; 1070005-023-AV; and, 1070005-028-AC]

C. No. 5 Power Boiler (Emissions Unit 015): 1070005-024-AC. Specific Condition A.1. Except for the following changes made to specific condition No. A.1., all of the other specific conditions established in air construction permit, No. 1070005-024-AC, shall remain unchanged unless otherwise noted.

FROM:

A.1. <u>Permitted Capacity</u>. The maximum heat input rate is 568.9 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; FINAL Title V Operation Permit No. 1070005-023-AV]

TO:

A.1. <u>Permitted Capacity</u>. The maximum heat input rate is 568.9 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-023-AV; and, 1070005-028-AC]

- D. No. 4 Power Boiler (Emissions Unit 014): 1070005-025-AC. Specific Condition 4. Except for the following changes made to specific condition No. 4., all of the other specific conditions established in air construction permit, No. 1070005-025-AC, shall remain unchanged unless otherwise noted.

 FROM:
- 4. <u>Permitted Capacity EU014.</u> The maximum heat input rate is 134 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.] [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number:

1070005 1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date: January 5, 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

TO:

4. <u>Permitted Capacity EU014.</u> The maximum heat input rate is 134 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

E. No. 5 Power Boiler (Emissions Unit 015): 1070005-025-AC. Specific Condition 5. Except for the following changes made to specific condition No. 5., all of the other specific conditions established in air construction permit, No. 1070005-025-AC, shall remain unchanged unless otherwise noted.

FROM:

5. <u>Permitted Capacity (EU015)</u>. The maximum heat input rate is 568.9 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

TO:

5. <u>Permitted Capacity (EU015)</u>. The maximum heat input rate is 568.9 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

F. New Bark Hog and the Existing Bark/Wood Chip Handling System (Emissions Unit 039).

DESCRIPTION: The existing Bark Hog, installed in the 1970s, is a swing hammer type crusher used to crush and pulverize the oversized bark/wood. Since this operation has experienced considerable down time by pluggage and choking and has had difficulty in hammering the bark/wood into uniform and easily handled sized chips, a new Bark Hog will be installed to replace the existing one. The new emissions unit is a Montgomery stationary-style Bark Hog that will utilize a round wheel with chisels and slicers. It will cut the bark/wood, rather than crush them. This project should increase the over-all up-time for the delivery of properly sized bark/wood for firing in the #4 CB and should inevitably reduce the firing of fuel oil.

The existing Bark/Wood Chip Handling System receives bark/wood from either the adjacent roundwood processing facility or from offsite purchased bark/wood. The bark/wood from the roundwood processing facility is transferred to the Transfer Tower via a covered conveyor. It is then transferred to the Hog Tower through a covered conveyor, where it is screened and either sent to the storage silo (which pneumatically feeds the #4 CB) or to the Bark Hog for chipping and transferring to the storage silo feeding the #4 CB. The offsite purchased bark/wood is unloaded in a staging area using a hydraulic truck hopper, where it is placed in a storage pile by a front-end loader, and then transferred to the Transfer Tower through a series of covered conveyors and chutes, after which it takes the same routes as the roundwood to get to the storage silo feeding the #4 CB.

The Bark/Wood Chip Handling System utilizes the following measures to control and minimize fugitive particulate matter (PM/PM10) emissions: covers on most conveyors; enclosure of all conveyor transfer points; limits on front end loader speeds when operating in the storage pile area; enclosure of the screen silo for bark/wood chips; total enclosure of the Bark Hog; and, a pneumatic system (with a cyclone) used to transfer bark/wood chips from the storage silo to the #4 CB.

The following specific conditions apply to the new Bark Hog and the Existing Bark/Wood Chip Handling System (Emissions Unit 039):

- 1. The new Bark Hog shall be installed as described in the Application to Construct received July 13, 2004; and, the existing Bark Hog will be removed from service upon the installation completion of the new Bark Hog. Any deviations shall be provided to the Department by the Professional Engineer of Record.
- 2. <u>Unconfined Emissions of Particulate Matter</u>. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter (PM) from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following: a) Paving and maintenance of

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

1070005

Permit/Cert Number:

1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date:

January 5, 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

roads, parking areas and yards; b) application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent PM from becoming airborne; e) landscaping or planting of vegetation; f) use of hoods, fans, filters, and similar equipment to contain, capture and/or vent PM; g) confining abrasive blasting where possible; and, h) enclosure or covering of conveyor systems. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rules 62-296.320(4)(c)1., 3. & 4., F.A.C.]

Potential to Emit (PTE).

3. <u>Permitted Capacity</u>. For PSD purposes, the PTE is based on a processing rate of 499,320 tons/yr of bark and wood. [Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions, PTE; and, application received July 13, 2004]

Best Management Practices to Minimize VOC Emissions from the Outside Storage of Bark and Wood Chips.

4. Pursuant to the BACT determination, Best Management Practices (BMP) shall be used to minimize VOC emissions from the outside storage of bark and wood chips. Therefore, a BMP Plan to minimize the VOC emissions from the outside storage of bark and wood chips shall be submitted to the NED for approval as part of the facility's application for an operation permit (Title V Renewal due prior to April 30, 2005) and shall be finalized and incorporated into the Title V Air Operation Permit. [Rules 62-4.070(3), 62-212.400(6), BACT, and 62-213.400(1) & (2),F.A.C.; and, applicant request]

INTEROFFICE MEMORANDUM

TO:

Michael Cooke

FROM:

Bruce Mitchell

THRU:

Trina Vielhauer Jim Pennington

SUBJECT:

Final Air Construction Permit No.: 1070005-028-AC/PSD-FL-341

Georgia-Pacific Corporation

Palatka Operations

DATE:

January 4, 2005

The attached Final Air Construction Permit is being issued to allow the construction of a new Bark Hog, which replaces the existing one; to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units. These changes will occur at the existing Georgia-Pacific Corporation's Palatka Mill located North of County Road 216 and West of U.S. Highway 17, Palatka, Putnam County, Florida.

Comments were received from the applicant during the Public Notice period. The changes made are not considered to be significant. Therefore, it is recommended that the permit be issued with the changes made and as noted in the Final Determination.

MGC/tlv/bm

Attachment

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you Attach this card to the back of the mallpiece or on the front if space permits. 1. Article Addressed to: Mr. Theodore D. Kennedy Vice President-Palatka Operations Georgia-Pacific Corporation	A Strington Agent Agent Addressee Received by Printed Name) C. Date of Delivery D. Is delivery address different from Item 17 Yes If YES, enter delivery address below: No	
Palatka Mill Post Office Box 919 Palatka, Florida 32178-0919	3. Service Type A Certified Mail	
	4. Restricted Delivery? (Extra Fee)	
2. Article Number (Transfer from service label) 7000 1670 0013 3109 8826		
PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540		

ĺ	U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
8826			
Pole Eloo	Postage Certifled Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required)	\$	Postmark Here
7000 3670	Total Postage & Fees \$ SeWr. Theodore D. Kennedy, Vice President SiGEORGA PRESIDENC Corporation Post Office Box 919 Craffic Living Signer 18:40, Florida 32178-0919 PS Form 3800, May 2000 See Reverse for Instructions		