

From: Felton-Smith, Rita
Sent: Thursday, June 26, 2003 3:31 PM
To: Mitchell, Bruce
Subject: Comments on GP Application
Bruce,

After scanning through the application fairly quickly, I had the following comments. Most of them, I think we talked about already, but here they are:

1. It appears that the calculation used to correct the dscfm to the 8 or 10% oxygen is incorrect. It looks like it the following was used:

corrected dscfm = dscfm x [(21-%O2 measured)/(21-%O2 desired)] instead of:

corrected dscfm = dscfm x [(21-%O2desired)/(21-%O2measured)]

2. I also question how the dscfm has increased over the years for both the No. 4 Recovery Boiler and the No. 4 Lime Kiln.

3. I also agree that the 95% Confidence Level approach shouldn't be used in determining the corrected dscfm for the overall PM and individual emission unit PM limits. Pursuant to 63.865(a), Q is the average volumetric gas flow rate that is measured during the performance test. It also seems that the highest Q from the last performance test would represent the worse-case and that should be used.

4. In Table 3, the facility states that the BLS used in the calculations were based on the permit limit of 105 Tons/hr of BLS. In accordance with 63.865(a), the BLS to be used in the calculation for the individual and overall PM limit is supposed to be the bls firing rate measured during the performance test.

Rita

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 7 of 8

| | | |
|--|------------------------------|---|
| 1. Pollutant Emitted: SO ₂ | | |
| 2. Total Percent Efficiency of Control: | % | |
| 3. Primary Control Device Code: | | |
| 4. Secondary Control Device Code: | | |
| 5. Potential Emissions: | 109.9 lbs/hr | 481.4 tons/yr |
| 6. Synthetically Limited? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. Range of Estimated Fugitive/Other Emissions: | | |
| <input type="checkbox"/> 1 | <input type="checkbox"/> 2 | <input type="checkbox"/> 3 _____ to _____ tons/yr |
| 8. Emission Factor: 37.5 ppmvd @ 8% O ₂ | | |
| Reference: FDEP Limitation | | |
| 9. Emissions Method Code: | | |
| <input type="checkbox"/> 1 | <input type="checkbox"/> 2 | <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 |
| 10. Calculation of Emissions: See PSD Report | | |
| 11. Pollutant Potential/Estimated Emissions Comment: | | |

6/26/03

Dear Dick,

On Tuesday, I asked Tammy to help me evaluate a statistical issue contained in an application that I am reviewing for completeness. Tammy informed me that she had spoken with you and you gave her the OK to assist me in the review. My sincere apology to you for not approaching you first as her supervisor. Therefore, this message is to express my appreciation for allowing Tammy to devote some of her time to assist me and to tell you "thanks". In the future, I will involve you first and ask for permission to tap one of your staff in a project that I am involved in where I need some outside expertise. Again, many thanks. Take care.

Bruce

COMMENTS ON G-P PALATKA

① REF. PG 3 OF PART B, 3.1 "PREVIOUS BACT"

- G-P CLAIMS RB & LK BACT LIMITS WERE SET ON THE BASIS OF GRAW LOADING. G-P CONCLUDES THAT IF FLOW GOES UP, THEN BACT LIMIT LIKEWISE GOES UP.

→ PSD-FL-226 FOR RB CLEARLY INDICATES THAT GRAW LOADING (g/dscf), lbs/hr, AND TPY ARE ALL SEPARATELY APPLICABLE LIMITS.

→ PSD-FL-226 & PSD-FL-171 BOTH SPECIFY COMPLIANCE DETERMINATION FOR PM TO BE EPA METHOD 5. METHOD 5 DOES RETURN g/dscf, BUT PROVIDES FOR MEASURING FLOWRATE CONCURRENTLY (TO OBTAIN lb/hr).

→ BACT FOR RB/LK/SID IS 114.17 lb/hr IN TOTAL, OR APPROX. 500 TPY. BUBBLE REQUESTED BY G-P IS 561 TPY.

→ ACTUAL OPERATION FOR RB/LK/SID ~~IS~~ HAS BEEN

AUG LAST 2 YEARS = 224 TONS (01-02)
HIGH 2 OF LAST 5 = 333 TONS (00-01)

- ∴ → EVEN ASSUMING THAT BACT IS A FLOATING EMISSION LIMIT THAT RAISES (& LOWERS!) WITH FLOWRATE, THIS CHANGE REQUESTED BY G-P WOULD TRIGGER PSD REVIEW... BUT REGARDLESS, I DON'T BELIEVE THE BACT lb/hr AND TPY NUMBERS SHOULD "FLOAT."

② MAW POINT, AS WE DISCUSSED:

MACT II SAYS BUBBLE CAN'T BE GREATER THAN 2 OF OTHERWISE APPLICABLE MACT STANDARDS

BUT THIS SHOULD HAVE NO BEARING ON BACT!

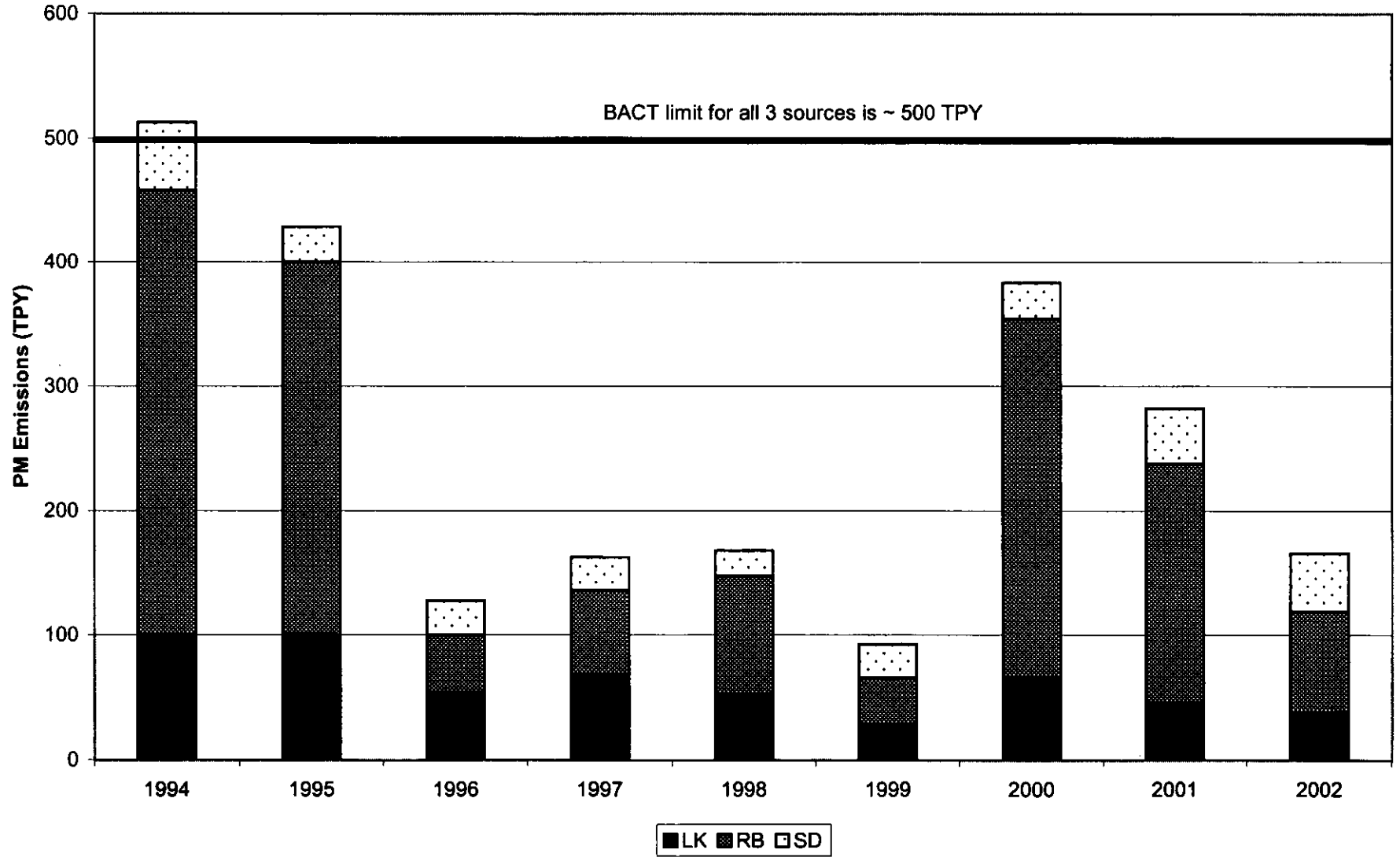
WHY WOULD ESTABLISHING A BUBBLE TO DEMONSTRATE COMPLIANCE WITH MACT II RELAX EXISTING BACT STDS?

③ MACT II REQUIRES USE OF AUG VOLUMETRIC FLOW RATE FROM PERFORMANCE TEST ①

22-141 50 SHEETS
22-142 100 SHEETS
22-143 200 SHEETS



G-P Palatka



Do not hit the 'back' button on your browser, that will re-submit the query. Click [HERE](#) to go back.

AOR Segment Pollutant

This Ad hoc report allows query of the allowable emissions data.

Data for this Report is One Day Old PRODUCTION Data.

Table or View: AOR_SEG_POLLUTANT_VW

BACT LIMIT = 2K 113.87
 RB 331.13 ≈ 500 TPY
 SD 55.19

Ad Hoc Reporting

Grouped by YEAR

| AIRS ID | SITE NAME | EU ID | EU DESCRIPTION | POLLUTANT | ANNUAL EMISSION |
|---|---------------------------------------|-------|--|-----------|-----------------|
| YEAR 1994 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 100 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 358.3 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 54.3 |
| Total 1994 ANNUAL EMISSION = 512.6 | | | | | |
| Records in YEAR 1994 group: 3 | | | | | |
| YEAR 1995 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 100 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 300 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 28.6 |
| Total 1995 ANNUAL EMISSION = 428.6 | | | | | |
| Records in YEAR 1995 group: 3 | | | | | |
| YEAR 1996 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 53.9 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 46.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 27.4 |
| Total 1996 ANNUAL EMISSION = 127.7 | | | | | |
| Records in YEAR 1996 group: 3 | | | | | |
| YEAR 1997 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 68.8 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 67.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 26.4 |
| Total 1997 ANNUAL EMISSION = 162.6 | | | | | |
| Records in YEAR 1997 group: 3 | | | | | |
| YEAR 1998 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 52.8 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 95 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 20.4 |
| Total 1998 ANNUAL EMISSION = 168.2 | | | | | |
| Records in YEAR 1998 group: 3 | | | | | |
| YEAR 1999 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 28.2 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 37.5 |

Division of Air Ad Hoc Reporting

6/13/2003

| | | | | | |
|---|---------------------------------------|----|--|----|-----------|
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 27 |
| Total 1999 ANNUAL EMISSION = 92.7 | | | | | |
| Records in YEAR 1999 group: 3 | | | | | |
| YEAR 2000 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 0 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 66.7 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 287.7 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 0.03 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 29.1 |
| Records in YEAR 2000 group: 5 $\Sigma = 383.53$ | | | | | |
| YEAR 2001 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 46.1 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 192.2 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 44.1 |
| Records in YEAR 2001 group: 5 $\Sigma = 282.40$ | | | | | |
| YEAR 2002 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 17 | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | PM | 38.729475 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | 80.68998 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 18 | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | 19 | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | PM | 46.651505 |

Total 2002 ANNUAL EMISSION = 832.0096

Records in YEAR 2002 group: 5 $\Sigma = 166.07$

Grand Total ANNUAL EMISSION = 2324.40096

A Grand Total of 33 Records were returned.

select AIRSID,NAME,EU_NO,EU_DESCRIPTION,YEAR,POLLUTANT,ANNUAL_EMS from Arms_Snap.AOR_SEG_POLLUTANT_VW where 1 = 1 AND AIRSID = '1070005' AND EU_NO BETWEEN '17' AND '19' AND POLLUTANT = 'PM' order by YEAR,EU_NO

Copyright © 2000 and Disclaimer - State of Florida
All rights reserved

Revised: March 25, 2003

Do not hit the 'back' button on your browser, that will re-submit the query. Click [HERE](#) to go back.

AOR Segment Pollutant

This Ad hoc report allows query of the allowable emissions data.

Data for this Report is One Day Old PRODUCTION Data.

Table or View: [AOR_SEG_POLLUTANT_VW](#)

Ad Hoc Reporting

Grouped by EU ID

| AIRS ID | SITE NAME | EU DESCRIPTION | YEAR | POLLUTANT | ANNUAL EMISSION |
|---|---------------------------------------|--|------|-----------|-----------------|
| EU ID 17 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1994 | PM | 100 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1995 | PM | 100 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1996 | PM | 53.9 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1997 | PM | 68.8 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1998 | PM | 52.8 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 1999 | PM | 28.2 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2000 | PM | 0 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2000 | PM | 66.7 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2001 | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2001 | PM | 46.1 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2002 | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A | 2002 | PM | 38.729475 |
| Records in EU ID 17 group: 12 | | | | | |
| <i>BACT LIMIT = 26.0 lb/hr = 113.88 TPY</i> | | | | | |
| EU ID 18 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1994 | PM | 358.3 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1995 | PM | 300 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1996 | PM | 46.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1997 | PM | 67.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1998 | PM | 95 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 1999 | PM | 37.5 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2000 | PM | 287.7 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2000 | PM | 0.03 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2001 | PM | 192.2 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2001 | PM | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2002 | PM | 80.68998 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 RB (REC'Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A | 2002 | PM | |
| Records in EU ID 18 group: 12 | | | | | |
| <i>BACT LIMIT = 75.6 lb/hr = 331.13 TPY</i> | | | | | |
| EU ID 19 | | | | | |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1994 | PM | 54.3 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1995 | PM | 28.6 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1996 | PM | 27.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1997 | PM | 26.4 |

Division of Air Ad Hoc Reporting

6/13/2003

| | | | | | |
|---------|---------------------------------------|--|------|----|-----------|
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1998 | PM | 20.4 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 1999 | PM | 27 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 2000 | PM | 29.1 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 2001 | PM | 44.1 |
| 1070005 | GEORGIA-PACIFIC CORP. PULP/PAPER MILL | #4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBE | 2002 | PM | 46.651505 |

Records in EU ID 19 group: 9

BACT LIMIT = ^{12.6}~~26.0~~ lb/hr = ~~13.80~~ 55.19 TPY

A Grand Total of 33 Records were returned.

select AIRSID,NAME,EU_NO,EU_DESCRIPTION,YEAR,POLLUTANT,ANNUAL_EMS from Arms_Snap.AOR_SEG_POLLUTANT_VW where I = 1 AND AIRSID = '1070005' AND EU_NO BETWEEN '17' AND '19' AND POLLUTANT = 'PM' order by EU_NO, YEAR

Copyright © 2000 and Disclaimer - State of Florida

All rights reserved

Revised: March 25, 2003

PERMITTEE:
Georgia-Pacific Corporation

PERMIT NUMBER: AC54-266676
(PSD-FL-226)

SPECIFIC CONDITIONS:

Emission Limitations

4. Maximum emissions from the No. 4 Recovery Boiler shall not exceed any of the following:

| Pollutant | Emission Factor | lbs/hr | TPY |
|----------------------|---------------------------------------|--------|--------|
| PM/PM _{10a} | 0.030 gr/dscf @ 8% O ₂ | 75.6 | 331.1 |
| SO ₂ | 75 ppmvd @ 8% O ₂ | 109.9 | 481.4 |
| NO _x | 80 ppmvd @ 8% O ₂ | 168.5 | 738.1 |
| CO | 800 ppmvd @ 8% O ₂ (3-hr) | 1025.4 | |
| | 400 ppmvd @ 8% O ₂ (24-hr) | 512.7 | 2245.6 |
| VOC | 0.30 lb/ton BLS | 31.5 | 138.0 |
| SAM | 0.81 ppmvd | 3.20 | 14.2 |
| TRS* | 7.0 ppmvd @ 8% O ₂ | 10.9 | 47.7 |
| Beryllium | 0.5 lb/E+12 Btu | 6.4E-4 | 2.8E-3 |

^aTotal PM measured by EPA Method 5

* 12-month rolling average. Maximum of 11.2 ppmvd @ 8 percent oxygen and 17.5 lbs/hr is maximum allowable TRS emissions during any 12 hour period.

Visible emissions shall not exceed 20 percent opacity (BACT).

5. Maximum emissions from the TRS incinerator controlling the emissions from the digester system, multi-effect evaporator systems, and condensate stripper system shall not exceed any of the following:

Natural Gas or Methanol Fuel

| Pollutant | Emission Factor | lbs/hr | TPY |
|----------------------|--|-------------|--------|
| PM/PM _{10a} | permit | 5.5 | 24.1 |
| SO ₂ | 5.085 lbs/ton ADUP | 383 (24-hr) | 1677.5 |
| SAM | 4% of SO ₂ as SO ₃ | 18.8 | 82.2 |
| TRS | 5 ppmvd @ 10% O ₂ | 0.12 | 0.53 |

Note: ^aTotal PM measured by EPA Method 5
^bbased on 50% TRS control efficiency of the scrubber

Visible emissions shall not exceed 5 percent opacity except 20 percent opacity is allowed for 3 minutes in any 1 hour period (Rule 62-296.401(1), F.A.C.).

PERMITTEE:

Permit Number: AC 54-192551

PSD-PL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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 measurements;
- 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.

SPECIFIC CONDITIONS:

1. The No. 4 Lime Kiln (LK) may operate continuously (i.e., 8760 hrs/year).

2. The No. 4 LK's maximum total process input rate/capacity is 82,986 lbs/hr CaCO₃ and inerts; and, the maximum product rate is 38,889 lbs/hr (dry) @ 90% CaO.

3. For the No. 4 LK and pursuant to BACT, the maximum allowable pollutant emission limiting standards/rates are:

*PM/PM₁₀

0.081 gr/dscf, corrected to 10% O₂
(26.0 lbs/hr; 113.9 TPY)
99.0% efficiency

*NOx

290 ppmvd, corrected to 10% O₂
(50.3 lbs/hr; 223.3)
kiln design and operation

*CO

69 ppmvd, corrected to 10% O₂
(7.3 lbs/hr; 32.0)
kiln design and operation

*VOC

185 ppmvd, corrected to 10% O₂
(17.2 lbs/hr; 75.3 TPY)
kiln design and operation

*VE

less than 20% opacity
(deferred due to moisture interference)

PERMITTEE:

Permit Number: AC 54-192551

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

4. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H_2S) shall not exceed 20 ppmvd, corrected to 10% O_2 (4.0 lbs/hr; 17.5 TPY).
5. Sulfur dioxide (SO_2) emissions shall not exceed 10.9 lbs/hr (47.7 TPY; based on AP-42 factor of 0.3 lb/ton ADUP, 72.9 TPH ADUP, 638,604 TPY ADUP, and 50% efficiency on the control of SO_2).
6. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
7. Due to moisture interference, the visible emission limiting standard of "less than 20% opacity", in accordance with BACT, is not applicable. However, if the Department observes visible emissions of 20% opacity pursuant to F.A.C. Rule 17-2.700(6)(b)9, DER Method 9, it shall be considered good reason to believe that the applicable PM/ PM_{10} mass emission standard is in danger of being violated and the permittee shall be required to conduct a special PM/ PM_{10} mass emissions compliance test in accordance with F.A.C. Rule 17-2.700(2)(b). Such a test shall be conducted within 14 days after the Department has notified the permittee in writing of the applicability of this permit condition.
8.
 - a. The initial and annual compliance tests for PM/ PM_{10} shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, which includes EPA Methods 1-4, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;
 - b. The initial and annual compliance tests for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;
 - c. The initial and annual compliance tests for H_2SO_4 and SO_2 shall be conducted using EPA Method 8, Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;
 - d. The initial and annual compliance tests for NOx shall be conducted using EPA Method 7E, Determination of Nitrogen Oxide Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;

PERMITTEE:

Permit Number: AC 54-193841

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

GENERAL CONDITIONS:

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 measurements;
- 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.

SPECIFIC CONDITIONS:

1. The No. 4 Smelt Dissolving Tanks (SDTs; North and South units) may operate continuously (i.e., 8760 hrs/year).

2. The No. 4 SDTs total maximum processing rate/capacity is 85,890 lbs/hr smelt (green liquor solids) and based on the No. 4 Recovery Boiler burning 323,077 lbs/hr black liquor @ 65% solids, which is equivalent to 210,000 lbs/hr black liquor solids (BLS @ 100%).

3. Total reduced sulfur (TRS) emissions as hydrogen sulfide (H₂S) shall not exceed 0.048 lb/3000 pounds BLS (3.4 lbs/hr, 14.9 TPY; based on a maximum total process input rate/capacity of 210,000 lbs/hr BLS in the No. 4 Recovery Boiler (RB) - equivalent to 85,890 lbs/hr smelt (green liquor solids)).

4. PM/PM₁₀ mass emissions shall not exceed 0.12 lb/ton BLS to the No. 4 RB (12.6 lbs/hr; 55.2 TPY), which is based on BACT.

5. Due to moisture interference, the visible emission limiting standard of "less than 20% opacity", in accordance with BACT, is not applicable. However, if the Department observes visible emissions of 20% opacity pursuant to F.A.C. Rule 17-2.700(6)(b)9, DER Method 9, it shall be considered good reason to believe that the applicable PM/PM₁₀ mass emission standard is in danger of being violated and the permittee shall be required to conduct a special PM/PM₁₀ mass emissions compliance test in accordance with F.A.C. Rule 17-2.700(2)(b). Such a test shall be conducted within 14 days after the Department has notified the permittee in writing of the applicability of this permit condition.

PERMITTEE:

Permit Number: AC 54-193841

PSD-FL-171

Georgia-Pacific Corporation

Expiration Date: May 31, 1992

SPECIFIC CONDITIONS:

6. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
7.
 - a. Initial and annual compliance tests for PM/PM₁₀ shall be conducted using EPA Method 5, Determination of Particulate Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A;
 - b. Initial and annual compliance tests for TRS shall be conducted using EPA Method 16 or 16A, Determination of TRS Emissions from Stationary Sources, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.
8. For the No. 4 SDTs, the permittee shall comply with all of the applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).
9. Pursuant to F.A.C. Rule 17-2.600(4)(c)4.b., the No. 4 SDTs are subject to the applicable provisions of F.A.C. Rule 17-2.710, Continuous Monitoring Requirements, which includes F.A.C. Rule 17-2.710(4), Quarterly Reporting Requirements.
10. For the No. 4 SDTs, the permittee shall comply with all of the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.
11. The Department's Northeast District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2). Written reports of the tests shall be submitted to the Department's Northeast District office within 45 days of completion of the last test run pursuant to F.A.C. Rule 17-2.700(7).
12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).
13. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

6/3/03

Rita,

The NESHAP is 40 CFR 63, Subpart MM for the RBs, SDTs and LK; and, they are asking for a bubble that seems, upon first review, less stringent than the requirements of the NESHAP. We need to be very careful on this one! I'll be talking with you soon, I'm sure. Take care.

Bruce

-----Original Message-----

From: Felton-Smith, Rita
Sent: Tuesday, June 03, 2003 2:53 PM
To: Mitchell, Bruce
Subject: RE: GP - MACT letter

Bruce,

So it is an application. The project is not PSD? Are they asking for a PCP Exemption? Possibly why they sent to AI? Is this for brown stock washers perhaps?

I will be on the lookout for them.
Thanks.

Rita

-----Original Message-----

From: Mitchell, Bruce
Sent: Tuesday, June 03, 2003 12:36 PM
To: Felton-Smith, Rita
Cc: Sheplak, Scott
Subject: RE: GP - MACT letter

6/3/03

Dear Rita,

The applications and cover letter are on the way (I got a copy yesterday...not sure why they were sent to AL?). Their calculations for most of the pollutants are incorrect. When you get the application, please give me a call and I will point out the problem that I see with their calculations. I will continue to review the application and provide you with timely comments in an e-mail. Take care.

Bruce

-----Original Message-----

From: Felton-Smith, Rita
Sent: Tuesday, June 03, 2003 12:28 PM
To: Mitchell, Bruce
Subject: GP - MACT letter

Bruce,

Deneen told me that you called. No, we didn't receive a copy of the GP letter concerning the MACT.

If you would, please send us a copy (FAX if the number of pages allow).

Thank you.

Rita

6/3/03

Dear Rita,

The applications and cover letter are on the way (I got a copy yesterday...not sure why they were sent to AL?). Their calculations for most of the pollutants are incorrect. When you get the application, please give me a call and I will point out the problem that I see with their calculations. I will continue to review the application and provide you with timely comments in an e-mail. Take care.

Bruce

-----Original Message-----

From: Felton-Smith, Rita

Sent: Tuesday, June 03, 2003 12:28 PM

To: Mitchell, Bruce

Subject: GP - MACT letter

Bruce,

Deneen told me that you called. No, we didn't receive a copy of the GP letter concerning the MACT.

If you would, please send us a copy (FAX if the number of pages allow).

Thank you.

Rita