



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 3, 2009

Sent by Electronic Mail – Received Receipt Requested

Mr. Gary L. Frost, Vice-President Operations
Georgia-Pacific Consumer Operations LLC
Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

Re: Project No. 1070005-062-AC
No. 4 Combination Boiler
Fiber Rejects Project

Dear Mr. Frost:

On May 28, 2009, you requested authorization to co-fire fiber rejects (rejected knots and shives from the digestion process) as a fuel to supplement the burning of bark/wood along with other authorized fuels. The existing Palatka Mill is a pulp and paper mill located in Putnam County, North of CR 216 and West of US 17 in Palatka, Florida. Enclosed are the following documents: Written Notice of Intent to Issue Air Permit; Public Notice of Intent to Issue Air Permit; Technical Evaluation and Preliminary Determination; and Draft Permit with Appendices.

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. If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Georgia-Pacific Consumer Operations LLC
P.O. Box 919
Palatka, Florida 32178-0919

Project No. 1070005-062-AC
Georgia-Pacific Palatka Mill
No. 4 Combination Boiler
Fiber Rejects Project

Authorized Representative:

Mr. Gary Frost, Vice-President Operations

Putnam County, Florida

Facility Location: Georgia-Pacific Consumer Operations LLC operates the existing Palatka Mill, which is located in Putnam County, North of CR 216 and West of US 17 in Palatka, Florida.

Project: The applicant requests authorization to fire of up to 6% by weight knots and rejects in the No. 4 Combination Boiler with bark/wood and other authorized fuels. Combined with other contemporaneous projects at the Palatka Mill, the project is not expected to result in significant net emissions increases and is not subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration of Air Quality. Details of the project are provided in the attached Technical Evaluation and Preliminary Determination.

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, Florida Administrative Code (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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Draft Permit, the 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 or phone number listed above.

Notice of Intent to Issue 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 appropriate 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 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 notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-

Georgia-Pacific Consumer Operations LLC
Palatka Mill - No. 4 Combination Boiler

Project No. 1070005-062-AC
Fiber Rejects Project

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the 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 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the 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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. 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 the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, 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.

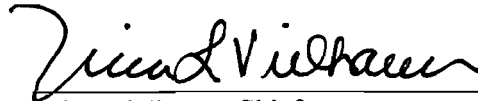
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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 proposed decision; (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, 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 Written 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

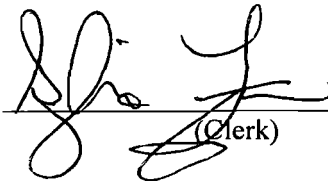
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 9/4/09 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC (michael.curtis@gapac.com)
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC (ron.reynolds@gapac.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Catherine Collins, Fish and Wildlife Service (catherine_collins@fws.gov)
- Ms. Vickie Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

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



(Clerk)

9/4/09
(Date)

Florida Department of Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *AK*
From: Bruce Mitchell, SMNew Source Review Section
Date: September 1, 2009
Subject: Draft Minor Source Air Construction Permit
Project No. 1070005-062-AC
Georgia-Pacific Consumer Operations LLC
Palatka Mill - No. 4 Combination Boiler
Fiber Rejects Project

Attached for your review is a draft minor air construction permit package for the existing Georgia-Pacific Palatka Mill. Briefly, the draft permit authorizes the co-firing of knots and rejects with bark/wood and other authorized fuels. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is not considered a new source review reform project and is not subject to PSD preconstruction review. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/bm

P.E. CERTIFICATION STATEMENT

PERMITTEE

Georgia-Pacific Consumer Operations LLC
P.O. Box 919
Palatka, Florida 32178-0919

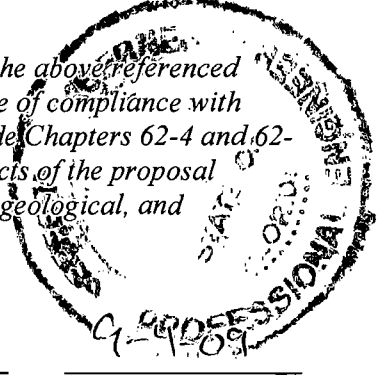
Project No. 1070005-062-AC
Georgia-Pacific Palatka Mill
No. 4 Combination Boiler
Fiber Rejects Project

PROJECT DESCRIPTION

Currently, the No. 4 Combination Boiler is authorized to fire bark/wood as the primary fuel and No. 6 fuel oil as a startup and supplemental fuel. The applicant requests authorization to fire of up to 6% by weight knots and rejects in the No. 4 Combination Boiler with bark/wood and other authorized fuels. Knots are pieces of uncooked wood that are removed from the brown stock pulp prior to the brown stock washing process. Rejects are shives or splinters that are removed by a screening operation after the brown stock washing process. Both knots and rejects (collectively called "fiber rejects") contain wood fiber that has not been completely digested and a small amount of residual black liquor from the digestion process.

Because the properties of fiber rejects are so similar to bark and wood, no emissions increases are expected except for sulfur dioxide (SO₂). This is because of the residual black liquor on the fiber rejects, which contains additional sulfur. Based on an annual limit of 8000 tons of fiber rejects per year, potential SO₂ emissions are estimated to increase by 86.4 tons of per year. However, other contemporaneous projects at the Palatka Mill will decrease overall SO₂ emissions such that the project is not subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration of Air Quality. The project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner
Jeffery F. Koerner, P.E.
Registration Number 49441

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit
Project No. 1070005-062-AC
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. Gary Frost, Vice-President Operations, P.O. Box 919, Palatka, Florida 32178-0919.

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

Project: Currently, the No. 4 Combination Boiler is authorized to fire bark/wood as the primary fuel and No. 6 fuel oil as a startup and supplemental fuel. The applicant requests authorization to fire of up to 6% by weight knots and rejects in the No. 4 Combination Boiler with bark/wood and other authorized fuels. Knots are pieces of uncooked wood that are removed from the brown stock pulp prior to the brown stock washing process. Rejects are shives or splinters that are removed by a screening operation after the brown stock washing process. Both knots and rejects (collectively called "fiber rejects") contain wood fiber that has not been completely digested and a small amount of residual black liquor from the digestion process.

Because the properties of fiber rejects are so similar to bark and wood, no emissions increases are expected except for sulfur dioxide (SO₂). This is because of the residual black liquor on the fiber rejects, which contains additional sulfur. Based on an annual limit of 8000 tons of fiber rejects per year, potential SO₂ emissions are estimated to increase by 86.4 tons per year. However, other contemporaneous projects at the Palatka Mill will decrease overall SO₂ emissions such that the project is not subject to preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration of Air Quality.

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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the 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. In addition, electronic copies of these documents are available on the following web site:

<http://www.dep.state.fl.us/air/emission/apds/default.asp>

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 proposed 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, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed 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 notice results in a different decision or a significant change of terms or conditions.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

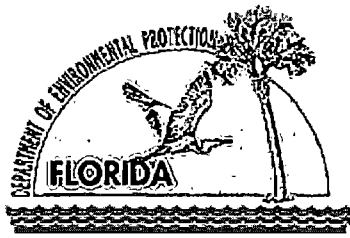
Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the 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 at 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 days of publication of this 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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (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, 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 Public 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 for this proceeding.



**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

PROJECT

Project No. 1070005-062-AC
Draft Air Construction Permit
Georgia-Pacific Palatka Mill
Facility ID No. 1070005
No. 4 Combustion Boiler, Fiber Rejects Project

COUNTY

Putnam County, Florida

APPLICANT

Georgia-Pacific Consumer Operations LLC
Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation – New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

September 3, 2009

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility and Location

The Georgia-Pacific Consumer Operations LLC (G-P) operates an existing pulp and paper mill (SIC Nos. 2611 and 2621) in Palatka located North of CR 216 and West of US 17, Putnam County, Florida. The UTM coordinates of this facility are: Zone 17; 434.0 kilometers (km) East; and 3283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for each air pollutant subject to a state or federal Ambient Air Quality Standard (AAQS).

The existing mill uses the Kraft sulfate process in which the digesting liquor (white cooking liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to process the green liquor to cooking liquor.

Steam and energy needs are met by the power boilers, which burn a variety of fuels including fuel oil and natural gas. The recovery boiler, lime kiln and power boiler all fire fuels and produce products of incomplete combustion including carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfuric acid mist (SAM), sulfur dioxide (SO₂), total reduced sulfur (TRS), and volatile organic compounds (VOC). On the following page, Figure 10.2-1 shows the typical process flow for a Kraft sulfate pulping and recovery process.

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution.

2. PSD APPLICABILITY

General PSD Applicability

The Department regulates major stationary sources in accordance with Florida’s PSD program pursuant to Rule 62-212.400, F.A.C. A PSD preconstruction review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards or areas designated as “unclassifiable” for a given pollutant. A facility is considered “major” with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories; or, 5 tons per year or more of lead.

New projects at existing PSD-major stationary sources are reviewed for PSD applicability based on net emissions increases from the project. Each PSD pollutant is evaluated for applicability based on emissions thresholds known as the Significant Emission Rates as defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered “significant”. In addition, applicants may choose to conduct a “PSD netting analysis” that includes all emissions increases as well as all emissions decreases for a 5-year period contemporaneous with the project to determine whether or not a PSD significant emissions increase will occur. Although a facility may be “major” for only one PSD pollutant, the project may be “significant” for several PSD pollutants. For each significant PSD pollutant, the applicant must employ the Best Available Control Technology (BACT) to minimize emissions and conduct an air quality analysis that demonstrates emissions from the project will not cause or contribute to adverse ambient impacts.

PSD Applicability for the Project

The project is located in Putnam County, which is in an area that is currently in attainment with the state and federal Ambient Air Quality Standards or otherwise designated as unclassifiable. The existing facility is an existing PSD major stationary source. New projects must be reviewed for PSD applicability.

The following table compares the typical properties of bark/wood fuel with those of fiber rejects.

Property	Bark/Wood^{1,2}	Fiber Rejects³
Higher Heating Value	8000 – 9000 Btu/lb, dry	7650 Btu/lb, dry
Moisture Content	35%-55% by weight	56.25% by weight
Sulfur	0.1% by weight, as-fired	0.54% by weight, as-fired
Ash Content	18.5% by weight	18.6% by weight

As shown, fiber rejects are actually wood fibers with properties similar to bark/wood. Since only 6% of the bark/wood/reject fuel blend will be fiber rejects, combustion in the No. 4 Combination Boiler is not expected to increase any criteria pollutants other than SO₂ because of the higher sulfur content caused by the residual black liquor. The ultimate analysis of fiber rejects from this plant indicates a sulfur content of 0.54% by weight. Based on this sulfur content and a maximum annual firing rate of 8000 tons/year of fiber rejects, potential SO₂ emissions from the project are estimated to be:

$$SO_2 = (8000 \text{ tons/year of rejects})(0.0054 \text{ tons S/tons rejects})(2 \text{ tons } SO_2/\text{ton S}) = 86.4 \text{ tons/year}$$

¹ “Section 1.6, Wood Residue Combustion in Boilers”, *Compilation of Air Pollutant Emission Factors*, Volume I (AP-42), U.S. EPA, Fifth Edition, As Updated

² Application No. 0510003-046-AC, U.S. Sugar Request for a Trial Burn of Sweet Sorghum, August 2009

³ Application No. 1070005-062-AC, G-P Request to Fire Fiber Rejects, Attachment B, May 2009

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Information from the National Council for Air and Stream Improvement^{4,5} indicates that as much as 70% of the sulfur in the fiber rejects may be retained in the unburned carbon or adsorbed on the alkaline ash generated during combustion of the wood fibers. This would reduce the SO₂ emissions from 86.4 to 25.9 tons/year.

In addition, G-P is authorized for and has completed several recent projects resulting in SO₂ emissions increases and decreases. The following table summarizes the projects and the net SO₂ emissions changes for the 5-year period contemporaneous with the project.

Project	Change in SO ₂ Emissions tons/year
Permit No. 1070005-024-AC, Brown stock washer and oxygen delignification system	+236.3
Permit No. 1070005-028-AC, Replacement of bark hog	---
Permit No. 1070005-036-AC, Addition of 3 rd field for No. 5 Boiler	---
Permit No. 1070005-038-AC (PSD-FL-380), Conversion of No. 4 Power Boiler to natural gas	-3314.9
Permit No. 1070005-041-AC, Nos. 3-4-5 Tissue machine project	+10.0
Permit No. 1070005-049-AC, Replacement of scrubber for tall oil plant	---
Permit No. 1070005-050-AC, Revised fuel oil limits for No. 4 Recovery Boiler	---
Permit No. 1070005-051-AC, Authorize tall oil for No. 4 Lime Kiln, No. 4 Recovery Boiler and No. 4 Combination Boiler	---
Permit No. 1070005-053-AC, Authorization for consumed air project for No. 4 Recovery Boiler	---
Permit No. 1070005-056-AC, Removal of annual limits on firing natural gas in No. 7 Package Boiler	Negligible
Permit No. 1070005-059-AC, Permitting of ultra-low sulfur diesel fuel for No. 4 Recovery Boiler	+0.3
Permit No. 1070005-062-AC, Fiber reject project	86.4
Net SO ₂ Emissions Change	-2981.9

Even considering no additional SO₂ reduction by the alkaline fly ash, the fiber reject project combined with the other net increases and decreases at the plant will not result in a net increase in SO₂ emissions. There will be similar decreases in SAM and TRS emissions. Note that the above table does not include Permit No. 1070005-045-AC (PSD-FL-393) since this project has not been completed, but will result in SO₂ emissions reductions when the No. 4 Combination Boiler is converted to natural gas. Therefore, the project does not trigger PSD preconstruction review.

3. NSPS APPLICABILITY

NSPS Applicability

Although no physical change is required to fire fiber rejects, it is considered a change in the method of operation. Since the sulfur content of fiber rejects is higher than bark/wood, short-term SO₂ emissions will increase. Although this could be considered a modification pursuant to the NSPS provisions of 40 CFR 60, there are no SO₂ emissions standards for firing wood in Subpart Db for Industrial-Commercial-Institutional

⁴ *Technical Bulletin No. 906: Alternative Fuels Used in the Forest Industry: Their Composition and Impact on Emissions*; National Council for Air and Stream Improvement; September 2005

⁵ *Special Report No. 09-02: Sulfur Capture in Combination Bark Boilers – An Update*; National Council for Air and Stream Improvement; March 2009

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Steam Generating Units. The maximum hourly emissions rates for other pollutants are not expected to increase. Therefore, there are no new applicable requirements from NSPS Subpart Db.

Since fuel oil may be used to supplement bark/wood fuels, the applicant requests a reduction in the maximum amount of fuel oil firing to ensure that the maximum hourly SO₂ emissions rate will not increase. The applicant proposes to reduce maximum fuel oil firing from 2791 to 2604 gallons per hour (418.6 to 390.6 MMBtu/hour). As a check, the Department estimated SO₂ emissions as shown in the following table.

Parameter	Bark/Wood	Fiber Rejects	Fuel Oil	Total
<i>Before Project</i>				
Heat Input rate	145.4 MMBtu/hour	---	418.6 MMBtu/hour	564 MMBtu/hour
Firing Rate	15.3 tons/hour	---	2791 gallons/hour	---
Sulfur Content	0.1% by weight	---	2.35% by weight	---
SO ₂ , lb/MMBtu	0.42	---	2.48	---
SO ₂ , lb/hour	61.1	---	1038.1	1099.2
<i>After Project</i>				
Heat Input rate	166.1 MMBtu/hour	7.3 MMBtu/hour	390.6 MMBtu/hour	564 MMBtu/hour
Firing Rate	17.5 tons/hour	1.1 tons/hour	2604 gallons/hour	---
Sulfur Content	0.1% by weight	0.54% by weight	2.35% by weight	---
SO ₂ , lb/MMBtu	0.42	3.2	2.48	---
SO ₂ , lb/hour	69.8	23.4	968.7	1061.9

The above table assumes the following as-fired heating values: 4750 Btu/lb for bark/wood, 3347 Btu/lb fiber rejects and 150,000 Btu/gallon for fuel oil. Fiber rejects will be pre-mixed with bark/wood at a blend rate of 6% by weight. Based on these assumptions and the proposed decreases in the maximum fuel oil firing rate, the maximum hourly SO₂ emissions rate will not increase.

4. DEPARTMENT REVIEW

Current Applicable Requirements

The No. 4 Combination Boiler is currently subject to the following industry-specific state regulations:

- Rule 62-296.404, F.A.C., for Kraft Pulp Mills (incineration of TRS gases); and
- Rule 62-212.400, F.A.C., for PSD preconstruction review (Permit No. PSD-FL-393). This project includes the conversion of the No. 4 Combination Boiler from supplemental fuel oil to natural gas. This project has been delayed because of the current economic conditions.

The No. 4 Combination Boiler is also currently subject to the following federal regulations:

- 40 CFR 63, NESHAP Subpart A for the general provisions; and
- 40 CFR 63, NESHAP Subpart S for Kraft Pulp Mills (incineration of TRS gases).

This project will not change any of the applicable provisions for the No. 4 Combination Boiler, which remains subject to all applicable conditions in the current Title V air operation permit.

Conclusion

The Department will issue a draft air construction permit authorizing the use of fiber rejects as a supplemental fuel to be co-fired with bark/wood and other authorized fuels for the No. 4 Combination Boiler and include the following requirements:

- No more than 8000 tons of fiber rejects shall be fired in any calendar year.
- Reduce the short-term fuel oil consumption to 2604 gallons/hour and the heat input rate to 390.6

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

MMBtu/hour.

- To the extent practicable when firing fiber rejects, the permittee shall blend fiber rejects with bark/wood at no more than 6% by weight of fiber rejects. The permittee shall document the method by which the solid fuel blend was achieved.
- The permittee shall record the amount (tons) of fiber rejects fired for each calendar day.
- The permit supplements all previous permits issued for the affected emissions unit.
- Once each year, the permittee shall analyze a representative sample of fiber rejects for the following: higher heating value, moisture content, sulfur content and ash content.

5. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit documents. Jeff Koerner, P.E. is the Air Permitting Supervisor responsible for reviewing and editing the draft permit package. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE:

Georgia-Pacific Consumer Operations LLC
P.O. Box 919
Palatka, Florida 32178-0919

Authorized Representative:

Mr. Gary Frost, Vice President Operations

Project No. 1070005-062-AC
Permit Expires: October 1, 2011

Palatka Mill
No. 4 Combination Boiler
Fiber Rejects Project

PROJECT AND LOCATION

Georgia-Pacific Consumer Operations LLC operates the existing Palatka Mill, which is located in Putnam County, North of CR 216 and West of US 17 in Palatka, Florida. This permit authorizes the firing of fiber rejects (rejected knots and shives from the digestion process) as a fuel to supplement the burning of bark/wood and other authorized fuels in the No. 4 Combination Boiler (EU-017).

STATEMENT OF BASIS

This minor source air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The project is subject to the general preconstruction review requirements of Rule 62-212.300, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida.

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

Effective Date

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

The pulp and paper mill is categorized under Standard Industrial Classification Coe Nos. Nos. 2611 and 2621. The existing mill uses the Kraft sulfate process in which the digesting liquor (white cooking liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to process the green liquor to cooking liquor.

Steam and energy needs are met by the power boilers, which burn a variety of fuels including fuel oil and natural gas. The recovery boiler, lime kiln and power boiler all fire fuels and produce products of incomplete combustion including carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfuric acid mist (SAM), sulfur dioxide (SO₂), total reduced sulfur (TRS), and volatile organic compounds (VOC).

PROJECT DESCRIPTION

Currently, the No. 4 Combination Boiler is authorized to fire bark/wood as the primary fuel and No. 6 fuel oil as a startup and supplemental fuel. Georgia-Pacific Consumer Operations LLC (G-P) holds an air construction permit (Permit No. 1070005-045-AC/PSD-FL-393) to eventually convert this boiler to natural gas. For this project, Permit No. 1070005-062-AC authorizes the firing of up to 6% by weight knots and rejects in the No. 4 Combination Boiler with bark/wood and other authorized fuels. Knots are pieces of uncooked wood that are removed from the brown stock pulp prior to the brown stock washing process. Rejects are shives or splinters that are removed by a screening operation after the brown stock washing process. Both knots and rejects (hereafter referred to collectively as "fiber rejects") contain fiber that has not been completely digested and a small amount of residual black liquor from the digestion process.

Historically, fiber rejects were ground and mixed into natural grades of unbleached paper products. However, the demand for natural grade products has been greatly reduced and much of this material is now dewatered and disposed of in the on-site landfill. Authorization to fire fiber rejects will allow the recovery of energy from this material, offset other fuels and eliminate land-filling. Fiber rejects will continue to be dewatered to remove much of the residual black liquor. Fiber rejects will be co-fired with bark/wood and represent approximately 6% of the total charge. Approximately 80 tons/day of fiber rejects will be co-fired with 1368 tons/day of bark/wood. The heat input rate of fiber rejects will be included with the heat input from bark/wood to demonstrate compliance with the current annual heat input limit of 4,042,127 million British thermal units (MMBtu) per hour.

REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: All documents related to applications for permits to construct, operate or modify emissions unit shall be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection (Department), at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be submitted to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office. The mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida, 32256-7590. The phone number is 904/807-3300.
3. Appendices: The following appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms), Appendix B (General Conditions) and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. Construction and Expiration: The Department may extend the expiration date upon a satisfactory showing that an extension is justified. Such a request shall be submitted to the Department's Bureau of Air Regulation at least 60 days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1) and 62-212.400(12), F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. This permit authorizes construction of the referenced facilities. [Chapters 62-210 and 62-212, F.A.C.]
8. Title V Air Operation Permit: This permit authorizes the proposed work and initial operation to determine compliance. A Title V Air Operation Permit is required for regular operation of the permitted emission units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213.420, F.A.C.]

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

No. 4 Combination Boiler

The specific conditions of this subsection apply to the following existing emission unit.

EU ID	Emission Unit Description
017	No. 4 Combination Boiler

EXISTING PERMITS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4.070(3), F.A.C.]

AUTHORIZED FUEL

2. Fiber Rejects: The permittee is authorized to co-fire knots and rejects (hereafter referred to collectively as “fiber rejects”) with the primary fuel of bark/wood along with other authorized fuels. Knots are pieces of uncooked wood that are removed from the brown stock pulp prior to the brown stock washing process. Rejects are shives or splinters that are removed by a screening operation after the brown stock washing process. Fiber rejects contain wood fiber that has not been completely digested and a small amount of residual black liquor from the digestion process. The firing of fiber rejects shall be limited to:
 - a. The permittee shall follow the written blending practices to blend no more than 6% by weight of fiber rejects with bark/wood. At maximum capacity, this means that approximately 80 tons/day of fiber rejects will be co-fired with 1368 tons/day of bark/wood.
 - b. No more than 8000 tons of fiber rejects shall be fired during any consecutive 12 months.
 - c. The heat input rate provided by fiber rejects shall be considered as heat input rate from firing bark/wood.[Application No. 1070005-062-AC and Rule 62-4.070(3), F.A.C.]

PERMITTED CAPACITY

3. Permitted Capacity – Residual Fuel Oil: Upon introducing fiber rejects as a fuel, the maximum heat input rate from firing fuel oil in the No. 4 Combination Boiler shall be 390.6 MMBtu per hour (24-hour average) based on firing 2604 gallons per hour with a reference heating value of 150,000 Btu/gallon. [Application No. 1070005-062-AC and Rule 62-4.070(3), F.A.C.]

EMISSIONS STANDARDS

4. Existing Standards: The No. 4 Combination Boiler remains subject to all applicable requirements in the current Title V air operation permit. No new emissions standards are imposed by this permit. [Rules 62-4.070(3) and 62-210.300 and Chapter 62-213, F.A.C.]

MONITORING REQUIREMENTS

5. Sampling/Analysis: During each federal fiscal year, the permittee shall have a representative sample analyzed for the higher heating value, moisture content, ash content and sulfur content. Results of the analyses shall be submitted to the Compliance Authority within 45 days of conducting the analyses. The analyses shall be used to estimate emissions from firing fiber rejects for the annual operating reports. [Rules 62-4.070(3), F.A.C.]

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

No. 4 Combination Boiler

6. **Blending Practices:** The permittee shall develop written procedures for blending fiber rejects with bark/wood. The purpose of the written procedures is to ensure that best efforts are used to blend no more than 6% by weight of fiber rejects with bark/wood. The permittee shall train operators in these practices. [Rule 62-4.070(3), F.A.C.]

7. **Recordkeeping:** The permittee shall maintain a written or electronic log of the amount of fiber rejects fired during each day. Within 10 days following each calendar month, the permittee shall record the amount of fiber rejects for the previous month and 12 months rolling total. [Rule 62-4.070(3), F.A.C.]

APPENDICES

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

SECTION 4. APPENDIX A
CITATION FORMATS AND GLOSSARY OF COMMON TERMS

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CO: carbon monoxide

COMS: continuous opacity monitoring system

SECTION 4. APPENDIX A

CITATION FORMATS AND GLOSSARY OF COMMON TERMS

DEP: Department of Environmental Protection	NESHAP: National Emissions Standards for Hazardous Air Pollutants
Department: Department of Environmental Protection	NO_x: nitrogen oxides
dscfm: dry standard cubic feet per minute	NSPS: New Source Performance Standards
EPA: Environmental Protection Agency	O&M: operation and maintenance
ESP: electrostatic precipitator (control system for reducing particulate matter)	O₂: oxygen
EU: emissions unit	Pb: lead
F.A.C.: Florida Administrative Code	PM: particulate matter
F.D.: forced draft	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
F.S.: Florida Statutes	PSD: prevention of significant deterioration
FGR: flue gas recirculation	psi: pounds per square inch
Fl: fluoride	PTE: potential to emit
ft²: square feet	RACT: reasonably available control technology
ft³: cubic feet	RATA: relative accuracy test audit
gpm: gallons per minute	SAM: sulfuric acid mist
gr: grains	scf: standard cubic feet
HAP: hazardous air pollutant	scfm: standard cubic feet per minute
Hg: mercury	SIC: standard industrial classification code
I.D.: induced draft	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
ID: identification	SO₂: sulfur dioxide
kPa: kilopascals	TPH: tons per hour
lb: pound	TPY: tons per year
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

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 these 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 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 no 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 not 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 permittee to cause pollution in contravention of F.S. 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 or 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 and records 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 noncompliance, 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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence

SECTION 4. APPENDIX B
GENERAL CONDITIONS

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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. 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:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
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 or 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:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) 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.

SECTION 4. APPENDIX C
COMMON CONDITIONS

Unless otherwise specified in the permit, the following conditions apply.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

{Permitting Note: Rule 62-210-700(Excess Emissions), F.A.C. cannot vary or supersede any federal provision of the New Source Performance Standards (NSPS) or the National Emission Standards for Hazardous Air Pollutants (NESHAP) programs.}

RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Friday, September 04, 2009 2:40 PM
To: gary.frost@gapac.com
Cc: michael.curtis@gapac.com; mjaguila@gapac.com; ron.reynolds@gapac.com; Kirts, Christopher; abrams.heather@epamail.epa.gov; forney.kathleen@epamail.epa.gov; catherine_collins@fws.gov; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.062.AC.D_pdf.zip

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

Facility Name: PALATKA PULP and PAPER MILL

Project Number: 1070005-062-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION/ ADD PULP FIBER REJECTS AS FUEL

Facility County: PUTNAM

Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Frost, Gary (Florida) [GARY.FROST@GAPAC.com]
Sent: Wednesday, September 16, 2009 9:41 AM
To: Livingston, Sylvia
Subject: RE: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC
Attachments: RE: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

Sylvia

I'm sorry for the confusion – Ron Reynolds replied on 4 Sept – See Attached

Gary Frost

Vice President, Palatka Operations

Office - 386-329-0063

Cell - 920-445-1031

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, September 16, 2009 9:33 AM
To: Frost, Gary (Florida)
Subject: FW: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

Dear Mr. Frost:

We have not received confirmation that you were able to access the documents attached to this September 4th e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your “receipt confirmation” reply serves the same purpose as tracking the receipt of the signed “Return Receipt” card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few

minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Livingston, Sylvia

Sent: Friday, September 04, 2009 2:40 PM

To: gary.frost@gapac.com

Cc: michael.curtis@gapac.com; mjaguila@gapac.com; ron.reynolds@gapac.com; Kirts, Christopher; abrams.heather@epamail.epa.gov; forney.kathleen@epamail.epa.gov; catherine_collins@fws.gov; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)

Subject: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

Dear Sir/ Madam:

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Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

Facility Name: PALATKA PULP and PAPER MILL

Project Number: 1070005-062-AC

Permit Status: DRAFT

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Facility County: PUTNAM

Processor: Bruce Mitchell

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Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

Livingston, Sylvia

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Friday, September 04, 2009 2:44 PM
To: Livingston, Sylvia
Cc: Frost, Gary (Florida); Kelley, Tracey S.; Curtis, Michael
Subject: RE: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

We are in receipt of the documents.

Thank you,

Ron Reynolds
Environmental Engineer - Air Quality
Georgia Pacific - Palatka Mill
Office 386-329-0967
Cell 386-916-3133

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

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, September 04, 2009 2:40 PM
To: Frost, Gary (Florida)
Cc: Curtis, Michael; Aguilar, Mark J.; Reynolds, Ron E.; Kirts, Christopher; abrams.heather@epamail.epa.gov; forney.kathleen@epamail.epa.gov; catherine_collins@fws.gov; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: GA-Pacific Palatka Pulp & Paper Mill; 1070005-062-AC

Dear Sir/ Madam:

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Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

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Processor: Bruce Mitchell

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Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<<http://www.adobe.com/products/acrobat/readstep.html>

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