

Florida Department of  
Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section  
From: Bruce Mitchell, New Source Review Section  
Date: October 1, 2009  
Subject: Final Minor Source Air Construction Permit  
Project No. 1070005-062-AC  
Georgia-Pacific Consumer Operations LLC  
Palatka Mill - No. 4 Combination Boiler  
Fiber Rejects Project

The final permit for this project is attached for your approval and signature. The project requires a minor air construction permit to authorize the co-firing of knots and rejects with bark/wood and other authorized fuels. The project will not change the throughput capacity of the No. 4 Combination Boiler. The proposed work will be performed at the existing Palatka Mill, which is located in Putnam County, north of CR 216 and west of US 17 in Palatka, Florida. The project is not considered a new source review reform project.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

JK/tlv/jfk/rbm



# 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

## PERMITTEE:

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

### *Authorized Representative:*

Mr. Gary Frost, Vice President Operations

Air Permit 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.

Joseph Kahn, Director  
Division of Air Resource Management

10/2/09  
Effective Date

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit by:

Georgia-Pacific Consumer Operations LLC  
Post Office Box 919  
Palatka, Florida 32178-0919

Air Permit No. 1070005-062-AC  
Palatka Mill  
No. 4 Combination Boiler Modification  
Fiber Rejects Project

*Authorized Representative:*

Mr. Gary Frost, Vice President Operations

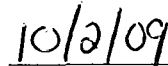
Georgia-Pacific Consumer Operations LLC operates the existing paper and pulp mill in Putnam County located North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. This final air construction permit authorizes the co-firing of knots and rejects with bark/wood and other authorized fuels. The project will not change the throughput capacity of the No. 4 Combination Boiler. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Trina L. Vielhauer, Chief  
Bureau of Air regulation



(Date)

TLV/jfk/bm

**NOTICE OF FINAL PERMIT**

---

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final 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 10/5/09 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC ([gary.frost@gapac.com](mailto:gary.frost@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. Wayne Galler, Georgia-Pacific Consumer Operations LLC ([wjgaller@gapac.com](mailto:wjgaller@gapac.com))
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC ([ron.reynolds@gapac.com](mailto:ron.reynolds@gapac.com))
- Mr. Chris Kirts, DEP Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

Clerk Stamp

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

  
\_\_\_\_\_  
(Clerk)

10/5/09  
(Date)

## FINAL DETERMINATION

---

### PERMITTEE

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

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. 1070005-062-AC  
Palatka Mill  
No. 4 Combination Boiler Modification

The project required a minor air construction permit to authorize the co-firing of knots and rejects with bark/wood and other authorized fuels. The project will not change the throughput capacity of the No. 4 Combination Boiler. The proposed work will be performed at the existing Palatka Mill.

### NOTICE AND PUBLICATION

The Department distributed an initial Intent to Issue Permit package on September 4, 2009. The applicant published the Public Notice of Intent to Issue in the Palatka Daily News on September 12, 2009. The Department received the proof of publication on September 18, 2009. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

### COMMENTS

On September 15, 2009, the Department received comments from the applicant via e-mail. The following summarizes the comments and the Department's response.

In Specific Conditions 2 and 6, the applicant requested a change in the projected percentage of fiber rejects that can be burned in a day from 6% to 10%, which better reflects the maximum blend of fiber rejects with bark/wood. There was no request made to change the permit's maximum tons of fiber rejects that can be burned in a day, which is 80 tons. The reference to "1368 tons/day of bark/wood" is unnecessary and may cause confusion. The boiler is currently limited to 57 tons/hour of bark/wood (1368 tons/day). Air construction Permit No. PSD-FL-393 authorizes up to 59.4 tons/hour of bark/wood (1425.6 tons/day) once modifications are completed. The applicant requests removal of "1368 tons/day" because fiber rejects are limited to 80 tons/day.

*Response:* The Department finds the requests to be acceptable and the changes will be made as follows. In addition, the permit's Project Description in Section I, General Information, Page 2 of 5, will also be changed to reflect the acceptable changes being made to Specific Conditions 2 and 6.

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:

## FINAL DETERMINATION

---

- a. The permittee shall follow the written blending practices to blend ~~no more than 6%~~ approximately 10% by weight of fiber rejects with bark/wood. ~~At maximum capacity, this means that approximately~~ No more than 80 tons/day of fiber rejects ~~will~~ shall 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.]

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%~~ approximately 10% by weight of fiber rejects with bark/wood. The permittee shall train operators in these practices. [Rule 62-4.070(3), F.A.C.]

### CONCLUSION

The final action of the Department is to issue the permit as noticed with the minor changes noted above.

## SECTION 1. GENERAL INFORMATION

---

### FACILITY DESCRIPTION

The pulp and paper mill is categorized under Standard Industrial Classification Code 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<sub>x</sub>), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), sulfuric acid mist (SAM), sulfur dioxide (SO<sub>2</sub>), 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 10% 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 10% of the total charge. No more than 80 tons/day of fiber rejects shall be co-fired with 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

---

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

### 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 approximately 10% by weight of fiber rejects with bark/wood. No more than 80 tons/day of fiber rejects shall be co-fired with 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.]
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

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

---

#### No. 4 Combination Boiler

approximately 10% 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**

---

|   |  |
|---|--|
| <b>DEP:</b> Department of Environmental Protection                                      | <b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants                                       |
| <b>Department:</b> Department of Environmental Protection                               | <b>NO<sub>x</sub>:</b> nitrogen oxides   |
| <b>dscfm:</b> dry standard cubic feet per minute  | <b>NSPS:</b> New Source Performance Standards  |
| <b>EPA:</b> Environmental Protection Agency   | <b>O&amp;M:</b> operation and maintenance  |
| <b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter) | <b>O<sub>2</sub>:</b> oxygen   |
| <b>EU:</b> emissions unit   | <b>Pb:</b> lead  |
| <b>F.A.C.:</b> Florida Administrative Code  | <b>PM:</b> particulate matter  |
| <b>F.D.:</b> forced draft   | <b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less              |
| <b>F.S.:</b> Florida Statutes   | <b>PSD:</b> prevention of significant deterioration  |
| <b>FGR:</b> flue gas recirculation  | <b>psi:</b> pounds per square inch   |
| <b>Fl:</b> fluoride   | <b>PTE:</b> potential to emit  |
| <b>ft<sup>2</sup>:</b> square feet  | <b>RACT:</b> reasonably available control technology   |
| <b>ft<sup>3</sup>:</b> cubic feet   | <b>RATA:</b> relative accuracy test audit  |
| <b>gpm:</b> gallons per minute  | <b>SAM:</b> sulfuric acid mist   |
| <b>gr:</b> grains   | <b>scf:</b> standard cubic feet  |
| <b>HAP:</b> hazardous air pollutant   | <b>scfm:</b> standard cubic feet per minute  |
| <b>Hg:</b> mercury  | <b>SIC:</b> standard industrial classification code  |
| <b>I.D.:</b> induced draft  | <b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides) |
| <b>ID:</b> identification   | <b>SO<sub>2</sub>:</b> sulfur dioxide  |
| <b>kPa:</b> kilopascals   | <b>TPH:</b> tons per hour  |
| <b>lb:</b> pound  | <b>TPY:</b> tons per year  |
| <b>MACT:</b> maximum achievable technology  | <b>UTM:</b> Universal Transverse Mercator coordinate system  |
| <b>MMBtu:</b> million British thermal units   | <b>VE:</b> visible emissions   |
| <b>MSDS:</b> material safety data sheets  | <b>VOC:</b> volatile organic compounds   |
| <b>MW:</b> megawatt   |  |

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

---

The permittee shall comply with the following general conditions from Rule 624.160, 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:** Monday, October 05, 2009 9:13 AM  
**To:** 'gary.frost@gapac.com'  
**Cc:** 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'wjgaller@gapac.com'; 'ron.reynolds@gapac.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); 'forney.kathleen@epa.gov'; 'catherine\_collins@fws.gov'  
**Subject:** GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC  
**Attachments:** 1070005-062-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** 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.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.062.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

**Facility Name:** PALATKA PULP and PAPER MILL

**Project Number:** 1070005-062-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**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 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 at (850)488-0114.

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

## Livingston, Sylvia

---

**From:** Frost, Gary (Florida) [GARY.FROST@GAPAC.com]  
**Sent:** Tuesday, October 13, 2009 5:59 AM  
**To:** Livingston, Sylvia  
**Cc:** Reynolds, Ron E.; Curtis, Michael  
**Subject:** RE: GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC

Sylvia

*Thank you for the follow up – We have received it and can access it. Sorry for the delay*

*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:** Monday, October 12, 2009 11:42 AM  
**To:** gary.frost@gapac.com  
**Subject:** FW: GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC

Dear Mr. Frost:

We have not received confirmation that you were able to access the documents attached to this October 5th 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](mailto: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:** Monday, October 05, 2009 9:13 AM  
**To:** 'gary.frost@gapac.com'  
**Cc:** 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'wjgaller@gapac.com'; 'ron.reynolds@gapac.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); 'forney.kathleen@epa.gov';

'catherine\_collins@fws.gov'

**Subject:** GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** 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.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.062.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

**Facility Name:** PALATKA PULP and PAPER MILL

**Project Number:** 1070005-062-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**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 at (850)488-0114.

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

## Livingston, Sylvania

---

**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Monday, October 05, 2009 9:36 AM  
**To:** Livingston, Sylvania  
**Subject:** RE: GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC

Permit documents have been received.

Thank you,

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

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

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, October 05, 2009 9:13 AM  
**To:** Frost, Gary (Florida)  
**Cc:** Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.; Reynolds, Ron E.; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); forney.kathleen@epa.gov; catherine\_collins@fws.gov  
**Subject:** GA-Pacific Consumer Operations, LLC - Palatka Pulp & Pamer Mill; 1070005-062-AC

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** 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.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.062.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-062-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**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