

Memorandum

Florida Department of Environmental Protection

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *JK*
From: Bobby Bull, New Source Review Section *LLB*
Date: March 7, 2011
Subject: Draft Minor Source Air Construction Permit
Project No. 1070005-066-AC
Georgia Pacific Consumer Operations, LLC- Palatka Mill
Natural Gas Burners at No. 4 Combination Boiler

Attached for your review is a draft minor air construction permit package for the existing Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida. Briefly, the draft permit authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is considered a new source review reform project. Day 90 of the permitting time clock is April 10, 2011. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/rlb

P.E. CERTIFICATION STATEMENT

PERMITTEE

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


Draft Permit No. 1070005-066-AC
Palatka Mill
Natural Gas Burners at No. 4
Combination Boiler
Putnam County, Florida

PROJECT DESCRIPTION

The applicant proposes to replace the existing fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section at the existing No. 4 combination boiler (EU 016).

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. 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).



Robert L. Bull, Jr., P.E.
Registration Number 69071

3/3/11

(Date)



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 10, 2011

Sent by Electronic Mail – Received Receipt Requested

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

Re: Project No. 1070005-066-AC
Georgia Pacific Consumer Operations, LLC, Palatka Mill
Natural Gas Burners at No. 4 Combination Boiler

Dear Mr. Frost:

On January 10, 2011, you submitted an application requesting to replace the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the 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, Bobby Bull, P.E., at 850/717-9111.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/rlb

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, FL 32178-0919

Project No. 1070005-066-AC
Minor Air Construction Permit

Authorized Representative:
Gary L. Frost, Vice President Operations

Palatka Mill
Natural Gas Burners at No. 4
Combination Boiler
Putnam County, Florida

Facility Location: Georgia-Pacific Consumer Operations, LLC operates the existing Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida.

Project: The applicant proposes to replace the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section. Details of the project are provided in the application and the enclosed 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 of the 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 850/717-9000.

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 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 Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 62-110.106(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 the 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

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 Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) 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 March 10, 2011 to the persons listed below.

- Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)
- Mr. David A. Buff, Golder Associates (dbuff@golder.com)
- Mr. Christopher Kirts, Northeast District Office (Christopher.Kirts@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (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.

[Signature] 3/10/11
(Clerk) (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. 1070005-066-AC
Georgia-Pacific Consumer Operations, LLC- Palatka Mill
Putnam County, Florida

Applicant: The applicant for this project is Georgia-Pacific Consumer Operations, LLC. The applicant's authorized representative and mailing address is: Gary L. Frost, Vice President Operations, Georgia-Pacific Consumer Operations, LLC, Palatka Mill, P.O. Box 919, Palatka, FL 32178-0919.

Facility Location: Georgia-Pacific Consumer Operations, LLC operates the existing Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida.

Project: The applicant proposes to replace the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section. The project is not expected to result in any significant increases in emissions.

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 of the 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 Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. 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 850/717-9000.

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 physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project 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 by entering draft permit number:
<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 construction 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.

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 this 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 the 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

(Public Notice to be Published in the Newspaper)

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
&
PRELIMINARY DETERMINATION**

APPLICANT

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

Palatka Mill
Facility ID No. 1070005

PROJECT

Project No. 1070005-066-AC
Application for Minor Source Air Construction Permit
Natural Gas Burners at No. 4 Combination Boiler
New Source Review Reform Project

COUNTY

Putnam County, Florida

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, Florida 32399-2400

March 10, 2011

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 Description and Location

The Palatka Mill is an existing Kraft pulp and paper mill, which is categorized under Standard Industrial Classification Code No. 2611. The existing Palatka Mill is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates of the existing facility are Zone 17, 434.00 km East and 3,283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate 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.

Project Description

On September 9, 2009 the Department issued permit No. 1070005-045-AC, PSD-FL-393 which allowed several modifications to the No. 4 combination boiler in two phases. Phase 1 included upgrades to the bark/wood delivery/storage, increased bark/wood firing rate, addition of an over-fire air system, new mechanical collectors to replace the existing pre-cleaner, bottom ash handling system, ductwork between the No. 4 Combination Boiler and No. 5 Power Boiler and ductwork to assist the over fire air system. Phase 2 included the conversion of the supplemental residual oil firing system for No. 4 Combination Boiler to natural gas and permanently discontinued use of residual oil. All of phase 1 work would be complete before phase 2 modifications would begin construction. The permittee did not start any of the modifications within 18 months of the permit issuance. The project was subject to PSD preconstruction review because of the increased bark feed rate and no work was done under this permit. As part of this permit application, the permittee requested PSD-FL-393 be surrendered (Part B, Page 4 of the application).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This new application contains two modifications originally permitted under permit No. 1070005-045-AC: 1) convert the supplemental residual oil burners for No. 4 Combination Boiler to natural gas burners and permanently discontinue use of residual oil and 2) replace 28 continuous tube sections in the boiler's superheater section. The new application also requests upgrades to the existing mechanical dust collection system and replacement of the existing steam turbine-driven induced draft fan with an electric motor to recover bark/wood firing capacity lost due to down time of the existing drive system.

Processing Schedule

January 10, 2011 Received the application for a minor source air pollution construction permit.
January 20, 2011 Conference call with the permittee. Additional information provided by the applicant.
February 9, 2011 Application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than $1 \mu\text{g}/\text{m}^3$, 24-hour average.

If the potential emissions exceed the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

As provided in the application, the following table 1 summarizes potential emissions and PSD applicability for the project. The footnotes below discuss the methodology of determining the ‘could have accommodated’ bark/wood firing capacity of the unit. This information can also be found in Table 4-9 of the application.

Table 1- Summary of the Applicant’s PSD Applicability Analysis

Pollutant	Annual Emissions, Tons/Year				Subject to PSD?
	Baseline Actual	Projected Actual	Increase	Significant Emissions Rate	
CO	864.20	932.50	68.30	100	No
NO _x	398.75	426.19	27.44	40	No
PM	139.12	140.08	0.96	25	No
PM ₁₀	108.39	110.96	2.57	15	No
PM _{2.5}	96.62	100.88	4.26	10	No
SO ₂	827.99	37.61	-790.38	40	No
SAM	36.82	1.67	-35.15	7	No
VOC	48.98	52.78	3.8	40	No
Pb	.01000	0.0076	-0.0024	0.6	No
Hg	0.0010	0.0009	-0.0001	0.1	No
F	0.084	0	-0.084	3	No

- Activity factors based on annual heat input rate that could have been accommodated during the baseline period due to bark burning (3,239,946 MMBtu/yr for 2002-2003; 3,501,937 MMBTU/yr for 2004-2005). Because the heat input rate that could have been accommodated due to bark burning is higher than the projected actual heat input rate, the heat input rate was reduced to the projected actual heat input rate (2,992,500 MMBtu/yr; see Table 4-7 of the application) minus the restored heat input rate (111,825 MMBtu/yr). The restored heat input rate is based on recovering 35 TPD of bark/wood burning capacity as a result of the dust collector and ID fan projects, and a total of 355 days/year operation.
 - Restored Heat Input Rate: $35 \text{ TPD} \times 355 \text{ day/yr} \times 9 \text{ MMBtu/ton} = 111,825 \text{ MMBtu/yr}$
 - Could have accommodated: $2,992,500 \text{ MMBtu/yr} - 111,825 \text{ MMBtu/yr} = 2,880,675 \text{ MMBtu/yr}$

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. PM₁₀ and particulate matter with a mean particle diameter of 2.5 microns or less (PM_{2.5}) were calculated using emission factors from AP-42 for both filterable and condensable emissions. The application showed that most all of the PM emissions were from bark/wood firing and not the fuel oil to natural gas conversion, and the recovered bark/wood firing would not trigger significant emission rates.

Additionally, the applicant provided a preliminary greenhouse gas (GHG) emission review for this project. The review addressed both Steps 1 and 2 of the EPA’s tailoring rule. The significant emission rate for carbon dioxide equivalents (CO₂e) is 75,000 tons and the permittee is anticipating the overall GHG emissions would decrease due to the fossil fuel component of the boiler’s fuel supply. Therefore, PSD review and BACT determination for GHG emissions will not be required for this project.

3. DEPARTMENT REVIEW

The No. 4 combination boiler is currently in operation at the Palatka Mill and is currently permitted to burn wood/bark and residual fuel oil. The permittee proposes four modifications to the existing unit in this project. The permittee proposes to discontinue the use of fuel oil as a supplemental fuel and instead fire natural gas in its place, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section.

The permittee will continue firing wood/bark as the primary fuel and fire natural gas as a supplemental fuel in lieu of fuel oil. The required annual heat input from natural gas will be the same as that of the fuel oil. The natural gas heat input rating for the burners is slightly higher than the fuel oil heat input rating (427 MMBtu/hr and 418 MMBtu/hr, respectively). Emissions from firing natural gas are not expected to exceed any significant emission rates and SO₂ and SAM emissions should decrease significantly.

The existing dust control system consists of three mechanical dust collectors followed by an electrostatic precipitator. The proposed upgrades to the existing mechanical dust collection system will modify the tertiary dust collector and convert the primary and secondary dust collectors to simple gas ducts. Modifications to the tertiary duct are expected to increase efficiency and reduce maintenance costs. Currently, the dust collection system is operating at 82% control. The vendor guarantees are 84% control so no increases in PM emissions are anticipated from this modification.

The permittee proposes to replace the existing steam turbine-driven induced draft fan-drive with an electric motor for increased efficiency and reduced maintenance. The flow rate for the proposed electric motor will be the same as the existing fan and will result in the restoration of 35 tons/day of bark combustion within the boiler. The permittee considered the restored bark rate as 'could have accommodated' rate in its review of potential emissions. The applicant explains this concept in the footnotes provided in table 4-9 of the application as mentioned in the applicant analysis.

Finally, the permittee has determined that 28 continuous tube sections in the secondary superheater must be replaced in order to withstand the higher temperatures associated with burning natural gas. The work is considered routine maintenance by the permittee and was previously permitted by the Department under permit No. 1070005-038-AC, PSD-FL-380.

Project 1070005-045-AC, PSD-FL-393 was subject to PSD major review based on the revisions at Combination Boiler No. 4 including increased bark/wood firing rate. The applicant has since surrendered this permit and is no longer permitted to increase the bark/wood firing rate. The exclusion of the increase in bark/wood firing rate from this project will show a significant decrease in overall project emissions for this new application. The permittee submitted a revised PSD netting table to show that no changes in PSD applicability resulted in other previous projects as a result of surrendering the PSD permit.

The facility was also subject to Best Available Retrofit Technology (BART) review and the No. 4 combination boiler was analyzed for NO_x, SO₂, and PM emissions as part of the review. The permittee previously provided an air quality modeling analysis to demonstrate that this BART-eligible unit would not be subject to the BART requirements. This analysis remains valid.

The Department's review and analysis focused on actual increases due to the natural gas conversion and the recovered wood/bark firing with the installation of the proposed fan-drive replacement. In Table 2, the Department estimated the difference in emission by comparing the fuel oil baseline emission factors with the AP-42 emission factors for natural gas. As expected, the gas conversion provided large decreases in NO_x, PM/PM₁₀, SAM, SO₂, and VOC emissions. Emission factors provided by the applicant in Table 4.9 of the application were used to calculate projected actual emissions from the recovered bark/wood firing. The applicant estimated that the recovered heat input would be 111,825 MMBtu/year and potential emissions were calculated using the applicant's projected actual emission factors for each pollutant. As shown in the table 3 below, no pollutants were over the significant emission rates.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Table 2- Department's Emissions Comparison Between Fuel Oil and Natural Gas

	Emission Factor Fuel Oil (lb/MMBtu)	Heat Input MMBtu/yr	TPY Fuel Oil change	Emission Factor Natural Gas (lb/MMBtu)	Heat Input MMBtu/yr	TPY Natural Gas Change	TPY Change From Gas Conversion
CO	0.033	695007	11.47	0.1	695007	34.75	23.28
NO _x	0.31	695007	108.77	0.15	695007	52.13	-56.64
PM	0.038	695007	13.21	0.0076	695007	2.64	-10.57
PM ₁₀	0.024	695007	8.34	0.0076	695007	2.64	-5.70
PM _{2.5}	0.015	695007	5.21	0.0076	695007	2.64	-2.57
SO ₂	2.36	695007	820.11	0.0006	695007	0.21	-819.90
SAM	0.11	695007	36.49	0.000027	695007	0.0093	-36.48
VOC	0.0019	695007	0.66	0.0055	695007	1.91	1.25
Pb	0.000010	695007	0.0035	0.00000050	695007	0.00017	-0.0033
Hg	0.00000075	695007	0.00026	0.00000026	695007	0.000091	-0.00017
F	0.00025	695007	0.087	0	695007	0	-0.087

Table 3- Department's PSD Applicability Analysis

Pollutant	Annual Emissions, Tons/Year				Subject to PSD?
	TPY Change from Gas Conversion	Recovered Bark/Wood Change	Total Project Change	Significant Emissions Rate	
CO	23.28	33.60	56.88	100	No
NO _x	-56.64	78.27	21.63	40	No
PM	-10.57	5.14	-5.43	25	No
PM ₁₀	-5.70	4.03	-1.67	15	No
PM _{2.5}	-2.57	3.69	1.12	10	No
SO ₂	-819.90	1.40	-818.5	40	No
SAM	-36.48	0.06	-36.42	7	No
VOC	1.25	1.9	3.15	40	No
Pb ¹	-6.6 lb	0.6 lb	-6.0 lb	1,200 lb	No
Hg ¹	-0.34 lb	0.07 lb	-0.27 lb	200 lb	No
F	-0.087	0	-0.087	3	No

1- Emissions are stated in pounds per year.

Table 4- Comparison of Applicant's and Department's PSD Applicability

Pollutant	Applicant Analysis TPY	Department Analysis TPY
CO	68.30	56.88
NO _x	27.44	21.23
PM	0.96	-5.42
PM ₁₀	2.57	-1.67
PM _{2.5}	4.26	1.12
SO ₂	-790.38	-818.5
SAM	-35.15	-36.42
VOC	3.8	3.15
Pb	-4.8 lb	-6.0 lb
Hg	-0.20 lb	-0.27 lb
F	-0.084	-0.087

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The projected actual emissions calculated by the Department are relatively consistent with those of the applicant, and all projected actual emissions are well below the significant emission rates (Table 4).

The project will not be subject to any new emission rates since most all of the emission rates are expected remain the same or decrease after the conversion. The applicant will be required to submit annual reports for five years to verify emissions have not exceeded the significant emission rates.

4. 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. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Bobby Bull is the project engineer responsible for reviewing the application and drafting the permit. 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, FL 32178-0919

Air Permit No. 1070005-066-AC
Permit Expires: March 1, 2013
Minor Air Construction Permit

Authorized Representative:
Gary L. Frost, Vice President Operations

Palatka Mill
Natural Gas Burners at No. 4
Combination Boiler

PROJECT

This is the final air construction permit, which authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade of the existing mechanical dust collection system, replacement of the existing steam turbine-driven induced draft fan-drive with an electric motor and replacement of 28 continuous tube sections in the boiler's superheater section. The proposed work will be conducted at the existing Palatka Mill, which is a Kraft pulp and paper mill categorized under Standard Industrial Classification No. 2611. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates are Zone 17, 434.00 km East and 3,283.4 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution 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 permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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

(DRAFT)

Trina L. Vielhauer, Acting Director
Division of Air Resource Management

(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) 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 _____ (DRAFT) _____ to the persons listed below.

- Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)
- Mr. David A. Buff, Golder Associates (dbuff@golder.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (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.

(DRAFT)

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 1070005	
ID No.	Emission Unit Description
015	No. 5 Power Boiler
016	No. 4 Combination Boiler
017	No. 4 Lime Kiln
018	No. 4 Recovery Boiler
019	No. 4 Smelt Dissolving Tanks (2)
031	Tall Oil Plant
035	ClO ₂ Plant and Methanol Storage Tank
036	ECF No. 3 Bleach Plant
044	No. 7 Package Boiler
037	Thermal Oxidizer
045	Wide-web Flexographic Printers
046	Condensate Stripper System

PROPOSED PROJECT

The applicant proposes to replace the existing fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section at the existing No. 4 combination boiler (EU 016).

This project will modify the following emissions unit.

Facility ID No. 1070005	
ID No.	Emission Unit Description
016	No. 4 Combination Boiler

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- 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(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District (as applicable) at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a 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, 62-296 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.
5. 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.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the permit requires the annual reporting of actual *NO_x*, *SO₂*, *CO*, *VOC*, and *PM* emissions for the following unit: *Emissions Unit 016 - No. 4 Combination Boiler*.

[Application 1070005-066-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. No. 4 Combination Boiler (EU-016)

This section of the permit addresses the following emissions unit.

No. 4 Combination Boiler (EU-016)

The boiler is a spreader-stoker traveling grate furnace with a pneumatic fuel feed distribution system. It was manufactured by Babcock & Wilcox and constructed in 1965. The primary fuel is bark/wood, which is supplemented with fuel oil. The maximum steam production rate is 475,000 lb/hour based on steam conditions of 900° F at 1275 psi. Particulate matter emissions are controlled by mechanical dust collectors as pre-cleaners to the ESP. The boiler also serves as a backup control device for other permitted operations. The unit continuously monitors TRS emissions. This project includes replacement of supplemental fuel oil with natural gas and upgrading the existing mechanical dust collection system.

EXISTING APPLICABLE REGULATIONS

1. Existing Permits and Regulations: This permit supplements other previously issued air permits for the No. 4 Combination Boiler, which include the following applicable state and federal regulations.
 - a. Pursuant to Rule 62-296.404(3)(f)1, F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for a combustion device incinerating TRS emissions at a Kraft pulp mill.
 - b. Pursuant to Rule 62-296.410(1)(b), F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for an existing carbonaceous fuel fired boiler.
 - c. Pursuant to 40 CFR 63.443(d)(4)(ii), the No. 4 Combination Boiler is subject to the applicable requirements for controlling HAP emissions from the pulping system at Kraft processes. [NESHAP Subpart S in 40 CFR 63]

{Permitting Note: The applicable requirements are specified in the latest Title V air operation permit (No. 1070005-048-AV). This project does not impose any new applicable requirements from these existing regulations.} [Rules 62-296.404 and 62-296.410, F.A.C.; and 40 CFR 63.443]

MODIFICATIONS AND CAPACITIES

2. Modifications: The permittee shall make the following modifications and other related work to the No. 4 Combination Boiler:
 - a. Replace the three existing No. 6 residual oil burners with natural gas burners. Natural gas shall replace No. 6 residual fuel oil as the supplemental fuel supply for No. 4 Combination Boiler. Fuel oil will no longer be permitted after the burner replacement is complete.
 - b. Upgrade the existing mechanical dust collection system. The No. 3 tertiary collector shall be upgraded to become the primary dust collector prior to the electrostatic precipitator.
 - c. Replace the existing steam turbine-drive on the induced draft (ID) fan for the No. 4 combination boiler with an electric motor.
 - d. Replace 28 continuous tube sections in the boiler's superheater section.
3. Authorized Fuels: After completing the modifications, the No. 4 Combination Boiler is authorized to fire bark/wood and natural gas. *{Permitting Note: The No. 4 Combination Boiler is permitted to serve as a control device to combust non-condensable gases, stripper off-gases and dilute non-condensable gases.}* [Rules 62-210.200(PTE) and 62-212.400(PSD), F.A.C.; Permit Nos. 1070005-017-AC, 1070005-024-AC, and 1070005-066-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. No. 4 Combination Boiler (EU-016)

4. Permitted Capacity: After completing the modifications, the No. 4 Combination Boiler is authorized to operate at the following maximum heat input rates.

Fuel Source	Maximum Heat Input Rate
Bark/Wood (alone or combined with other fuels)	564.0 MMBtu/hr, 24-hr average ^a
Natural Gas	427.0 MMBtu/hr, 24-hr average ^b

^a Based on 57.0 tons per hour of bark/wood with an average heating value of 4500 Btu/lb on an as-fired basis (wet).

^b Based on 427,000 cubic feet (cf) per hour of natural gas with an average heating value of 1000 Btu/cf.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit AC54-163040, Permit Nos. 1070005-17-AC, PCP Exclusion dated March 14, 2002, 1070005-024-AC, 1070005-28-AC and 1070005-038-AC; and Application No. 1070005-066-AC]

EMISSIONS STANDARDS

5. 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.]

RECORDKEEPING

6. Steam Records: The permittee shall continuously monitor and record the following steam parameters: steam production rate (lb/hour), steam pressure (psig), steam temperature (° F) and feedwater temperature (° F). [62-4.070(3), F.A.C.]

SECTION 4. APPENDICES (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

SECTION 4. APPENDIX A (DRAFT)
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

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

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

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	PM_{2.5}: particulate matter with a mean aerodynamic diameter of 2.5 microns or less
dscf: dry standard cubic feet	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F: fluoride	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
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	
NESHAP: National Emissions Standards for Hazardous Air Pollutants	

SECTION 4. APPENDIX B (DRAFT)

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 403.141, 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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B (DRAFT)

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
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 (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 for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) 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 the 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 (DRAFT)

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

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 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.]
4. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority 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.]
5. **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.]
6. **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.]
7. **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.]
8. **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.]

RECORDS AND REPORTS

9. **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.]
10. **Emissions Computation and Reporting:**
 - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. **Computation of Emissions.** For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however,

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62 210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

(2) Continuous Emissions Monitoring System (CEMS).

- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62 210.370(2)(b)2., F.A.C., above.

(3) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.

- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(4) Emission Factors.

- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

(5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

(6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

(7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.

(8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

- b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
 - (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
 - (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
 - (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

Walker, Elizabeth (AIR)

From: Walker, Elizabeth (AIR)
Sent: Thursday, March 10, 2011 3:50 PM
To: gary.frost@gapac.com
Cc: ron.reynolds@gapac.com; Mr. David A. Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; Abrams.Heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Bull, Robert
Subject: PALATKA PULP and PAPER MILL; 1070005-066-AC
Attachments: 1070005-066-AC_Signature_Pages.pdf

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/1070005.066.AC.D_pdf.zip

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-066-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION/Natural Gas Burners at No. 4 Combination Boiler
Facility County: PUTNAM

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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.

Elizabeth Walker
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)717-9093

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>> .

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. 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.

Walker, Elizabeth (AIR)

From: Microsoft Exchange
To: 'gary.frost@gapac.com'; 'ron.reynolds@gapac.com'
Sent: Thursday, March 10, 2011 3:50 PM
Subject: Relayed: PALATKA PULP and PAPER MILL; 1070005-066-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'gary.frost@gapac.com'

'ron.reynolds@gapac.com'

Subject: PALATKA PULP and PAPER MILL; 1070005-066-AC

Sent by Microsoft Exchange Server 2007

Walker, Elizabeth (AIR)

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Thursday, March 10, 2011 4:28 PM
To: Walker, Elizabeth (AIR)
Cc: Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Please send us the Public Notice document in MS Word format.

Thank you,

Ron

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

From: Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]
Sent: Thursday, March 10, 2011 3:50 PM
To: Frost, Gary (Florida)
Cc: Reynolds, Ron E.; Mr. David A. Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; Abrams.Heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Bull, Robert
Subject: PALATKA PULP and PAPER MILL; 1070005-066-AC

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Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-066-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION/Natural Gas Burners at No. 4 Combination Boiler
Facility County: PUTNAM

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Elizabeth Walker

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)717-9093

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Walker, Elizabeth (AIR)

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Thursday, March 10, 2011 5:35 PM
To: Walker, Elizabeth (AIR)
Cc: Frost, Gary (Florida)
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

I am verifying access to all documents.

Thanks!

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

From: Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]
Sent: Thursday, March 10, 2011 3:50 PM
To: Frost, Gary (Florida)
Cc: Reynolds, Ron E.; Mr. David A. Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; Abrams.Heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Bull, Robert
Subject: PALATKA PULP and PAPER MILL; 1070005-066-AC

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Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
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Facility County: PUTNAM

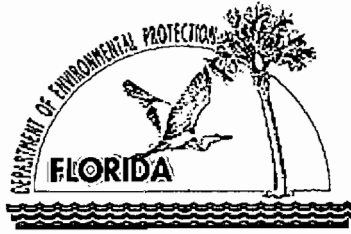
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**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

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

Palatka Mill
Facility ID No. 1070005

PROJECT

Project No. 1070005-066-AC
Application for Minor Source Air Construction Permit
Natural Gas Burners at No. 4 Combination Boiler
New Source Review Reform Project

COUNTY

Putnam County, Florida

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, Florida 32399-2400

Revised
March 31, 2011

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 Description and Location

The Palatka Mill is an existing Kraft pulp and paper mill, which is categorized under Standard Industrial Classification Code No. 2611. The existing Palatka Mill is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates of the existing facility are Zone 17, 434.00 km East and 3,283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate 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.

Project Description

On September 9, 2009 the Department issued permit No. 1070005-045-AC, PSD-FL-393 which allowed several modifications to the No. 4 combination boiler in two phases. Phase 1 included upgrades to the bark/wood delivery/storage, increased bark/wood firing rate, addition of an over-fire air system, new mechanical collectors to replace the existing pre-cleaner, bottom ash handling system, ductwork between the No. 4 Combination Boiler and No. 5 Power Boiler and ductwork to assist the over fire air system. Phase 2 included the conversion of the supplemental residual oil firing system for No. 4 Combination Boiler to natural gas and permanently discontinued use of residual oil. All of phase 1 work would be complete before phase 2 modifications would begin construction. The permittee did not start any of the modifications within 18 months of the permit issuance. The project was subject to PSD preconstruction review because of the increased bark feed rate and no work was done under this permit. As part of this permit application, the permittee requested PSD-FL-393 be surrendered (Part B, Page 4 of the application).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This new application contains three modifications originally permitted under permit No. 1070005-045-AC: 1) convert the supplemental residual oil burners for No. 4 Combination Boiler to natural gas burners and permanently discontinue use of residual oil; 2) replace 28 continuous tube sections in the boiler's superheater section; and 3) upgrades to the existing mechanical dust collection system and replacement of the existing steam turbine-driven induced draft fan with an electric motor to recover bark/wood firing capacity lost due to down time of the existing drive system.

Processing Schedule

January 10, 2011 Received the application for a minor source air pollution construction permit.
January 20, 2011 Conference call with the permittee. Additional information provided by the applicant.
February 9, 2011 Application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major

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stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than $1 \mu\text{g}/\text{m}^3$, 24-hour average.

If the potential emissions exceed the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

As provided in the application, the following table 1 summarizes potential emissions and PSD applicability for the project. The footnotes below discuss the methodology of determining the ‘could have accommodated’ bark/wood firing capacity of the unit. This information can also be found in Table 4-9 of the application.

Table 1- Summary of the Applicant’s PSD Applicability Analysis

Pollutant	Annual Emissions, Tons/Year					Subject to PSD?
	Baseline Actual	Demand Growth	Projected Actual	Increase	Significant Emissions Rate	
CO	817.65	46.55	932.50	68.30	100	No
NO _x	398.75	0	426.19	27.44	40	No
PM	139.12	0	140.08	0.96	25	No
PM ₁₀	108.39	0	110.96	2.57	15	No
PM _{2.5}	96.62	0	100.88	4.26	10	No
SO ₂	827.99	0	37.61	-790.38	40	No
SAM	36.82	0	1.67	-35.15	7	No
VOC	46.33	2.65	52.78	3.8	40	No
Pb	.01000	0	0.0076	-0.0024	0.6	No
Hg	0.0010	0	0.0009	-0.0001	0.1	No
F	0.084	0	0	-0.084	3	No

- Activity factors based on annual heat input rate that could have been accommodated during the baseline period due to bark burning (3,239,946 MMBtu/yr for 2002-2003; 3,501,937 MMBTU/yr for 2004-2005). Because the heat input rate that could have been accommodated due to bark burning is higher than the projected actual heat input rate, the heat input rate was reduced to the projected actual heat input rate (2,992,500 MMBtu/yr; see Table 4-7 of the application) minus the restored heat input rate (111,825 MMBtu/yr). The restored heat input rate is based on recovering 35 TPD of bark/wood burning capacity as a result of the dust collector and ID fan projects, and a total of 355 days/year operation.
 - o Restored Heat Input Rate: 35 TPD x 355 day/yr x 9 MMBtu/ton = 111,825 MMBtu/yr
 - o Could have accommodated: 2,992,500 MMBtu/yr – 111,825 MMBtu/yr = 2,880,675 MMBtu/yr

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. PM₁₀ and particulate matter with a mean particle diameter of 2.5 microns or less (PM_{2.5}) were calculated using emission factors from AP-42 for both filterable and condensable emissions. The application showed that most all of the PM emissions were from bark/wood firing and not the fuel oil to natural gas conversion, and the recovered bark/wood firing would not trigger significant emission rates.

Additionally, the applicant provided a preliminary greenhouse gas (GHG) emission review for this project. The review addressed both Steps 1 and 2 of the EPA’s tailoring rule. The significant emission rate for carbon dioxide equivalents (CO₂e) is 75,000 tons and the permittee is anticipating the overall GHG emissions would decrease due to the fossil fuel component of the boiler’s fuel supply. Therefore, PSD review and BACT determination for GHG emissions will not be required for this project.

3. DEPARTMENT REVIEW

The No. 4 combination boiler is currently in operation at the Palatka Mill and is currently permitted to burn wood/bark and residual fuel oil. The permittee proposes four modifications to the existing unit in this project. The permittee proposes to discontinue the use of fuel oil as a supplemental fuel and instead fire natural gas in its place, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric motor and replace 28 continuous tube sections in the boiler's superheater section.

The permittee will continue firing wood/bark as the primary fuel and fire natural gas as a supplemental fuel in lieu of fuel oil. The required annual heat input from natural gas will be the same as that of the fuel oil. The natural gas heat input rating for the burners is slightly higher than the fuel oil heat input rating (427 MMBtu/hr and 418 MMBtu/hr, respectively). Emissions from firing natural gas are not expected to exceed any significant emission rates and SO₂ and SAM emissions should decrease significantly.

The existing dust control system consists of three mechanical dust collectors followed by an electrostatic precipitator. The proposed upgrades to the existing mechanical dust collection system will modify the tertiary dust collector and convert the primary and secondary dust collectors to simple gas ducts. Modifications to the tertiary duct are expected to increase efficiency and reduce maintenance costs. Currently, the dust collection system is operating at 82% control. The vendor guarantees are 84% control so no increases in PM emissions are anticipated from this modification.

The permittee proposes to replace the existing steam-driven induced draft fan-drive with an electric fan motor and fan for increased efficiency and reduced maintenance. The flow rate for the proposed electric motor and ID fan will be the same as the existing fan and will result in the restoration of 35 tons/day of bark combustion within the boiler. The permittee excluded the restored bark rate when determining the 'could have accommodated' rate in its review of projected actual emissions, as it is related to the project. The applicant explains this concept in the footnotes provided in table 4-9 of the application as mentioned in the applicant analysis.

Finally, the permittee has determined that 28 continuous tube sections in the secondary superheater must be replaced in order to withstand the higher temperatures associated with burning natural gas. The work is considered routine maintenance by the permittee and was previously permitted by the Department under permit No. 1070005-038-AC, PSD-FL-380.

Project 1070005-045-AC, PSD-FL-393 was subject to PSD major review based on the revisions at Combination Boiler No. 4 including increased bark/wood firing rate. The applicant has since surrendered this permit and is no longer permitted to increase the bark/wood firing rate. The exclusion of the increase in bark/wood firing rate from this project will show a significant decrease in overall project emissions for this new application. The permittee submitted a revised PSD netting table to show that no changes in PSD applicability resulted in other previous projects as a result of surrendering the PSD permit.

The facility was also subject to Best Available Retrofit Technology (BART) review and the No. 4 combination boiler was analyzed for NO_x, SO₂, and PM emissions as part of the review. The permittee previously provided an air quality modeling analysis to demonstrate that this BART-eligible unit would not be subject to the BART requirements. This analysis remains valid.

The Department's review and analysis focused on actual increases due to the natural gas conversion and the recovered wood/bark firing with the installation of the proposed fan-drive replacement. In Table 2, the Department estimated the difference in emission by comparing the fuel oil baseline emission factors with the AP-42 emission factors for natural gas. As expected, the gas conversion provided large decreases in NO_x, PM/PM₁₀, SAM, SO₂, and VOC emissions. Emission factors provided by the applicant in Table 4.9 of the application were used to calculate projected actual emissions from the recovered bark/wood firing. The applicant estimated that the recovered heat input would be 111,825 MMBtu/year and potential emissions were calculated using the applicant's projected actual emission factors for each pollutant. As shown in the table 3 below, no pollutants were over the significant emission rates.

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Table 2- Department's Emissions Comparison Between Fuel Oil and Natural Gas

	Emission Factor Fuel Oil (lb/MMBtu)	Heat Input MMBtu/yr	TPY Fuel Oil change	Emission Factor Natural Gas (lb/MMBtu)	Heat Input MMBtu/yr	TPY Natural Gas Change	TPY Change From Gas Conversion
CO	0.033	695007	11.47	0.1	695007	34.75	23.28
NO_x	0.31	695007	108.77	0.15	695007	52.13	-56.64
PM	0.038	695007	13.21	0.0076	695007	2.64	-10.57
PM₁₀	0.024	695007	8.34	0.0076	695007	2.64	-5.70
PM_{2.5}	0.015	695007	5.21	0.0076	695007	2.64	-2.57
SO₂	2.36	695007	820.11	0.0006	695007	0.21	-819.90
SAM	0.11	695007	36.49	0.000027	695007	0.0093	-36.48
VOC	0.0019	695007	0.66	0.0055	695007	1.91	1.25
Pb	0.000010	695007	0.0035	0.00000050	695007	0.00017	-0.0033
Hg	0.00000075	695007	0.00026	0.00000026	695007	0.000091	-0.00017
F	0.00025	695007	0.087	0	695007	0	-0.087

Table 3- Department's PSD Applicability Analysis

Pollutant	Annual Emissions, Tons/Year				Subject to PSD?
	TPY Change from Gas Conversion	Recovered Bark/Wood Change	Total Project Change	Significant Emissions Rate	
CO	23.28	33.60	56.88	100	No
NO_x	-56.64	78.27	21.63	40	No
PM	-10.57	5.14	-5.43	25	No
PM₁₀	-5.70	4.03	-1.67	15	No
PM_{2.5}	-2.57	3.69	1.12	10	No
SO₂	-819.90	1.40	-818.5	40	No
SAM	-36.48	0.06	-36.42	7	No
VOC	1.25	1.9	3.15	40	No
Pb¹	-6.6 lb	0.6 lb	-6.0 lb	1,200 lb	No
Hg¹	-0.34 lb	0.07 lb	-0.27 lb	200 lb	No
F	-0.087	0	-0.087	3	No

1- Emissions are stated in pounds per year.

Table 4- Comparison of Applicant's and Department's PSD Applicability

Pollutant	Applicant Analysis TPY	Department Analysis TPY
CO	68.30	56.88
NO_x	27.44	21.23
PM	0.96	-5.42
PM₁₀	2.57	-1.67
PM_{2.5}	4.26	1.12
SO₂	-790.38	-818.5
SAM	-35.15	-36.42
VOC	3.8	3.15
Pb	-4.8 lb	-6.0 lb
Hg	-20 lb	-0.27 lb
F	-0.084	-0.087

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The projected actual emissions calculated by the Department are relatively consistent with those of the applicant, and all projected actual emissions are well below the significant emission rates (Table 4).

The project will not be subject to any new emission rates since most all of the emission rates are expected remain the same or decrease after the conversion. The applicant will be required to submit annual reports for five years to verify emissions have not exceeded the significant emission rates.

4. 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. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Bobby Bull is the project engineer responsible for reviewing the application and drafting the permit. 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.