P.E. CERTIFICATION STATEMENT

PERMITTEE

Georgia-Pacific Consumer Operations, LLC 215 County Road 216 Palatka, Florida 32178-0919

Draft Permit No. 1070005-072-AC Palatka Mill, No. 4 Recovery Boiler Tube Replacement Project Putnam County, Florida

PROJECT DESCRIPTION

On December 22, 2011, the Department received an application requesting authorization to replace the horizontally oriented floor, including tubes, on the No. 4 Recovery Boiler with an inclined floor including new, single-piece, corrosion-resistant tubes. There will be no increase in the boiler design black liquor solids input rate or steam capacity. The project will minimize the possibility of explosive contact between smelt (chemicals) recovered on the boiler floor and hot water/steam leaks.

The project will not cause significant emission increases. A review pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.) for the prevention of significant deterioration (PSD) and determinations of best available control technology (BACT) are not required. The No. 4 Recovery Boiler was subjected to a PSD review and BACT determinations in 2007 for a series of extensive and recently completed modifications. The unit will continue to operate within the BACT emission limits included in previous permit PSD-FL-380 (1070005-038-AC). The permit requires submittal of monitoring, reporting and recordkeeping on an annual basis for a period of 5 years to confirm that the project did not cause significant net emission increases in actual emissions.

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 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 distributed with the draft permit.

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).

A. A. Linero, P.E.

Registration Number 26

Florida Department of Environmental Protection

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