

**BOILER MACT SUBPART DDDDD
HEALTH-BASED COMPLIANCE
ALTERNATIVE DEMONSTRATION
FOR GEORGIA-PACIFIC CORPORATION**

*PALATKA MILL
PALATKA, FLORIDA*

**Prepared For:
Georgia-Pacific Corporation
P.O. Box 919
Palatka, Florida 32178-0919**

**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

September 2006

0637606



Palatka Pulp and Paper Operations
Consumer Products Division

P.O. Box 919
Palatka, FL 32178-0919
25-2001

Post-it® Fax Note	7671	Date	1/24/07	# of pages	5
To	Cindy Phillips	From	Leslie Maybin		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			

RECEIVED

JAN 23 2007

NORTHEAST DISTRICT
DEP-JACKSONVILLE

Mr. Christopher Kirts
District Air Program Administrator
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-8590

RECEIVED

JAN 31 2007

BUREAU OF AIR REGULATION

Dear Mr. Kirts:

Georgia Pacific Consumer Products LLC
AIRS ID Number 1070005-39-AV
Request for Additional Information

Georgia-Pacific Consumer Products LLC appreciates your prompt attention to our submission of its application for a Health Based Compliance Alternative (HBCA) exemption for manganese under 40 CFR Part 63 Subpart DDDDD (or the Boiler MACT). This letter responds to your Request for Additional Information dated November 9, 2006. Each of your points is addressed in the following paragraphs.

Request 1 – In Figure 5-1, indicate the sensitive receptors (for example, school, daycare, senior center, hospital).

Response: The data in Table 6.1 from the modeling demonstration, *Health-Based Compliance Alternative Demonstration for the GP Palatka Paper Manufacturing Facility in Palatka, FL*, show the UTM location of the manganese concentration for 2001 through 2005 modeled at the point on the property boundary where this maximum manganese concentration occurs. Georgia Pacific thereby demonstrated that it met the risk criteria of 0.05 micrograms per cubic meter for potential manganese emissions at its property boundary. Consequently, it was not necessary to consider the manganese concentrations at more distant off-site receptors such as schools, daycares, senior centers, or hospitals where concentrations will be even more reduced. It is therefore not necessary to show these sensitive receptors in Figure 5-1.

Request 2 – Please state how the mill intends to demonstrate continuous compliance with the proposed emission rates of 8.31 lb/hr and 0.039 lb/hr for the No. 4 Combination Boiler and the No. 5 Power Boiler, respectively.

Response: The requested emission limits of 8.31 lb/hr and 0.039 lb/hr for the No. 4 Combination Boiler and the No. 5 Power Boiler, respectively, were qualified as annual averages, not short-term averages (see Section 7.0 in the *Modeling Report for HBCA Demonstration*). Table 7-1, last column, clarified that the values were annual averages. To avoid further confusion, however, Section 7.0 in the *Modeling Report for HBCA Demonstration* and the application (attached) have been modified to request annual limits for Manganese instead of presenting them as “hourly limits based on an annual average”.

As allowed in the Boiler MACT, the manganese emission rate in pounds per million BTU was based on analysis of four samples of solid fuel (wood) burned in the No. 4 Combination Boiler and one liquid fuel sample of (#6 fuel oil) burned in the No. 5 Power Boiler. The Palatka Operations calculated the proposed lb/hr emission rates using the full rated capacity of the boilers rather than normal combustion rates. It also chose to add another layer of conservatism to the proposed final mass emission rate used in the modeling demonstration to account for the possible variability in these fuels by applying an adjustment factor of five to the resultant emission rate. With these layers of conservatism, the Mill does not believe that any fuel test result that would show emission rates in excess of the proposed emission rate limits.

However, the Palatka Operations recognizes that there needs to be some positive method of demonstrating compliance and proposes the following:

- The Mill will annually collect three daily composite samples of wood burned in the No. 4 Combination Boiler and liquid fuel (#6 fuel oil) burned in the No. 5 Power Boiler and analyzed for manganese content (in pounds per million BTU) according to the Site Specific Fuel Analysis Plan.
- The resultant average manganese concentration will be multiplied by the total annual heat input (million BTU) of the respective boilers to determine the emission rate in tons per year.
- This resultant emission rate will be compared with the respective proposed allowable emission rates.

Request 3 – Confirm stack diameters on No. 4 Combination Boiler and No. 5 Power Boiler.

Response: Georgia-Pacific cannot determine the source of the “historical data” indicating that the stack diameters are 7.1 feet and 9 feet, respectively. We have confirmed, using stack testing information that the stack diameters for both units are 8 feet.

Request 4 – Provide new Responsible Official certification.

Response: Requested DEP Form NO. 62-210.900(1) certification is attached.

Request 5 – Provide new Professional Engineer certification.

Response: Requested DEP Form NO. 62-210.900(1) certification is attached

If you have any further questions, please contact Mike Curtis at (386) 329-0918

Sincerely,



Keith Wahoske
Vice President

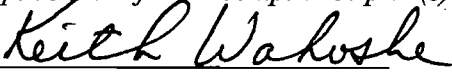
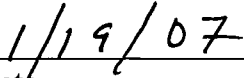
Attachment

cc: W. Galler, T. Champion, T. Wyles, S. Matchett, M. Curtis - GP

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/ revised/ renewal Title V permit or concurrent processing of an air construction permit and a revised/ renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Georgia-Pacific Consumer Products LLC Street Address: 215 County Road 216 City: Palatka State: FL Zip Code: 32177
4. Application Responsible Official Telephone Numbers... Telephone: (386) 329-0063 - ext. 5963 Fax: (386) 328-0014
5. Application Responsible Official Email Address: Keith.Wahoske@gapac.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>David A. Buff</i> _____ Signature _____ Date <i>1/18/07</i> (seal)

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670

** Transmit Conf. Report **

P. 1

Jan 24 2007 10:48

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Palatka Pulp and Paper Operations
Consumer Products Division

Fax 919

FL 32178-0919
25-2001

Post-It* Fax Note	7571	Date	1/24/07	# of pages	5
To	Cindy Phillips	From	Leslie Nash		
Co./Dept.		Co.			
Phone #		Phone #			
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AIRS ID Number 1070005-39-AV
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Table 1-1, Summary of Air Pollutant Standards and Terms

Georgia-Pacific Corporation

PROPOSED Permit Renewal No.: 1070005-031-AV

Palatka Mill

Facility ID No.: 1070005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

14 #4 Power Boiler (REMOVED)

Pollutant Name	Fuel(s)	Hrs/Yr	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	Permit Cond(s)
			Standard(s)	lbs/hr	TPY	lbs./hour	TPY		

Note:

* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10700051.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV						
Palatka Mill			Facility ID No.:1070005						
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description								
15	#5 Power Boiler								
Pollutant Name	Fuel(s)	Hrs/Yr	Allowable Emissions			Equivalent Emissions		Regulatory Citation(s)	Permit Cond(s)
			Standard(s)	lbs/hr	TPY	lbs/hour	TPY		
PM (steady-state)	Fuel Oil	8760	0.1 lb/MMBTU	56.89	249.18			62-296.405(1)(b), F.A.C.	III.B.4.
PM (soot blowing)	Fuel Oil		0.3 lb/MMBTU	170.67				62-210.700(3), F.A.C.	III.B.5.
Sulfur Dioxide	Fuel Oil	8760	2.35% Sulfur Content	1461.7	6404.2			1070005-017-AC/PSD-FL-264	III.B.6.
VE (steady state)	Fuel Oil	8760	20% opacity except 40/2					62-296.405(1)(a), F.A.C.	III.B.7.
VE (soot blowing)	Fuel Oil		60% opacity for 3hrs/24 hrs					62-210.700(3), F.A.C.	III.B.8.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
[electronic file name: 10700051.xls]									

Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV						
Palatka Mill			Facility ID No.: 1070005						
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description								
16	#4 Combination Boiler								
Pollutant Name	Fuel(s)	Hrs/Yr	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	Permit Cond(s)
			Standard(s)	lbs/hr	TPY	lbs./hour	TPY		
Particulate Matter	Carb. Fuel	8760	0.3 lb/MMBtu	125.6	550.1			62-296.410(1)(b)2.	III. C.4.
Particulate Matter	#6 Fuel	8760	0.1 lb/MMBtu	41.9	183.5			62-296.410(1)(b)2.	III. C.4.
Sulfur Dioxide	#6, NCG, SOG	8760	2.35% Sulfur Content	1701.9**	5259.5**			1070005-017-AC/PSD-	III. C.5.a.
Sulfur Dioxide	NCG/SOG	8760		626.4	548.7			1070005-017-AC/PSD-	III. C.5.a.
Total Reduced Sulfur	Any of the permitted fuels	8760	5 ppmvd @ 10% O2	0.54	0.47			62-296.404(3)(f)1., F.A.C.	III. C.6.
Visible Emissions	Carb./Fuel Oil	8760	30% opacity except 40% 2 min/hr					62-296.410(1)(b)1., F.A.C.	III. C.7.a.
Visible Emissions	#6 Fuel	8760	20% Opacity except 40% 2 min/hr					AC54-163040	III. C.7.b.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
** Includes the SO2 due to NCG/SOG destruction (626.4 lb/hr and 548.7 TPY)									
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Table 1-1, Summary of Air Pollutant Standards and Terms							
Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV				
Palatka Mill			Facility ID No.:1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.		Brief Description					
17		# 4 Lime Kiln					
Allowable Emissions							
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	Regulatory Citation(s)	Permit Cond(s)
Particulate Matter	Fuel Oil	8760	0.081 gr/dscf @ 10% O2	26.0	113.9	BACT; AC54-192551	III.D.4.
Particulate Matter Bubble Limit **	Fuel Oil	8760	1.217 lb PM/Ton-BLS			40 CFR 63.862(a)(1)(ii)(A)	III.D.4.
Total Reduced Sulfur	Fuel Oil	8760	20 ppmvd @ 10% O2 as 12	4.0	17.5	62-296.404(3)(e)1.	III.D.5.
Visible Emissions	Fuel Oil	8760	20% Opacity (moisture interference)			BACT; AC54-192551	III.D.6.
Sulfur Dioxide	Fuel Oil	8760	0.3 lb/ton (ADUP);50% eff.	10.9	47.7	BACT; AC54-192551	III.D.7.
Nitrogen Oxides	Fuel Oil	8760	290 ppmvd @ 10% O2	50.3	223.3	BACT; AC54-192551	III.D.8.
Carbon Monoxide	Fuel Oil	8760	69 ppmvd @ 10% O2	7.3	32.0	BACT; AC54-192551	III.D.9.
Volatile Organic Cpds	Fuel Oil	8760	185 ppmvd @ 10% O2	17.2	75.3	BACT; AC54-192551	III.D.10.
Notes:							
* The "Equivalent Emissions" listed are for informational purposes only.							
** Alternant PM Limit established using a bubble over EU017 (Lime Kiln), EU018 (#4 Recovery Boiler) and EU019 (Smelt Dissolving Tanks).							
[electronic file name: 10700051.xls]							

Table 1-1, Summary of Air Pollutant Standards and Terms							
Georgia-Pacific Corporation		PROPOSED Permit Renewal No.: 1070005-031-AV					
Palatka Mill		Facility ID No.:1070005					
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
18	#4 Recovery Boiler						
			Allowable Emissions				
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	Regulatory Citation(s)	Permit Cond(s)
Particulate Matter	BLS/Oil	8760	0.030 gr/dscf @ 8% O2	75.6	331.1	BACT; AC54-266676	III.E.4.
Particulate Matter Bubble Limit **	BLS/Oil	8760	1.217 lb PM/ Ton-BLS			40 CFR 63.862(a)(1)(ii)(A)	III.E.4.
Total Reduced Sulfur	BLS/Oil	8760	7.0 ppmvd @ 8% O2 as 12-mo. rolling avg	10.9	47.7	BACT; AC54-266676	III.E.5.
Total Reduced Sulfur	BLS/Oil	8760	11.2 ppmvd @8% O2 as 12-hr block avg.	17.5		BACT; AC54-266676	III.E.5.
Visible Emissions	BLS/Oil	8760	20% Opacity			BACT; AC54-266676	III.E.6.
Sulfur Dioxide	BLS/Oil	8760	75 ppmvd @ 8% O2	109.9	481.4	BACT; AC54-266676	III.E.7.
Nitrogen Oxides	BLS/Oil	8760	80 ppmvd @ 8% O2	168.5	738.1	BACT; AC54-266676	III.E.8.
Carbon Monoxide	BLS/Oil	8760	3-hr block avg.; 800 ppmvd @ 8% O2	1,025.4		BACT; AC54-266676	III.E.9.
Carbon Monoxide	BLS/Oil	8760	24-hr; 400 ppmvd @ 8% O2	512.7	2,245.6	BACT; AC54-266676	III.E.9.
Volatile Organic Cpds	BLS/Oil	8760	0.30 lb/ton BLS	31.5	138.0	BACT; AC54-266676	III.E.10.
Sulfuric Acid Mist	BLS/Oil	8760	0.81 ppmvd	3.2	14.2	BACT; AC54-266676	III.E.11.
Beryllium	BLS/Oil	8760	0.5 lb/E+12 BTU	0.0006	0.0028	BACT; AC54-266676	III.E.12.
Notes:							
* The "Equivalent Emissions" listed are for informational purposes only.							
** Alternant PM Limit established using a bubble over EU017 (Lime Kiln), EU018 (#4 Recovery Boiler) and EU019 (Smelt Dissolving Tanks).							
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Table 1-1, Summary of Air Pollutant Standards and Terms							
Georgia-Pacific Corporation		PROPOSED Permit Renewal No.: 1070005-031-AV					
Palatka Mill		Facility ID No.:1070005					
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
19	#4 Smelt Dissolving tanks (2)						
Allowable Emissions							
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	Regulatory Citation(s)	Permit Cond(s)
Particulate Matter		8760	0.12 lb/ton BLS	12.6	55.2	BACT; AC54-193841	III.F.3.
Particulate Matter Bubble Limit **		8760	1.217 lb PM/ Ton-BLS			40 CFR 63.862(a)(1)(ii)(A)	IIIF.3.
Total Reduced Sulfur		8760	48 lb TRS/3000 lbs BLS as H	3.4	14.9	62-296.404(3)(d)1.,FAC	III.F.4.
Visible Emissions		8760	<20% opacity (moisture interference)			62-296.404(2)(b),FAC	III.F.5.
Notes:							
* The "Equivalent Emissions" listed are for informational purposes only.							
** Alternant PM Limit established using a bubble over EU017 (Lime Kiln), EU018 (#4 Recovery Boiler) and EU019 (Smelt Dissolving Tanks).							
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Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation		PROPOSED Permit Renewal No.: 1070005-031-AV							
Palatka Mill		Facility ID No.:1070005							
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description								
31	Tall Oil Plant								
	Allowable Emissions					Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lbs/hour	TPY	Regulatory Citation(s)	Permit Cond(s)
Total Reduced Sulfur		8760	0.031 lb TRS/ton Tall Oil as 12-hr avg	0.14	0.5			62-296.404(3)(b)1., F.A.	Ill.G.3.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
[electronic file name: 10700051.xls]									

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Georgia-Pacific Corporation		PROPOSED Permit Renewal No.: 1070005-031-AV							
Palatka Mill		Facility ID No.: 1070005							
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E.U. ID No.	Brief Description								
32	Noncondensable Gas System (REMOVED)								
[electronic file name: 10700051.xls]									

Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation					PROPOSED Permit Renewal No.: 1070005-031-AV				
Palatka Mill					Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description								
34	#6 Boiler (REMOVED)								
	Allowable Emissions				Equivalent Emissions				
[electronic file name: 10700051.xls]									

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Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV						
Palatka Mill			Facility ID No.:1070005						
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E.U. ID No.	Brief Description								
35	C1O2 Plant and Methanol Tank								
			Allowable Emissions			Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lbs/hour	TPY	Regulatory Citation(s)	Permit Cond(s)
Tank Dimensions		8760						40 CFR 60.116(a) and (b),	III.J.3.
Notes:									
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Palatka Mill		Facility ID No.:1070005							
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E.U. ID No.		Brief Description							
036		Elemental Chlorine Free No. 3 Bleach Plant							
		Allowable Emissions				Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lbs./hour	TPY	Regulatory Citation(s)	Permit Cond(s)
Carbon Monoxide		8760		100.0	324.0			62-212.410, F.A.C	III.K.6.
Total Chlorinated HAPs		8760	< 10 ppmv					63.445(c)(2);	III.K.7.
Visible Emissions		8760	< 20% Opacity					62-296.320, F.A.C.; Rule 62-296.404(2)(b), F.A.C	III.K.8.
Notes:									
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Georgia-Pacific Corporation		PROPOSED Permit Renewal No.: 1070005-031-AV							
Palatka Mill		Facility ID No.:1070005							
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description								
044	No.7 Package Boiler								
			Allowable Emissions			Equivalent Emissions			
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lbs/year	TPY	Regulatory Citation(s)	Permit Cond(s)
Nitrogen Oxides		8760	0.2 lb/MMBtu	48.9	39.4			40 CFR 60.44b(a)(1)(ii); 40 CFR 60.44b(h); 40 CFR 60.44b(i); 40 CFR 60.44b(l)(1);	III.L.5.
Visible Emissions		8760	< 20% Opacity except for 27% for up to 6/hr					Rule 62-296.406(1), F.A.C	III.L.7.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
[electronic file name: 10700051.xls]									

Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV						
Palatka Mill			Facility ID No.:1070005						
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.	Brief Description		Allowable Emissions			Equivalent Emissions		Regulatory Citation(s)	Permit Cond(s)
037	Thermal Oxidizer		Standard(s)	lbs/hr	TPY	lbs./hour	TPY		
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lbs./hour	TPY	Regulatory Citation(s)	Permit Cond(s)
TRS		8760	5 ppmv correct 10% O ₂ , 12 hr avg.	0.2	0.89			62-296.404(3)(f)1., F.A.C	III.N.5.
Visible Emissions		8760	< 20% Opacity						III.N.7.
Sulfur Dioxide		8760		31.3	137.2				III.N.6.
Total HAP Reduction		8760	<= 20 ppmvd correct ed to 10% O ₂ Methanol					40 CFR 63.443(d)(2);	III.N.8.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
[electronic file name: 10700051.xls]									

Table 1-1, Summary of Air Pollutant Standards and Terms									
Georgia-Pacific Corporation			PROPOSED Permit Renewal No.: 1070005-031-AV						
Palatka Mill			Facility ID No.:1070005						
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.									
E.U. ID No.		Brief Description							
046		Condensate Collection and Steam Stripper							
			Allowable Emissions			Equivalent Emissions			
Pollutant Name	Fuel(s)	Hrs/Yr	Standard(s)	lbs/hr	TPY	lb./hour	TPY	Regulatory Citation(s)	Permit Cond(s)
HAP Collection		8760	Collect 7.2 lb/ton ODUBP and 11.1 lb/ton ODBP; prorated and based on 15-day average					40 CFR 63.446(c)(3)	III.O.5.
Total HAP Treatment		8760	Reduce or destroy the total HAPs by at least 92 percent or more by weight					40 CFR 63.446(e)(3)	III.O.9.
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									
[electronic file name: 10700051.xls]									

Table 1-1, Summary of Air Pollutant Standards and Terms

Georgia-Pacific Corporation
Palatka Mill

PROPOSED Permit Renewal No.: 1070005-031-AV

Facility ID No.:1070005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
050	Converting Department

Pollutant Name	Fuel(s)	Hrs/Yr	Allowable Emissions			Regulatory Citation(s)	Permit Cond(s)
			Standard(s)	lbs/hr	TPY		
Organic HAP		8760	No greater than 4% of the mass of coating materials applied for each month.			40 CFR 63.3320(b)(2)	III.Y.1.

Notes:

* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10700051.xls]

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation		PROPOSED Permit Revision No.: 1070005-031-AV					
Palatka Mill		Facility ID No.: 1070005					
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
14	#4 Power Boiler		REMOVED				
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED DRAFT Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
15	#5 Power Boiler						
			Testing	Frequency	Min. Compliance		
Pollutant Name		Compliance	Time	Base	Test		
or Parameter	Fuel(s)	Method	Frequency	Date *	Duration	CMS**	See permit condition(s)
PM (S-S)	Fuel Oil	EPA 5	Annually	FFY			III.B.9.
PM (SB)	Fuel Oil	EPA 5	Annually	FFY			III.B.10.
Sulfur Dioxide	Fuel Oil	Recordkeeping	Annually	1-Mar			III.B.11.
VE (S-S)	Fuel Oil	DEP 9	Annually	FFY			III.B.12.
VE (SB)	Fuel Oil	DEP 9	Annually	FFY			III.B.13.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
16	#4 Combination Boiler						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Particulate Matter	Fuel Oil	EPA 5	Annually	FFY			III.C.8.
Sulfur Dioxide	Fuel Oil	Recordkeeping	Annually	1-Apr			III.C.19.
Visible Emissions	Fuel Oil	DEP 9	Annually	FFY			III.C.7.b., and C.13.
Visible Emissions	Fuel Oil & Carb.	DEP 9	Annually	FFY			III.C.7.a., and C.13.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation			PROPOSED Permit Revision No.: 1070005-031-AV				
Palatka Mill			Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
17	#4 Lime Kiln						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing	Frequency	Min. Compliance		
			Time	Base	Test		
			Frequency	Date *	Duration	CMS**	See permit condition(s)
Particulate Matter	Fuel Oil	EPA 5	Annually	FFY			III.D.11.
Total Reduced Sulfur	Fuel Oil	EPA 16 or 16A	Annually	FFY		Yes	III.D.12.
Visible Emissions	Fuel Oil	see SC D.6.					III.D.13.
Sulfur Dioxide	Fuel Oil	EPA 8	Annually	FFY			III.D.14.
Nitrogen Oxides	Fuel Oil	EPA 7E	Annually	FFY			III.D.15.
Carbon Monoxide	Fuel Oil	EPA 10	Annually	FFY			III.D.16.
Volatile Organic Cpds	Fuel Oil	EPA 25A	Annually	FFY			III.D.17.
Scrubber Liquid Flow Rate			3-hr block average			Yes	III.D.21.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation			PROPOSED Permit Revision No.: 1070005-031-AV				
Palatka Mill			Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
18	#4 Recovery Boiler						
			Testing	Frequency	Min. Compliance		
Pollutant Name		Compliance	Time	Base	Test		
or Parameter	Fuel(s)	Method	Frequency	Date *	Duration	CMS**	See permit condition(s)
Particulate Matter	BLS	EPA 5	Annually	FFY			III.E.13.
Visible Emissions	BLS	EPA 9	Annually	FFY			III.E.14.
Sulfur Dioxide	BLS	EPA 6C	Annually	FFY			III.E.15.
Nitrogen Oxides	BLS	EPA 7E	Annually	FFY			III.E.16.
Carbon Monoxide	BLS	EPA 10	Annually	FFY			III.E.17.
Volatile Organic Cpds	BLS	EPA 25A	Annually	FFY			III.E.18.
Total Reduced Sulfur	BLS	EPA 16 or 16A	Annually	FFY			III.E.19.
Sulfuric Acid Mist	BLS	EPA 8 or NCASI 106	Annually	FFY			III.E.20.
Beryllium	BLS	EPA 104	5 years	FFY			III.E.21.
Total Reduced Sulfur	BLS					Yes	III.E.5.,22.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
19	#4 Smelt Dissolving Tanks (2)						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing	Frequency	Min. Compliance		
			Time	Base	Test		
			Frequency	Date *	Duration	CMS**	See permit condition(s)
Particulate Matter		EPA 5	Annually	FFY			III.F.6.
Visible Emissions		see SC F.5.					III.F.7. & F.5.
Total Reduced Sulfur		EPA 16 or 16A	Annually	FFY			III.F.8.
Weak Wash Flow Rate to the Scrubber			12-hr block average			yes	III.F.9.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
31	Tall Oil Plant						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Total Reduced Sulfur		EPA 16 or 16A	Every 5 years	FFY			III.G.4., G.5.
Scrubber ringheader inlet flow rate			Average during entire cook			yes	III.G.6.
Scrubber makeup flow rate			Average during entire cook			yes	III.G.6.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements								
Georgia-Pacific Corporation			PROPOSED Permit Revision No.: 1070005-031-AV					
Palatka Mill			Facility ID No.: 1070005					
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.								
E.U. ID No.								
Brief Description								
32			Noncondensable Gas (NCG) System (REMOVED)					
			Testing		Frequency		Min. Compliance	
Pollutant Name			Compliance		Time		Base	
or Parameter			Fuel(s)		Method		Date *	
			Frequency		Duration		CMS**	
							See permit condition(s)	
Notes:								
[electronic file name: 10700052.xls]								

Table 2-1, Summary of Compliance Requirements								
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV				
Palatka Mill				Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.								
E.U. ID No.	Brief Description							
34	#6 Boiler (REMOVED)							
			Testing	Frequency	Min. Compliance			
Pollutant Name		Compliance	Time	Base	Test			
or Parameter	Fuel(s)	Method	Frequency	Date *	Duration	CMS**	See permit condition(s)	
Notes:								
[electronic file name: 10700052.xls]								

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation			PROPOSED Permit Revision No.: 1070005-031-AV				
Palatka Mill			Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
35	ClO2 Plant and Methanol Tank						
			Testing	Frequency	Min. Compliance		
Pollutant Name		Compliance	Time	Base	Test		
or Parameter	Fuel(s)	Method	Frequency	Date *	Duration	CMS**	See permit condition(s)
Tank Dimensions		Recordkeeping	Annually				III.J.3.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
036	Elemental Chlorine Free No. 3 Bleach Plant						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Carbon Monoxide		EPA Method 10	Annually	FFY			III.K.13.
Total Chlorinated HAPs		EPA Method 26A	Annually	FFY			III.K.14.
Visible Emissions		EPA Method 9	Annually	FFY			III.K.15.
Fan Amperage of Bleaching System Vent Gas Fan						Yes	III.K.21.
Scrubber Medium effluent pH or oxidation reduction potential						Yes	III.K.21.
Scrubber Liquid Inlet Flow Rate						Yes	III.K.21.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation			PROPOSED Permit Revision No.: 1070005-031-AV				
Palatka Mill			Facility ID No.: 1070005				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
044	No. 7 Package Boiler						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Nitrogen Oxides	Natural Gas	EPA Method 7 or 7A	Annually	backup		Y	III.L.15.
Visible Emissions	Natural Gas	EPA Method 9	Fed Fisc. Year		60 minutes		III.L.10.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements							
Georgia-Pacific Corporation				PROPOSED Permit Revision No.: 1070005-031-AV			
Palatka Mill				Facility ID No.: 1070005			
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.							
E.U. ID No.	Brief Description						
037	Thermal Oxidizer						
			Testing	Frequency	Min. Compliance		
Pollutant Name		Compliance	Time	Base	Test		
or Parameter	Fuel(s)	Method	Frequency	Date *	Duration	CMS**	See permit condition(s)
TRS	NCG/SOG	Min Temp 1200F & 0.5-sec Res. Time		N/A			III.N.8.
Sulfur Dioxide	NCG/SOG	EPA Method 6C	Annually	FFY			III.N.9.
Visible Emissions	NCG/SOG	EPA Method 9	Annually	FFY			III.N.10.
Methanol Concentration		EPA Method 308	Annually	FFY			III.N.12.
Batch Pre-Scrubber Liquid Flow rate						YES	III.N.15.
Continuous Pre-Scrubber Liquid Flow Rate						YES	III.N.16.
Temperature at the back end of the first pass						YES	III.N.19.
SO2 Post-Scrubber flow Rate						YES	III.N.18.
SO2 Post-Scrubber Medium Effluent pH						YES	III.N.18.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements

Georgia-Pacific Corporation
Palatka Mill

PROPOSED Permit Revision No.: 1070005-031-AV
Facility ID No.: 1070005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.		Brief Description					
046		Condensate Steam Stripper					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing	Frequency	Min. Compliance		
			Time Frequency	Base Date *	Test Duration	CMS**	See permit condition(s)
Total HAP		Inspections, Methanol Concentration Factors,	Annually	FFY			III.O.11.; O.15.;O.16.
Condensate Collection		7.2. Lbs/ton ODUP and 11.1 lbs/ton of ODBP; prorated on 15-day average reduce or destroy					III.O.4.; O.5.
Condensate Treatment		the total HAPs by at least 92 percent or more by weight; time of excess emissions not to exceed 10%					III.O.9.; III.O.3-10
Stripper steam-to- condensate ratio						Yes	III.O.11.
Condensate Feed Temperature						Yes	III.O.11.
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS (=) continuous monitoring system							
[electronic file name: 10700052.xls]							

Table 2-1, Summary of Compliance Requirements

Georgia-Pacific Corporation
Palatka Mill

Facility ID No.: 1070005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit

E.U. ID No. Brief Description

50 Converting Department

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Test Duration	Min. Compliance	
				CMS**	See permit condition(s)
Organic HAPs		Recordkeeping			III.Y.4.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

[electronic file name: 10700052.xls]

ARMINV50

POINT AIRS ID 1070005 STATUS A OFFICE NED NE: JACKSONVILLE
 SITE NAME GEORGIA-PACIFIC CORP. PULP/PAPER MILL COUNTY PUTNAM
 OWNER/COMP GEORGIA-PACIFIC CORP. PULP/PAPER MILL

EU ID *	Stat	Description
014	A	No. 4 Power Boiler
015	A	No. 5 Power Boiler
016	A	No. 4 Combination Boiler
017	A	#4 LIME KILN W/ HIGH ENERGY ZURN VENTURI SCRUBBER;u-oil. A
018	A	#4 RB (REC*Y BLR) W/ESP & LOW ODOR DESIGN;u-oil. A
019	A	#4 SDTS (SMELT DISSOLVING TANKS); 2 TANKS, EACH W/ A SCRUBBER
031	A	TALL OIL PLANT W/SCRUBBER
035	A	CHLORINE DIOXIDE PLANT AND METHANOL STORAGE
036	A	NEW ELEMENTAL CHLORINE-FREE BLEACH PLANT
037	A	THERMAL OXIDIZER
038	A	FACILITY-WIDE FUGITIVE EMISSIONS
039	A	New Bark Hog and the Existing Bark/Wood Chip Handling System
040	A	BROWN STOCK WASHING - EXISTING
041	A	PULPING AREA GENERAL
042	A	CHEMICAL RECOVERY AREA
043	A	DRYING/CONVERTING/WAREHOUSING
044	A	NO 7 PACKAGE BOILER REPLACING UNIT 034
045	A	WIDE WEB FLEXOGRAPHIC PRINTERS
046	A	Condensate Stripper System
049	A	CHIP MILL
047	C	BROWN STOCK WASHING SYSTEM (3 LINES - NOS. 5,6,7)
048	C	OXYGEN DELIGNIFICATION SYSTEM
020	I	NOT CONSTR #5 CNB BLR FRD W-BARK & OR PEAT W/ESP;2.5% S FO P
021	I	NOT CONSTR #5 REC BLR CONTR BY ESP & LOW ODOR DESIGN
022	I	NOT CONSTR #5 SMELT TANKS(2);EACH CONTROLLED BY A WET SCRUBB
023	I	NOT CONSTR #5 LIME KLN APC HIGH ENERGY VENTURI SCRUB;2.5% S
024	I	INACTIVE #1 DIGESTING ACCUMULATOR TANK TRS TO INCIN SRC 32
025	I	INACTIVE #2 DIGESTING ACCUMULATOR TANK TRS TO INCIN SRC 32
026	I	INACTIVE #1 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
027	I	INACTIVE #2 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
028	I	INACTIVE #3 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
029	I	INACTIVE #4 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
030	I	INACTIVE TURPENTINE CONDENSER TRS TO INCIN SRC 32
023	I	NOT CONSTR #5 LIME KLN APC HIGH ENERGY VENTURI SCRUB;2.5% S
024	I	INACTIVE #1 DIGESTING ACCUMULATOR TANK TRS TO INCIN SRC 32
025	I	INACTIVE #2 DIGESTING ACCUMULATOR TANK TRS TO INCIN SRC 32
026	I	INACTIVE #1 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
027	I	INACTIVE #2 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
028	I	INACTIVE #3 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
029	I	INACTIVE #4 BLACK LIQUOR EVAPORATOR TRS TO INCIN SRC 32
030	I	INACTIVE TURPENTINE CONDENSER TRS TO INCIN SRC 32
032	I	TRS INCINERATOR NCG FROM SRC'S 24-30,& 33 (DAT,BLE,TURP COND
033	I	INACTIVE CONDENSATE STRIPPER SYSTEM TRS TO INCIN SRC 32
034	I	#6 Boiler

GP Palatka

1070005

Air Resource Management System - Emission Point

EUI ID: 014 No. 4 Power Boiler ST: A

Type: SINGLE POINT SERVING A SINGLE EMISSIONS UNIT Stack No: 014

Identification: _____

Discharge Type: _____

Water Vapor %: _____ GEP Height: _____ Ft Exit Temperature: 395 F

Flow Rate: 36000 acfm Stack Height: 122 Ft Exit Diameter: 4.00 Ft

Dry Std Flow: _____ dscfm Non Stack Ht: _____ Ft Exit Velocity: 47.0 Ft/Sec

UTM Zone: East _____ North: _____ Latitude: _____ Longitude: _____

DEP Comment: _____

37.18 m

1.22

14.33 m/sec

Air Resource Management System - Emission Point

EU ID: **016** **No. 5 Power Boiler** ST: **A**

Type: **SINGLE POINT SERVING A SINGLE EMISSIONS UNIT** Stack No.: **015**

Identification: _____
 Discharge Type: _____

Water Vapor %: _____ GEP Height: _____ Ft Exit Temperature: **446** F
 Flow Rate: **230000** acfm Stack Height: **237** Ft Exit Diameter: **9.00** Ft
 Dry Std Flow: _____ dscfm Non Stack Ht: _____ Ft Exit Velocity: **60.3** Ft/Sec

UTM Zone: East North Latitude: _____ Longitude: _____

DEP Comment: _____

72.23 m

d. 2.74 m
 $r = 1.37$ m
 $\pi r^2 = 5.89$ m² 10.38 m/s