



Palatka Pulp and Paper Operations
Consumer Products Division

P.O. Box 919
Palatka, FL 32178-0919
(386) 325-2001

November 5, 2010

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**BUREAU OF
AIR REGULATION**

Mr. Jeffery F. Koerner, Air Permitting North Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Re: Georgia-Pacific Consumer Operations LLC
Palatka, Florida Mill-Facility ID No. 1070005
Installation of Advanced Control Software for No. 4 Combination Boiler**
File - 1070005 - ale5-AC

Dear Mr. Koerner:

Georgia-Pacific Consumer Operations LLC (GP) owns and operates an unbleached Kraft linerboard mill in Palatka, Putnam County, Florida (Palatka Mill), which operates under Title V Air Operating Permit No. 1070005-064-AV. The Palatka Mill is proposing to replace existing obsolete boiler controls with a new advanced control computer software package for the No. 4 Combination Boiler (EU ID 016) to improve energy management and reduce fossil fuel consumption in the boiler.

The No. 4 Combination Boiler currently burns a combination of bark and No. 6 fuel oil to generate steam for process operations and to make electricity using a turbine generator. The fuel oil is necessary to stabilize the combustion process and to provide steam at those times when there is an interruption in the delivery of bark to the boiler. As part of this project, the mill is also planning to upgrade five existing boiler air control damper actuators located in the ductwork supplying combustion air to the boiler from pneumatic to motorized controllers. The motorized controllers will be more precise and will provide feedback to the control system, which is vital to optimizing the boiler's performance and efficiency allowing for a reduction in its reliance on No. 6 fuel oil.

There will be no physical changes made to the boiler or to the combustion control and fuel feed systems. There will be no change in boiler capacity or in the fuels burned, and no fuels will be combusted in amounts exceeding current permit limits. Georgia-Pacific has concluded that, since this initiative requires no physical changes to be made to the boiler, and, as we believe, no change in the method of operation of the boiler, it requires no further analysis for New Source Review (NSR) or other air permitting requirements. This letter provides additional detail for the proposed work. Again, the goal of the project is to reduce fossil fuel consumption, thereby reducing emissions and energy costs.

Combination Boiler Advanced Control Software

The advanced control software is designed to minimize the use of fuel oil for steam generation and maximize the use of bark in the No. 4 Combination Boiler. The software does not change how the boiler is operated, or even how the boiler is managed and controlled, but rather optimizes its management just as an ideal operator would.

The advanced control system is simply a computer software package that is installed in the powerhouse control room to utilize existing parametric monitoring (such as fuel flow and combustion air flow) within the existing Distributive Control System (DCS). The system does not add any additional monitoring systems or physically modify the boiler in any way. The control package currently in place within the DCS requires excessive operator interaction with the controls and results in inefficient operation of the boiler. The new system will perform many of the same operator functions automatically and thereby improve efficiency of the boiler and reduce the need for supplemental fossil fuel. A similar system installed on a recovery furnace at another GP pulp and paper mill resulted in an efficiency increase in operation of the furnace in terms of the amount of steam produced from each pound of black liquor solids (BLS) combusted (without increasing the amount of BLS fired). The unit efficiency increased from producing 3.22 pounds of steam per pound of black liquor solids (lb steam/lb BLS) to producing 3.32 lb steam/lb BLS when comparing the six months of operation before installation of the software package to the three months after the installation.

The advanced control system will not allow the boiler to operate in a manner differently than it can currently operate. The control system does not alter the fuels combusted or increase the capacity of the boiler to burn bark or fuel oil. No existing operational limits will be increased or exceeded as a result of implementation of the system, and the boiler will not burn any more of a given fuel than it is currently able and permitted to burn. In addition, operational restraints ensuring compliance with environmental limits and regulations can be considered within the new software system, providing a greater assurance of compliance in the future.

Actual operation of the No. 4 Combination Boiler will be optimized to take advantage of the lowest cost fuel, which is bark, just as it is now. There exists no future operating scenario that is not possible at the present time with the current operator-driven control capability. The advanced control system will simply allow the Mill to maximize the burning of bark fuel instead of fuel oil.

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For the reasons stated above, Georgia-Pacific believes that installation of the boiler control software does not constitute a modification which would trigger NSR or any other State of Florida permitting requirements. The Mill wishes to begin installation of the damper control components of the system early this month to take advantage of the boiler annual outage. Given our expedited timeline, we respectfully request that FL DEP consider this request at its earliest convenience. Should you have any questions concerning this submittal, please contact Ron Reynolds at (386) 329-0967.

Sincerely,



Gary Frost  
Vice President and Mill Manager  
Georgia-Pacific Consumer Operations LLC – Palatka Pulp & Paper Mill

Mr. Jeffery F. Koerner  
November 5, 2010

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cc: Ron Reynolds, Georgia-Pacific Consumer Operations LLC (Palatka, Florida)  
Scott Bailey, Georgia-Pacific Consumer Products LP (Atlanta, Georgia)  
Melissa Antoine, Georgia-Pacific LLC (Atlanta, Georgia)  
Wayne Galler, Georgia-Pacific LLC (Atlanta, Georgia)



**Georgia-Paci**

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