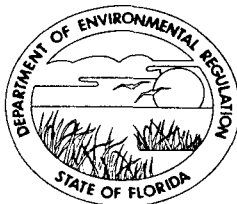


Bruce Mitchell

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

January 11, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Henry Hirschman
General Manager
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32078-0919

Dear Mr. Hirschman:

Re: Amendments to Construction Permit
AC 54-108945: Tall Oil Plant
Georgia-Pacific Corporation

The Department is in receipt of Mr. Vernon L. Adam's letter dated December 14, 1987, and received December 18, 1987, which requested amendments to the above referenced construction permit. The following shall be changed and added:

Expiration Date:

From: December 31, 1987
To: April 30, 1988

Specific Conditions:

No. 2:

From: Crude oil production shall not exceed 1.246 tons per hour and 10,920 tons per year.

To: The maximum operating rate is one cook of 55 tons of crude tall oil per 12-hour period with a yearly maximum of 20,020 tons of crude tall oil. This shall not be exceeded without prior approval.

Mr. Henry Hirschman
Page Two
January 11, 1988

No. 3:

From: Maximum TRS emissions shall not exceed 0.05 lb/ton crude oil produced (0.06 lb/hr, 0.27 TPY).

To: Maximum TRS emissions shall not exceed 0.05 lb/ton crude tall oil produced (0.23 lb/hr; 0.50 TPY; based on 12-hour average).

No. 10: (New)

As a surrogate parameter for TRS control, the scrubber liquor outlet flow rate shall be monitored and maintained at 149 GPM (gallons per minute) or greater during the entire acidulation and neutralization process of each cook. The scrubber medium is white liquor and must be at least digester quality type of white liquor.

Attachment to be Incorporated:

8. Mr. Vernon L. Adam's letter dated December 14, 1987, and received December 18, 1987.

This letter must be attached to your construction permit, No. AC 54-108945, and shall become a part of the permit.

Sincerely,


Dale Twachtmann
Secretary

DT/ks

attachment

cc: B. Stewart, NE Dist.
B. Pittman, Esq.
V. Adams, GPC

ATTACHMENT



Georgia-Pacific Corporation *Palatka Operations*
Southern Pulp & Paper Division
 P.O. Box 919
 Palatka, Florida 32078-0919
 Telephone (904) 325-2001

December 14, 1987

DER
 DEC 18 1987
 BAQM

Mr. Bruce Mitchell
 Florida Department of
 Environmental Regulation
 Twin Towers Office Bldg.
 2600 Blairstone Road
 Tallahassee, FL 32301

Dear Bruce:

Pursuant to our phone conversation and my earlier discussions with Mr. Johnny Cole, I am sending you requested changes in the wording for our Tall Oil plant operating permit No. A054-130511. It is imperative that the permit reflect and allow for the operation of a batch type operation.

Please change the numbered specific conditions listed in the permit to read as modified below:

1. The maximum operating rate is one 55 ton cook of crude tall oil per 12 hour period with a yearly maximum of 20,020 tons of crude tall oil. This shall not be exceeded without prior approval.
4. The permitted maximum allowable rate for each pollutant is as follows:

<u>Pollutant</u>	<u>Rule</u>	<u>Emission Rate</u>	
		<u>Lbs./Hr.</u>	<u>TPY</u>
TRS	17-2.600(4)(c)2.a.,FAC	.229*	.501

*Basis: Based on .05 lbs. TRS/Ton CTO produced at a 12-hour average. (Note: This is a 12-hour average emission limit. Instantaneous emission rates will exceed this limit)

8. As the surrogate parameter for TRS control, the scrubber liquor outlet flow rate (in GPM) shall be monitored and maintained at 149 GPM or greater during the entire acidulation and neutralization process of each cook. The quality of the scrubber liquor which is "white" liquor shall be maintained at process specifications.

1-11-88 spoke 2 V.A.
- alkali of 0.95
JAL

The reason for the change in the flow rate specified in Condition 8 is that an error was made in the original calculations since an incorrect pump flow was used. In reviewing specifications for the pump, the error was discovered and corrected. The improper flow number produced a factor which was 1.56 times the correct reading. Thus the 233 GPM flow rate which was recorded during the compliance test was in reality 149 GPM. Since we have demonstrated compliance at 149 GPM, this is the proper surrogate parameter.

Sincerely,



Vernon L. Adams
Supervisor of
Environmental Affairs

VLA:ps

- cc: W. L. Baxter
H. Hirschman
E. J. Schmidt

Johanny Cole 1-11-88 ABM (spoke 2 IC)