

From: [Bull, Robert](#)
To: [Walker, Elizabeth \(AIR\)](#)
Subject: FW: PALATKA PULP and PAPER MILL; 1070005-066-AC
Date: Thursday, March 24, 2011 10:46:30 AM

FYI- More GP Palatka Comments

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Thursday, March 24, 2011 10:43 AM
To: Bull, Robert
Cc: Kelley, Tracey S.; Galler, Wayne J.; Antoine, Melissa K.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Bobby,

A couple of more bullets that will be on the letter going out today.

- TE&PD, Section 3, Paragraph 4: The first two sentences should be revised similarly to the second bullet above (actually below, since this will be added to the previous list below) to reflect that the ID fan will also be replaced, not just the drive type.
- TE&PD, Section 3, Paragraph 5 states that the replacement of the 28 continuous tube sections of the superheater was previously permitted under permit no. 1070005-038-AC, PSD-FL-380. Review of the 038-AC permit does not support this. While the replacement of tubes in the #4 Recovery Boiler (EU ID 018) was covered, there was no mention of tube replacement for the #4 Combination Boiler. However, this correction has no effect on the current permitting action which will authorize the superheater tube replacement.

I also have a suggestion that I won't include as formal comment. Section 2, Part 9, Actual Emissions Reporting, paragraph b specifies the annual reporting of actual emissions within 60 days of year end. If this could be changed to coincide with the due date for the AOR, that would be convenient. But if not, it's only a minor concern.

Thank you again

Ron

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

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: Wednesday, March 23, 2011 4:11 PM
To: Reynolds, Ron E.
Cc: Galler, Wayne J.; Antoine, Melissa K.; Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Thanks Ron.

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Wednesday, March 23, 2011 4:07 PM
To: Bull, Robert
Cc: Galler, Wayne J.; Antoine, Melissa K.; Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Bobby,

- **Section 1, Facility Description:** The emissions unit list does not include all EU's listed on our current Title V permit. Those missing are 039-Bark Hog, 047-BSW lines 3,5,6,&7, 048-O2 DeLig system, and 050-Converting.
- **Section 1, General Information – Proposed project description:** The descriptions says that the existing steam driven induced draft fan-drive is being replaced with an electric motor. Actually the fan will be replaced also (with no capacity increase), so we suggest it be revised as: "replace the existing steam-driven induced draft fan-drive with an electric *fan motor*".
- **Section 3, A – emissions unit description** says that the unit continuously monitors for TRS emissions. This is incorrect; there is no TRS CEMS on the #4 Combination Boiler. Also, the last statement in the description which begins with "This project includes..." should be revised to include the replacement of the ID fan, and the partial replacement (28 tube sections) of the superheater.
- **Section 3, Permit Condition A.2.c** should be revised to read "Replace the existing steam turbine-driven ~~on the~~ Induced Draft (ID) fan for the no. 4 Combination Boiler with an electric ~~motor~~-ID fan."

- **Section 3, Permit Condition A.4** lists an incorrect maximum heat input rate for bark/wood firing. The rate is listed as 564.0 MMBtu/hr, but should be 512.7 MMBtu/hr.
- **TE&PD, Section 1, Paragraph 2** of the Project Description (top of page 9): The first sentence says that the replacement of the 28 tube sections of the superheater section was originally permitted in permit No. 1070005-045-AC. Actually, the modification to the dust collection system was part of that permit along with the gas conversion, and the superheater section modification should be referenced in the second sentence along with the ID fan replacement.
- **TE&PD, Table 1:** The 'could have accommodated' emissions for CO and VOC are added to the baseline actual emissions. We suggest including it as a separate column to clearly identify the portions that are baseline emissions and could have accommodated emissions.
- **TE&PD, In Paragraph 4 of Section 3.** Department Review of the Technical Evaluation, it is stated, "The permittee considered the restored bark rate as 'could have accommodated' rate in its review of potential emissions." However, we excluded the restored bark rate from 'could have accommodated' because it is clearly related to the project. We suggest updating the sentence to read, "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 formal version with Gary Frost's signature to follow hard copy.

Let me know if any questions.

Ron
386-329-0967

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

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: Wednesday, March 23, 2011 9:14 AM
To: Reynolds, Ron E.
Cc: Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Good Morning,

We received the proof of publication yesterday for the gas burner project. Will GP have any comments on the draft?
Thanks

From: Bull, Robert
Sent: Thursday, March 17, 2011 7:54 AM
To: 'Reynolds, Ron E.'
Cc: Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Great. thanks for the update.

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Thursday, March 17, 2011 7:51 AM
To: Bull, Robert
Cc: Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

I'm told the notice was published on Saturday, March 12. We will get the documentation to you as soon as available.

Thanks

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

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: Thursday, March 17, 2011 7:45 AM
To: Reynolds, Ron E.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Ron,

Do you have an anticipated publication date for Project 066-AC?

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Thursday, March 17, 2011 7:40 AM
To: Bull, Robert
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Okay; thanks.

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

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: Thursday, March 17, 2011 7:37 AM
To: Reynolds, Ron E.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Ron,

I was out the last two days and no applications have been forwarded to me to date. I'll follow up with Jeff today and get back with you. Thanks

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Tuesday, March 15, 2011 11:29 AM
To: Bull, Robert
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Bobby,

Did you receive the Lime Kiln burner application yesterday? It was sent out on Friday.

thanks

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

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: Friday, March 11, 2011 7:48 AM
To: Walker, Elizabeth (AIR); Reynolds, Ron E.
Cc: Kelley, Tracey S.
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Good Morning,

Elizabeth, thanks for forwarding the document.

Ron/Tracey- Please contact me if you have any questions or concerns. To help expedite the permit issuance, please forward the proof of publication to me after receipt from the publishing paper. Also, if you have any comments, please forward to me as soon as they are ready for incorporation into the final documents. Thanks and have a good weekend.

From: Walker, Elizabeth (AIR)
Sent: Thursday, March 10, 2011 4:46 PM
To: 'Reynolds, Ron E.'
Cc: Kelley, Tracey S.; Bull, Robert
Subject: RE: PALATKA PULP and PAPER MILL; 1070005-066-AC

Ron,

The public notice is attached in MS Word format.

Thank you!

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

From: Reynolds, Ron E. [mailto: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

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](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

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

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.