

Department of **Environmental Protection**

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

August 9, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Myra Carpenter Environmental Superintendent Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919

Dear Ms. Carpenter:

RE: Georgia-Pacific Corporation Palatka Mill

In response to your July 26 letter concerning the replacement of a blow tank at the Palatka Mill, the original application and resulting permit No. AC 54-266676/PSD-FL-226 were reviewed. Neither the application nor the permit specifically addressed the blow tanks at this Mill. According to correspondence in our files, all modifications authorized by this permit were completed by March, 1996.

If the existing blow tank is replaced by an equivalent, if not identical, unit (same size, capacity, fittings, etc.), the project is a replacement of a component during routine maintenance and a permit is not required.

A blowtank with larger diameter blow lines is not considered to be equivalent equipment if it allows actual processing of more wood chips by relieving a bottleneck. If this is the case, the proposed project is not routine maintenance.

Based on our conversation of August 9, it appears that the new unit is of equivalent capacity to the one it will replace and will not debottleneck the digesters. If the new blowtank arrangement is of higher capacity (and actually results in increased production), you can apply to amend Permit AC 54-266676/PSD-FL-226. Because actual emissions from replacement of the digesters have not yet been established, the Department can assume actual production and emissions are equal to the limits in this permit. A public notice is required for any amendment.

Myra Carpenter 9-Aug-1996 Page 2

If you need further guidance on this issue, please contact Willard Hanks at (904)488-1344.

Sincerely,

A. A. Linero, Administrator New Source Review Section

AAL/wh

cc: C. Kirts; NED

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Georgia-Pacific Corporation

RECEIVED

JUL 20 1996 DIVISION OF AIR RESOURCES MANAGEMENT Palatka Operations Packaged Products Division P.O. Box 919 Palatka, Florida 32178-0919 Telephone (904) 325-2001

July 26, 1996

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BUREALLOE

Mr. Al Linero, P.E. Administrator, New Source Review State of Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

RE:

Georgia-Pacific Corporation, Palatka Mill

AC54-266676/PSD-FL-226

Dear Mr. Linero:

Georgia-Pacific Corporation (G-P) was issued the above-referenced construction permit in September, 1995, which allowed several changes at the Palatka Mill to be implemented. The replacement of two batch digesters was included in these approved changes. G-P would now like to notify the Department of some additional changes planned for the batch digester system in the near future. These changes include the replacement of the existing blow tank with a new blow tank. In addition, the blow lines connecting to the blow tank will be replaced with larger diameter lines.

These changes are being implemented for several reasons. The existing blow tank is in need of repair. However, it is not cost effective to repair the tank; therefore, G-P is planning on replacing the tank. By increasing the size of the lines and nozzles going to the blow tank, as well as increasing the diameter of blow tank dome, less fiber carryover to the non-condensable gas (NCG) system will result. These activities are planned to occur during the August-September, 1996 annual maintenance outage.

Since the batch digester system is currently under a construction permit and no increase in the permitted pulp production rate is requested, no additional permitting should be necessary to implement these additional changes. This letter is to serve as notification to the Department of these additional construction activities prior to implementation.

The engineer-of-record on the construction permit, David Buff, P.E., of KBN, has reviewed these construction plans. He has concluded that these activities will not result

MR. AL LINERO Page Two July 24, 1996

in a modification under the Florida rules, and that the changes can be implemented under the current construction permit. His certification is attached.

Please call if you have any questions concerning this notification.

Sincerely,

Myra J. Carpenter

Environmental Superintendent

Myra of Carpenter

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Attachment

cc: W. L. Baxter

B. T. Champion, GA030, G-09

Henry Hirschman

Robert Leetch, FDEP, Jacksonville

J. F. Parrish

Project:

Georgia-Pacific Corporation
Permit No. AC54-266676; PSD-FL-226
Replacement of Blow Tank and Blow Lines, Batch Digester System

Professional Engineer Statement:

- I, the undersigned, hereby certify that:
- (1) To the best of my knowledge, there is reasonable assurance (a) that the air pollutant emissions unit(s) and the air pollution control equipment described in this letter notification, 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
- (2) To the best of my knowledge, any emission estimates reported or relied on in this letter notification 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 further certify that the engineering features of each such emissions unit described in this letter notification 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 air emissions of the pollutants characterized in this application.

David A. Buff, P.E.

David A. Buff, P.E.

July 22, 1996

Date

Florida P. E. #19011

(seai)

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Georgia Pacific Corporation

Permit(s) Numbered:

AC	54	266676
PSD	FL	226

Documents:

Period during

Detailed Description

which

document was

received

Application

1. COLOR PHOTOGRAPHS DATED JULY 1995

Georgia Pacific Corporation



Palatka Operations
Packaged Products Division
P.O. Box 919
Palatka, Florida 32178-0919
Telephone (904) 325-2001

March 13, 1996

AIR BUREAU OF
REGULATION

Mr. Willard Hanks
Permitting and Standards Section
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE:

Georgia-Pacific Corporation

Palatka Operations

Kraft Pulp Mill Modification

Permit No.: AC54-266676 (PSD-FL-226)

Dear Mr. Hanks:

This letter is to update the Department of the status of the Digester Replacement and Pulp Mill Efficiency Improvement Projects authorized by Permit No. AC54-266676 (PSD-FL-226)

The modification consists of the replacement of two digesters, adding additional screen tubes to the recovery boiler, installing a new total reduced sulfur scrubber ahead of the TRS Incinerator, installing a chip conditioner system, installing a white liquor heating system, and installing an automatic cleaning system on the lime mud filter. The current status is that the work authorized by the permit is now complete. Initial and annual compliance tests for the No. 4 Recovery Boiler and TRS Incinerator are scheduled for March 25 - April 5, 1996.

If you have any questions, please call me at 904-329-0918.

Sincerely,

Myra J. Carpenter

Environmental Superintendent

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MR. WILLARD HANKS Page Two March 13, 1996

W. L. Baxter cc:

D. A. Buff, KBN

B. T. Champion, GA030, G-09

cc: R leetch, NED EPA





Palatka Operations Packaged Products Division P.O. Box 919 Palatka, Florida 32178-0919 Telephone (904) 325-2001

January 25, 1996

Mr. Willard Hanks
Florida Department of Environmental Protection
Permitting and Standards Section
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JAN 29 1996

BUREAU OF AIR REGULATION

RE: Permit Number AC54-266676/PSD-FL-226

Dear Mr. Hanks:

This letter is to inform the Department of the status of the Digester Replacement and Pulp Mill Efficiency Improvement Projects authorized by Permit Number AC54-26676 (PSD-FL-226). The modification consists of the replacement of two digesters, adding additional screen tubes to the recovery boiler, installing a new total reduced sulfur scrubber ahead of the TRS incinerator, installing a chip conditioner system, installing a white liquor heating system, and installing an automatic cleaning system on the lime mud filter.

The digester replacement is behind schedule, but we expect to begin the project in the next month or so. However, the new TRS scrubber is already operational. (You may recall that the new scrubber and existing incinerator were determined to be BACT for the digester system.) The screen tube project is complete. The white liquor heater and automatic cleaning system on the lime mud filter have also been installed. Work has begun but is not complete on the chip conditioner system. We hope to have the chip conditioner system fully operational by late February.

Compliance testing of the recovery boiler is scheduled for March. Compliance testing of the incinerator will be scheduled after the new digesters are installed and operational.

If you have any questions, please call me at 904-329-0918.

Sincerely,

Myra J. Carpenter

Environmental Superintendent

MR. WILLARD HANKS Page Two January 25, 1996

cc: W. L. Baxter

M. Benjamin, FDEP, Jacksonville B. T. Champion, GA030, G-09

J. E. Taylor

CC: C. Kirts