

Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

November 23, 2004

CERTIFIED MAIL - Return Receipt Requested

Mr. Theodore D. Kennedy Vice President – Palatka Operations Georgia-Pacific Corporation Palatka Mill P.O. Box 919 Palatka, Florida 32178-0919

RE: Request to Install a Bark Hog

Project No.: 1070005-028-AC/PSD-FL-341

Dear Mr. Kennedy:

One copy of the Technical Evaluation and Preliminary Determination, the Public Notice, and the Draft air construction permit for Georgia-Pacific Corporation's Palatka Mill located North of CR 216 and West of US 17, Palatka, Putnam County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included.

The "<u>PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT</u>" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer

Chief

Bureau of Air Regulation

Lina & Vielhaur

TLV/jkp/bm

Enclosures

In the Matter of an Application for Permit by:

Georgia-Pacific Corporation P.O. Box 919 Palatka, Florida 32178-0919 Draft Air Construction Permit Project No.: 1070005-028-AC

PSD Permit Project No.: PSD-FL-341 Palatka Mill

Putnam County

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

Facility Location: The applicant, Georgia-Pacific Corporation, applied to the permitting authority for an air construction permit (AC) for a modification to the Palatka Mill located North of CR 216 and West of US 17, Palatka, Putnam County.

Project: The applicant, Georgia-Pacific Corporation, applied on July 13, 2004, to the permitting authority for an air construction permit (AC) for a modification to the facility. On October 20, 2004, the mill requested that some specific condition language related to permitted capacity on several emissions units be edited.

The AC is being issued to allow the construction of a new Bark Hog, which replaces the existing one; to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m.. Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. A copy of the complete project file is also available at the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 (Telephone: 904/807-3300).

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Georgia-Pacific Corporation Palatka Mill

Draft Air Construction Permit Project No.: 1070005-028-AC/PSD-FL-341

Page 2 of 3

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state: (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action: and. (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone number listed above. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the

Georgia-Pacific Corporation

Palatka Mill

Draft Air Construction Permit Project No.: 1070005-028-AC/PSD-FL-341

Page 3 of 3

Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Trina L. Vielhauer, Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on to the persons listed below.

Mr. Theodore D. Kennedy *, Vice President - Palatka Operations, Georgia-Pacific Corporation, Palatka Mill

Ms. Myra Carpenter, G-PC

Mr. David Buff, P.E., GAI

Mr. Chris Kirts, NED Office

Mr. Gregg Worley, EPA Region 4

Mr. John Bunvak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on

this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby

acknowledged.

(Date

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

Permitting Authority
Department of Environmental Protection
Bureau of Air Regulation

Draft Air Construction Permit Project No.: 1070005-028-AC/PSD-FL-341 Georgia-Pacific Corporation Palatka Mill Putnam County

Applicant: The applicant for this project is the Georgia-Pacific Corporation, Palatka Mill, located North of CR 216 and West of US 17, Palatka, Putnam County. The applicant's Authorized Representative is: Mr. Theodore D. Kennedy, Vice President – Palatka Operations, Georgia-Pacific Corporation, Palatka Mill, P.O. Box 919, Palatka, Florida 32178-0919

Facility Location: The applicant operates the Palatka Mill, which is a paper and pulp mill located North of CR 216 and West of US 17, Palatka, Putnam County.

Project: The applicant, Georgia-Pacific Corporation, applied on July 13, 2004, to the permitting authority for an air construction permit (AC) for a modification to the facility. On October 20, 2004, the mill requested that some specific condition language related to permitted capacity on several emissions units be edited.

The AC is being issued to allow the construction of a new Bark Hog, which replaces the existing one: to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. A copy of the complete project file is also available at the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 (Telephone: 904/807-3300).

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be provided to

the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

PERMITTEE:

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit Number: 1070005-028-AC

PSD-FL-341

Date of Issue: Expiration Date:

January xx, 2005 January 31, 2006

County:

Putnam

Project:

New Bark Hog

This permit is issued to allow the construction of a new Bark Hog, which replaces the existing one; to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4; and, to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions units. These changes will occur at the existing Georgia-Pacific Corporation's Palatka Mill located North of County Road 216 and West of U.S. Highway 17, Palatka, Putnam County, Florida. UTM Coordinates: Zone 17; 434.0 km East; and, 3283.4 km North; Latitude: 29° 41' 00" North; and, Longitude: 81° 40' 4" West.

The existing Bark Hog, installed in the 1970s, is a swing hammer type crusher used to crush and pulverize the oversized bark/wood. The new emissions unit is a Montgomery stationary-style Bark Hog that will utilize a round wheel with chisels and slicers. It will cut the bark/wood, rather than crush them. This project should increase the over-all up-time for the delivery of properly sized bark/wood for firing in the #4 CB and should inevitably reduce the firing of fuel oil.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Initial Title V Air Operation Permit No.: 1070005-002-AV Title V Air Operation Permit Revision No.: 1070005-023-AV

Air Construction Permit No.: 1070005-017-AC Air Construction Permit No.: 1070005-024-AC Air Construction Permit No.: 1070005-025-AC

Documents on file with the Department:

July 13, 2004: Receipt of Application;

August 12, 2004: Request for Additional Information (RAI);

September 13, 2004: Receipt of Response to the RAI;

October 13, 2004: Receipt of E-mail and Attached Letter (hard copy received October 20, 2004); application complete.

Michael G. Cooke, Director Division of Air Resource Management

MGC/tlv/bm

"More Protection, Less Process"

Printed on recycled paper.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

1070005

Permit/Cert Number:

January xx, 2005

Date of Issue: Expiration Date:

January 31, 2006

1070005-028-AC/PSD-FL-341

County:

Putnam

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.

- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does no relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and,
 - b. The period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Putnam

Date of Issue: Ja Expiration Date: Ja

January xx, 2005 January 31, 2006

County:

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - (x) Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Compliance with New Source Performance Standards (NSPS)
 - () Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements:
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date: January xx, 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

A. No. 4 Combination Boiler (Emissions Unit 016): 1070005-017-AC. Specific Condition 1. Except for the following changes made to specific condition No. 1, all of the other specific conditions established in air construction permit, No. 1070005-017-AC, shall remain unchanged unless otherwise noted.

FROM:

1. Permitted Capacity. The maximum heat input rate is:

Maximum Heat Input (MMBtu/hr)	Fuel Options	
512.7 1	Carbonaceous fuel only	
	Or	
	Carbonaceous fuel in combination w/ fuel oil	
418.6 ¹	Fuel oil only	

Shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. [Permit #AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

TO:

1. Permitted Capacity. The maximum heat input rate is:

Maximum Heat Input (MMBtu/hr)	Fuel Options	
512.71	Carbonaceous fuel only	
	or	
	Carbonaceous fuel in combination w/ fuel oil	
418.6	Fuel oil only	

Based on 57 tons per hour carbonaceous fuel (bark/wood chips) with an average heating value of 4500 Btu/lb on a wet, as-fired basis (AP-42: Subsection 1.6. Wood Waste Combustion In Boilers).

[AC54-163040; Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

B. No. 4 Combination Boiler (Emissions Unit 016): 1070005-024-AC. Specific Conditions B.1.a. and B.1.b. Except for the following changes made to specific conditions Nos. B.1.a. and B.1.b., all of the other specific conditions established in air construction permit, No. 1070005-024-AC, shall remain unchanged unless otherwise noted.

FROM:

B.1.a. Permitted Capacity – Fuel Oil Only. The maximum heat input rate, when firing fuel oil only, is 418.6 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1070005-017-AC; FINAL Title V Operation Permit No. 1070005-023-AV]

Georgia-Pacific Comoration Post Office Box 919

Palatka, Florida 32178-0919

I.D. Number:

1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue Expiration Date: January xx. 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

B.1.b. Permitted Capacity - Carbonaceous Only or in Combination with Fuel Oil. The maximum heat input rate, when firing carbonaceous fuel only or in combination with fuel oil is 512.7 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.

Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1070005-017-AC; FINAL Title V Operation Permit No. 1070005-023-AV]

TO:

B.1.a. Permitted Capacity - Fuel Oil Only. The maximum heat input rate, when firing fuel oil only, is 418.6 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-017-AC; 1070005-023-AV; and. 1070005-028-AC]

B.1.b. Permitted Capacity - Carbonaceous Only or in Combination with Fuel Oil. The maximum heat input rate, when firing carbonaceous fuel only or in combination with fuel oil, is 512.7 MMBtu/hr (based on 57 tons per hour carbonaceous fuel (bark/wood chips) with an average heating value of 4500 Btu/lb on a wet, as-fired basis (AP-42: Subsection 1.6. Wood Waste Combustion In Boilers).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-017-AC; 1070005-023-AV; and, 1070005-028-AC]

C. No. 5 Power Boiler (Emissions Unit 015): 1070005-024-AC. Specific Condition A.1. Except for the following changes made to specific condition No. A.1., all of the other specific conditions established in air construction permit, No. 1070005-024-AC, shall remain unchanged unless otherwise noted.

FROM:

Permitted Capacity. The maximum heat input rate is 568.9 MMBtu/hr, which shall not be exceeded as a 24-hr average A.1. and shall not be exceeded by more than 10% for any 1-hr average.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's permitted capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; FINAL Title V Operation Permit No. 1070005-023-AV]

TO:

A.1. Permitted Capacity. The maximum heat input rate is 568.9 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1070005-023-AV; and, 1070005-028-AC]

D. No. 4 Power Boiler (Emissions Unit 014): 1070005-025-AC. Specific Condition 4. Except for the following changes made to specific condition No. 4., all of the other specific conditions established in air construction permit, No. 1070005-025-AC, shall remain unchanged unless otherwise noted.

FROM:

4. Permitted Capacity EU014. The maximum heat input rate is 134 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.] [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Georgia-Pacific Corporation

Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number:

1070005

Permit/Cert Number:

January xx, 2005

Date of Issue: Expiration Date:

January 31, 2006

1070005-028-AC/PSD-FL-341

County: Putnam

SPECIFIC CONDITIONS:

TO:

4. <u>Permitted Capacity EU014.</u> The maximum heat input rate is 134 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

E. <u>No. 5 Power Boiler (Emissions Unit 015)</u>: 1070005-025-AC. Specific Condition 5. Except for the following changes made to specific condition No. 5., all of the other specific conditions established in air construction permit, No. 1070005-025-AC, shall remain unchanged unless otherwise noted.

FROM:

5. <u>Permitted Capacity (EU015)</u>. The maximum heat input rate is 568.9 MMBtu/hr, which shall not be exceeded as a 24-hr average and shall not be exceeded by more than 10% for any 1-hr average. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

TO:

5. <u>Permitted Capacity (EU015)</u>. The maximum heat input rate is 568.9 MMBtu/hr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 1070005-028-AC]

F. New Bark Hog and the Existing Bark/Wood Chip Handling System (Emissions Unit 039).

DESCRIPTION: The existing Bark Hog, installed in the 1970s, is a swing hammer type crusher used to crush and pulverize the oversized bark/wood. Since this operation has experienced considerable down time by pluggage and choking and has had difficulty in hammering the bark/wood into uniform and easily handled sized chips, a new Bark Hog will be installed to replace the existing one. The new emissions unit is a Montgomery stationary-style Bark Hog that will utilize a round wheel with chisels and slicers. It will cut the bark/wood, rather than crush them. This project should increase the over-all up-time for the delivery of properly sized bark/wood for firing in the #4 CB and should inevitably reduce the firing of fuel oil.

The existing Bark/Wood Chip Handling System receives bark/wood from either the adjacent roundwood processing facility or from offsite purchased bark/wood. The bark/wood from the roundwood processing facility is transferred to the Transfer Tower via a covered conveyor. It is then transferred to the Hog Tower through a covered conveyor, where it is screened and either sent to the storage silo (which pneumatically feeds the #4 CB) or to the Bark Hog for chipping and transferring to the storage silo feeding the #4 CB. The offsite purchased bark/wood is unloaded in a staging area using a hydraulic truck hopper, where it is placed in a storage pile by a front-end loader, and then transferred to the Transfer Tower through a series of covered conveyors and chutes, after which it takes the same routes as the roundwood to get to the storage silo feeding the #4 CB.

The Bark/Wood Chip Handling System utilizes the following measures to control and minimize fugitive particulate matter (PM/PM10) emissions: covers on most conveyors; enclosure of all conveyor transfer points; limits on front end loader speeds when operating in the storage pile area; enclosure of the screen silo for bark/wood chips; total enclosure of the Bark Hog; and, a pneumatic system (with a cyclone) used to transfer bark/wood chips from the storage silo to the #4 CB.

The following specific conditions apply to the new Bark Hog and the Existing Bark/Wood Chip Handling System (Emissions Unit 039):

- 1. The new Bark Hog shall be installed as described in the Application to Construct received July 13, 2004; and, the existing Bark Hog will be removed from service upon the installation completion of the new Bark Hog. Any deviations shall be provided to the Department by the Professional Engineer of Record.
- 2. <u>Unconfined Emissions of Particulate Matter</u>. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter (PM) from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following: a) Paving and maintenance of

Georgia-Pacific Corporation Post Office Box 919 Palatka, Florida 32178-0919 I.D. Number: 1070005

Permit/Cert Number: 1070005-028-AC/PSD-FL-341

Date of Issue: Expiration Date: January xx, 2005 January 31, 2006

County:

Putnam

SPECIFIC CONDITIONS:

roads, parking areas and yards; b) application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent PM from becoming airborne; e) landscaping or planting of vegetation; f) use of hoods, fans, filters, and similar equipment to contain, capture and/or vent PM; g) confining abrasive blasting where possible; and, h) enclosure or covering of conveyor systems. [Rules 62-296.320(4)(c)1. & 3., F.A.C.]

Potential to Emit (PTE).

3. <u>Permitted Capacity</u>. For PSD purposes, the PTE is based on a processing rate of 499,320 tons/yr of bark and wood. [Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions, PTE; and, application received July 13, 2004]

Best Management Practices to Minimize VOC Emissions from the Outside Storage of Bark and Wood Chips.

4. Pursuant to the BACT determination, Best Management Practices (BMP) shall be used to minimize VOC emissions from the outside storage of bark and wood chips. Therefore, a BMP Plan to minimize the VOC emissions from the outside storage of bark and wood chips shall be submitted to the NED for approval prior to submission of an application for an operation permit (Title V Revision or Renewal) and shall be finalized and incorporated into the Title V Air Operation Permit. [Rules 62-4.070(3), 62-212.400(6), BACT, and 62-213.400(1) & (2), F.A.C.]



Department of **Environmental Protection**

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

Colleen M. Castille Secretary

P.E. Certification Statement

DRAFT Permit No.: 1070005-028-AC / PSD-FL-341 Permittee: Georgia Pacific Corporation

Palatka Pulp and Paper Mill

Project: New Bark Hog and Clarification of Existing Permits

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This draft permit was prepared under my direct supervision by Mr. Bruce Mitchell of my staff.

Registration Number: 34536

Permitting Authority:

Department of Environmental Protection

Bureau of Air Regulation

111 South Magnolia Drive, Suite 4

Tallahassee, Florida 32301 Telephone: 850/488-0144

Fax: 850/922-6979

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

Replacement of a Bark Hog

Georgia-Pacific
Palatka Mill
Facility ID No.: 1070005
Putnam County

Air Construction Permit/PSD Permit
Draft Air Construction Permit No.: 1070005-028-AC/PSD-FL-341

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

APPLICATION INFORMATION.

A. Applicant Name and Address:

Georgia-Pacific

Palatka Mill

P.O. Box 919

Palatka, Florida 32178-0919

Responsible Official

Mr. Theodore D. Kennedy, Vice President - Palatka Operations

B. Reviewing and Processing Schedule:

July 13, 2004: Receipt of Application;

August 12, 2004: Request for Additional Information (RAI);

September 13, 2004: Receipt of Response to the RAI;

October 13, 2004: Receipt of E-mail and Attached Letter (hard copy received October 20, 2004); application complete.

2. FACILITY INFORMATION.

A. Facility Location

The Georgia-Pacific Corporation's Palatka Mill is located North of CR 216 and West of US 17 in Palatka, Putnam County, Florida. The UTM coordinates of this facility are: Zone 17; 434.0 km East; and, 3283.4 km North.

B. Standard Industrial Classification Code (SIC):

Major Group No.	26 Paper and Allied Products		
Group Nos.	261 and 262	Pulp Mills and Paper Mills	
Industry Nos.	2611 and 2621	Pulp and Paper Mills	

C. Facility Category

The Palatka Mill is classified as a major air pollutant emitting facility and a Title V facility pursuant to Rule 62-210.200, F.A.C., Definitions. The initial Title V Permit, No. 1070005-002-AV, was effective on October 30, 2002, and expires October 30, 2005. The last revision, No. 1070005-023-AV, was effective on May 11, 2004, and expires October 30, 2005.

Regulatory Categories:

<u>Title III</u>: The existing facility is identified as a potential major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

3. PROJECT DESCRIPTION.

An Air Construction (AC) Permit/PSD Permit is required to install a new Bark Hog in the Bark Handling System, due to a net increase in particulate matter (PM: 8.22 tons per year (TPY); fugitives); a net increase in PM less than ten (10) microns (PM₁₀: 3.26 TPY; fugitives); and, a significant net increase in volatile organic compounds (VOC: 300.43 TPY; fugitives). The AC will also be used to remove/edit some language associated with the production rates of the Nos. 4 and 5 Power Boilers (PBs) and the No. 4 Combination Boiler (#4 CB), that were installed in the Title V Air Operation Permit and did not undergo any PSD preconstruction review pursuant to Rule 62-212.400, F.A.C.; and, to remove the "Permitting Note" under "Permitted Capacity" for the above referenced emissions units.

The Bark Handling System receives bark/wood from either the adjacent roundwood processing facility or from offsite purchased bark/wood. The bark/wood from the roundwood processing facility is transferred to the Transfer Tower via a covered conveyor. It is then transferred to the Hog Tower through a covered conveyor, where it is screened and either sent to the storage silo (which pneumatically feeds the #4 CB) or to the Bark Hog for chipping and transferring to the storage silo feeding the #4 CB. The offsite purchased bark/wood is unloaded in a staging area using a hydraulic truck hopper, where it is placed in a storage pile by a front-end loader, and then transferred to the Transfer Tower through a series of covered conveyors and chutes, after which it takes the same routes as the roundwood to get to the storage silo feeding the #4 CB.

The existing Bark Hog, installed in the 1970s, is a swing hammer type crusher used to crush and pulverize the oversized bark/wood. Since this operation has experienced considerable down time by pluggage and choking and has had difficulty in hammering the bark/wood into uniform and easily handled sized chips, a new Bark Hog will be installed to replace the existing one. The new emissions unit is a Montgomery stationary-style Bark Hog that will utilize a round wheel with chisels and slicers. It will cut the bark/wood, rather than crush them. This project should increase the over-all up-time for the delivery of properly sized bark/wood for firing in the #4 CB and should inevitably reduce the firing of fuel oil.

For the #4 CB, there are no permit restrictions on the fuel feed rates, just the limits on the heat input, which are 512.7 MMBtu/hr, for wood only or a combination of wood and fuel oil, and 418.6 MMBtu/hr, for fuel oil only. The latest performance tests show that the emissions unit tested above 90% of permitted capacity. For wood only, the equivalent feed is 57 tons per hour (TPH), and the mill has operated up to 52 TPH feed to the #4 CB (March '04), which is ~91% of this equivalent rate.

4. RULE APPLICABILITY.

The existing facility is located in an area designated as Attainment for all pollutants pursuant to Rule 62-204.340, F.A.C. Therefore, the proposed project is subject to permitting under Rule 62-210.300, F.A.C.. Permits Required, Rule 62-210.300(a), F.A.C., Air Construction Permits, Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), Rule 62-212.400(2)(d), F.A.C., New and Modified Facilities, Rule 62-212.400(2)(d)4., F.A.C., Modifications to Major Facilities, Rule 62-212.400(2)(f), F.A.C., Pollutants Subject to PSD Preconstruction Review, Rule 62-212.400(2)(e)2.. F.A.C., Significant Net Emissions Increase, Rule 62-212.400(5), F.A.C., Preconstruction Review Requirements, and, Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT).

The permitting authority intends to issue this Air Construction Permit/PSD Permit based on the belief that reasonable assurances have been provided to indicate that the installation and operation of a new Bark Hog for the Bark Handling System will not adversely impact air quality; and, the affected Bark Handling System operation will be in compliance with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Fugitive VOC emissions are generated and released into the atmosphere from the outside storage and handling of the bark/wood prior to burning it in the #4 CB, with the majority of the emissions being emitted from the outside storage of the wood and bark chips. Total control of these fugitive emissions would entail the complete enclosure of the entire Bark Hog Handling System, including the bark/wood storage pile, and routing the emissions to a control device for burning. This approach is cost-prohibitive. Therefore, minimizing the exposure of the bark/wood prior to burning seems to be the most effective way to reduce fugitive VOC emissions from this operation, which is a best management approach to this operation.

The <u>only</u> pollutant that exceeds the significant level pursuant to Table 212.400-2 is volatile organic compounds (VOC) at a net of 300 tons per year (TPY) from the bark and wood chip pile. The total potential VOC emissions is estimated at 476 TPY. Therefore, the VOC emissions are required to undergo preconstruction evaluation pursuant to Rule 62-212.400(5), F.A.C., which includes a BACT determination requirement.

Best Available Control Technology (BACT) Determination for VOC

The VOC emissions are fugitive in nature and emanate from the total handling operation of wood and bark, with the majority of the emissions being emitted from the outside storage of wood and bark chips. Due to the nature of these emissions and the characteristics of the Bark Handling System, it is infeasible to control these emissions. To control these emissions would require complete enclosure of the entire Bark Handling System, including the outside bark and wood chip storage pile, and collecting and venting the emissions to a destruction device (probably a stand-

alone incinerator, a fossil fuel combustion device, or an existing boiler, if it can handle the volume of air from the collection system).

The existing bark and wood chip pile at the Palatka mill is approximately 400 feet long by 300 feet wide. To evaluate cost-effectiveness, a cost evaluation was done on an existing dome enclosure at a Jacksonville facility. The storage pile operation includes a stacker and reclaimer system. The dome covers coal and petcoke storage piles, is 400 feet in diameter by 140 feet high, and cost \$10 million. Just looking at the cost to cover the outside bark and wood chip storage pile (not including the additional VOC collection, venting and destruction systems), the cost to remove a ton of VOC is approximately \$21,000 (\$10 million/476). This seems to be impractical and cost prohibitive. In conclusion, the most practical approach to minimizing VOC emissions is to reduce the exposure of the wood and bark by employing a best management practice (BMP) approach to this operation. In addition, since wood/bark is a renewable energy source and fossil fuel is not, it is reasonable to assume that increasing the up-time of the Bark Handling System and providing a more steady state delivery of wood/bark to the #4 CB is a positive environmental benefit.

In conclusion, a BMP Plan to minimize VOC emissions from the outside storage of bark and wood chips shall be submitted to the Northeast District office for approval prior to the submission of an application for an operation permit (Title V Revision or Renewal) and shall be finalized and incorporated into the Title V Air Operation Permit.

5. AIR QUALITY ANALYSIS.

A. Analysis

According to the application, the proposed project will increase emissions of one pollutant in excess of PSD significant amounts: fugitive VOC. Potential VOC emissions increases are above the ambient impact analysis threshold of 100 TPY for the pollutant ozone. There is no PSD increment for VOC emissions. The ambient air quality standard (AAQS) for VOC is based on the ozone standard. The applicant presented potential VOC emissions increases to the Department, and discussed available options to predict potential impacts associated with the emissions and formation of ozone, since no stationary point source models are available and approved for use in predicting ozone impacts. Based on the available information, the Department has determined that the use of a regional model that incorporates the complex chemical mechanisms for predicting ozone formation is not suitable for this project.

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review unless otherwise exempted or satisfied. The monitoring requirement may be satisfied by using existing representative monitoring data, if available. Since VOC impacts from the project are predicted to be greater than the de minimis monitoring level of 100 TPY; the applicant is not exempt from preconstruction monitoring for this pollutant. The applicant may instead satisfy the preconstruction monitoring requirement using previously existing representative data. These data exist from ozone monitors located in Alachua County to the west and in Duval County to the north of the project and show no violations of the ozone standard. Additionally Florida has a fairly dense network of ozone monitors. Highest measured ozone values in Florida tend to be along the immediate coast; Palatka is inland. Elevated values measured at monitors in Duval, Volusia or Brevard counties along the immediate coast of Florida could indicate potentially elevated values at an inland site like Palatka. However, since these monitors have not been measuring values in violation of the ozone standard, then an inland site like Palatka would not be expected to show violations.

Because the AAQS are designed to protect both the public health and welfare and the project impacts are not expected to cause any violation of the AAQS, it is reasonable to assume the impacts on soils, vegetation, and wildlife will be minimal or insignificant. In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

Based on the required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment.

B. Conclusion

Based on the air quality analysis, the project will not significantly contribute to or cause any accidence of any ambient air quality standard, increment or visibility limit.

6. CONCLUSION.

Based on the foregoing technical evaluation, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The Draft air construction permit is attached.

Permit Engineer: Bruce Mitchell Meteorologist: Cleve Holladay

Reviewed and Approved by James K. Pennington, P.E.



Department of Environmental Protection

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

Colleen M. Castille Secretary

P.E. Certification Statement

Permittee: Georgia Pacific Corporation

DRAFT Permit No.: 1070005-028-AC / PSD-FL-341

Palatka Pulp and Paper Mill

Project: New Bark Hog and Clarification of Existing Permits

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This draft permit was prepared under my direct supervision by Mr. Bruce Mitchell of my staff.

ames K. Pennington, P.E.

Registration Number: 34536

11\23\0< Date

Permitting Authority:

Department of Environmental Protection Bureau of Air Regulation

Bureau of Air Regulation

111 South Magnolia Drive, Suite 4

Tallahassee, Florida 32301 Telephone: 850/488-0144

Fax: 850/922-6979



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

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This draft permit was prepared under my direct supervision by Mr. Bruce Mitchell of my staff.

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