



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MEMORANDUM

To: Bruce Mitchell - Florida Department of Environmental Protection

From: Jim Little - EPA Region 4 (404-562-9118)

Subj: Georgia-Pacific Palatka Mill Draft Permit

Date: May 23, 2007

Thank you for sending the draft prevention of significant deterioration permit (PSD-FL-380) and accompanying technical evaluation and preliminary determination for a modification of the Georgia-Pacific Consumer Operations mill in Palatka, Florida. These documents are detailed and well written. We have only the following brief comments. The terms "we" and "our" in these comments refer to the Region 4 office of the U.S. Environmental Protection Agency (EPA).

1. Particulate Matter - $PM_{2.5}$ is a regulated new source review (NSR) pollutant that will be emitted from the modified emissions units. The only reference we see to $PM_{2.5}$ is in the best available control technology (BACT) section of the preliminary determination on page 7 where this statement appears: "Throughout the BACT analysis, the Department will use PM emissions as a surrogate to also reduce $PM_{2.5}$ and PM_{10} emissions." We first note that current EPA guidance is to use PM_{10} as a surrogate for $PM_{2.5}$. Second, we recommend that a statement about $PM_{2.5}$ be added to the final determination indicating that a surrogate approach was used for the air quality analysis as well as for the BACT analysis.
2. Compliance Averaging Period for Carbon Monoxide Emissions Limit - The compliance averaging period for the No. 4 Recovery Boiler carbon monoxide (CO) emissions limit is a 30-day rolling average. Our usual preference is (a) for at least one emissions limit for a given pollutant to be equal to the emissions rate used for air quality impact modeling purposes and (b) for the compliance averaging period associated with this limit to be generally consistent with the modeled averaging period(s). For CO, the modeled averaging periods were 1-hour and 8-hour averaging periods, not a 30-day period. In this case, however, we recognize that modeled CO concentrations are far below the reference values used to assess the modeling results and that the CO emissions limits for other emissions units affected by the project are short-term limits.

3. Netting Analysis - A netting analysis was performed for this project to demonstrate that several regulated NSR pollutants are not subject to PSD review. For an emissions decrease to be creditable in a PSD netting analysis, it must have “approximately the same qualitative significance for public health and welfare as that attributed to the increase from the particular change [Florida Regulation 62-210.200(209)(f)3]. We understand that the Department took this requirement into account when excluding pollutants from PSD review based on netting.

Mitchell, Bruce

From: Little.James@epamail.epa.gov
Sent: Wednesday, May 23, 2007 1:44 PM
To: Mitchell, Bruce
Subject: Minor Items on G-P Palatka

Bruce -

Your preliminary determination and draft permit for Georgia-Pacific Palatka were excellent. I probably will send a couple of "official" comments in a separate e-mail message. While I finish those, here are some minor items for your use.

The table that starts at the bottom of page 5 of the preliminary determination and carries over to page 6 has footnote superscripts "1" and "4" in some of the column headings. However, I do not see any footnotes after the table where they would normally appear.

On page 13 of the draft permit under EXISTING APPLICABLE REGULATIONS, Item 2. (related to NSPS), I believe "NESHAP Subpart BB of 40 CFR 63" on the second line should be "NSPS Subpart BB of 40 CFR 60."

On page E-1 (Appendix E) of the draft permit, the last line of the table on that page has "VOC" with a footnote superscript "e." I see footnotes a. through d. (on page E-2), but I don't see footnote e.

Jim Little - EPA Region 4
(404) 562-9118

Mitchell, Bruce

From: Little.James@epamail.epa.gov
Sent: Wednesday, May 23, 2007 4:42 PM
To: Mitchell, Bruce
Subject: Comments on Georgia-Pacific Palatka Draft PSD Permit

Attachments: G-P Palatka - Region 4 Comments PSD-FL-380.doc



G-P Palatka -
Region 4 Comment..

Bruce -

Attached are Region 4's comments on the Georgia-Pacific Palatka mill draft PSD permit.
Please call me if you have any questions.

Jim Little - U.S. EPA Region 4
(404) 562-9118

(See attached file: G-P Palatka - Region 4 Comments PSD-FL-380.doc)



Palatka Pulp and Paper Operations
Consumer Products Division

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

May 7, 2007

Mr. Christopher L. Kirts, P.E.
District Air Program Administrator
State of Florida
Department of Environmental Protection
7825 Baymeadows Way Suite B200
Jacksonville, FL 32256-7590

RE: Draft Air Permit No. PSD-FL-380
Project No. 1070005-038-AC
Georgia-Pacific Consumer Products LLC – Palatka Mill
Modification of No. 5 Power Boiler, No. 4 Lime Kiln, No. 4 Recovery Boiler, and
No. 4 Multiple Effect Evaporators

Dear Mr. Kirts:

Georgia-Pacific Consumer Products LLC (GP) has received the Florida Department of Environmental Protection's (DEP's) subject draft permit package dated April 13, 2007, and offers the following comments organized by document, section, and page number as appropriate:

Draft Permit

Section 3. Emissions Unit Specific Conditions:

Part C. No. 4 Lime Kiln,

Page 10 of 17, Condition 5 – Permitted Capacity:

Comment: The "material" that is limited to 41.5 tons/hr should be identified instead as "lime mud solids" for clarity.

Page 11 of 17, Condition 9 – PM Standard:

Comment: As with the previous comment, the standard would be more correctly stated in terms of: "lb per ton of lime mud solids processed".

Page 12 of 17, Condition 22 – Records and Reports, Kiln Process Rate

Comment: Revise to state that lime mud "solids" input shall be monitored and recorded, in order to be consistent with above comments.

Discussion: Lime Mud flow and density (% solids) to the lime kiln are monitored on a continuous basis. This data is averaged hourly and converted to tons per hour of lime mud solids. The proposed revisions will serve to more accurately describe the material input to the kiln and clarify that it is measured on a dry basis.

Page 12 of 17, Condition 20 – Fuel monitoring:

Comment and Discussion: This condition is a duplicate of condition 16, page 9, in section B. (No. 5 Power Boiler) and is not applicable to the lime kiln. This condition should be deleted from the lime kiln section. Lime kiln fuel records are addressed in condition 23 (page 12).

Part D, No. 4 Recovery Boiler

Pages 13 & 14 of 17, Condition 6 – Capacities, Fuels, and Restrictions:

Comment: Permitting Note at the end of this condition should be revised to note that the identified heating value of BLS is an average value. (suggested change: *The maximum heat input from firing BLS is 1345 MMBtu/hour based on the permitted capacity and an average heating value of 6410 Btu/lb of BLS.*)

Page 14, Condition 8 – CEMS:

Comment and Discussion: The condition requires installation of continuous monitors to determine the flue gas oxygen content and exhaust flow rate. The boiler currently has a stack O₂ monitor that is used in conjunction with the TRS and SO₂ CEMS. GP would utilize the existing stack O₂ monitor to meet this requirement. Additionally, in lieu of the cost of installation and maintenance of a stack flow CEMS, GP would prefer to have the flexibility to develop a site-specific F-factor using stack test data and process information to establish a correlation between stack flow rate and other parameters, such as BLS firing rate, or to establish a maximum flow rate to be used for mass flow compliance calculations.

Mr. Christopher L. Kiris, P.E.
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5/7/2007

I, the undersigned, am the responsible official of the source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and the data contained in this document are true, accurate, and complete.

If you have any questions regarding this correspondence, please contact Ron Reynolds at (386) 325-2001, ext. 4672.

Sincerely,



Keith Wahoske
Vice President

cc: B. T. Champion, Atlanta
S. D. Matchett, Atlanta
W. Galler, Atlanta
T. Wyles, Atlanta
M.W. Curtis, Palatka
R.E. Reynolds, Palatka