



# Florida Department of Environmental Protection

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## PERMITTEE

Georgia-Pacific Consumer Operations LLC  
P. O. Box 919  
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Authorized Representative:  
Mr. Keith Wahoske, Vice President of Palatka Operations

Air Permit No. 1070005-050-AC Permit Expires: October 1, 2008 Georgia-Pacific Palatka Mill ARMS ID No. 1070005 No. 4 Recovery Boiler Revisions for SO <sub>2</sub> and Oil Firing
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## PROJECT AND LOCATION

This permit authorizes revisions to the SO<sub>2</sub> limits and oil firing restrictions for the No. 4 Recovery Boiler (EU-018), which is located at the existing Palatka pulp and paper mill (SIC Nos. 2611 and 2621) in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. The map coordinates are UTM Zone 17, 434.0 km East and 3283.4 km North.

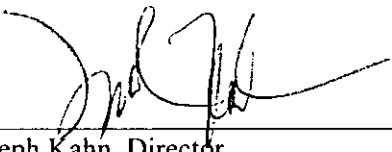
## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

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- Section 2. Administrative Requirements
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Executed in Tallahassee, Florida

  
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Joseph Kahn, Director  
Division of Air Resource Management

1/31/08  
(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

Georgia-Pacific operates an existing paper and pulp mill in Palatka, Florida using the Kraft sulfate process. In the Kraft process, the digesting liquor (white liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to convert the green liquor to cooking liquor. Other steam and energy needs are met by the power boilers, which burn a variety of fuels including fuel oil and natural gas.

### REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, F.A.C.

### PROJECT DESCRIPTION

This permit revises the sulfur dioxide (SO<sub>2</sub>) emissions limits and oil firing specifications for the No. 4 recovery boiler at the Palatka Mill. In Project No. 1070005-038-AC (PSD-FL-380), Georgia-Pacific requested clarification of the SO<sub>2</sub> emissions standards and oil firing restrictions for the No. 4 Recovery Boiler (EU-018), which fires No. 6 fuel oil with a maximum sulfur content of 2.35% by weight. Prior to issuance of Permit No. PSD-FL-380, the request was split off along with the project to modify the No. 4 combination boiler as Project No. 1070005-045-AC (PSD-FL-393). For clarity, this project is now being issued as a separate minor source air construction permit (Project No. 1070005-050-AC) to address only the oil firing and SO<sub>2</sub> conditions for the No. 4 Recovery Boiler.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (DEP). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office. The mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida, 32256. The phone number is 904/807-3300.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms), Appendix B (General Conditions), Appendix C (Common Conditions) and Appendix D (CEMS Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. Also, at such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

This section of the permit addresses the following emissions unit.

EU No.	Description
018	<p><b>No. 4 Recovery Boiler.</b> As part of the recovery process at the mill, this unit fires black liquor solids (BLS) to recover the cooking liquor. The permitted capacity is 210,000 lb/hour of BLS based on a 24-hour average (equivalent to 1345 MMBtu/hour based on the permitted capacity and an average heating value of 6410 Btu/lb of BLS). Residual fuel oil is fired as a startup, shutdown and supplemental fuel. The maximum steam production rate is 789,000 lb/hour (24-hour average) for steam conditions of 850° F to 900° F at 1250 psi. Particulate matter emissions are controlled by an electrostatic precipitator (ESP) with automatic voltage control, 2-chambers, and 6 electric fields per chamber. Total reduced sulfur (TRS) emissions are controlled by the low-odor boiler design. Emissions of nitrogen oxides (NO<sub>x</sub>) are controlled by a four-level overfire air system. Emissions of carbon monoxide (CO) and volatile organic compounds (VOC) are controlled by the combustion design and good operating practices. The following pollutants are monitored with continuous emissions monitoring systems (CEMS): CO, NO<sub>x</sub>, SO<sub>2</sub>, TRS and opacity. At permitted BLS capacity, the exhaust gas flow rate is 294,000 dscfm at 8% oxygen with an exit temperature of 400° F. Exhaust gases exit a stack that is 12 feet in diameter and 230 feet tall.</p>

The following conditions related to SO<sub>2</sub> emissions and oil firing requirements replace all other similar conditions in previously issued air construction permits.

**OIL FIRING CAPACITIES**

1. Permitted Oil Firing Capacity. The following table specifies the capabilities of the oil firing system designed by Combustion Engineering:

Burner Type	Quantity	Oil Pressure	Maximum Design Capacities			
			Oil Firing Rate (gph)		Heat Input Rates (MMBtu/hour)*	
			Each Burner	Total	Each Burner	Total
Startup Burners	4	88 psig	250	1000	37.5	150
Load Burners	8	80 psig	480	3840	72	576

\* For No. 6 fuel oil, assumes a heating value of 150,000 Btu/gallon and a density of 8.2 lb/gallon.

Any changes to the design or operation of the oil firing system shall require a modification of this permit and a corresponding PSD applicability determination. [Design and Rule 62-210.200(PTE), F.A.C.]

**PERFORMANCE RESTRICTIONS**

2. Oil Firing Restrictions.
  - a. The No. 4 Recovery Boiler is authorized to fire No. 6 fuel oil with a maximum sulfur content of 2.35% by weight as determined by the method specified in this permit.
  - b. The No. 4 Recovery Boiler shall not fire more than 67,680 gallons of fuel oil during any consecutive rolling 24 hours. *{Permitting Note: This is equivalent to a 24-hour average of 47 gpm, which was the basis of the air quality analysis for ensuring compliance with the Ambient Air Quality Standards.}*
  - c. The heat input rate to the No. 4 Recovery Boiler from firing oil shall be less than 1,178,220 MMBtu during any consecutive 12 months. *{Permitting Note: This represents an annual capacity factor of less than 10% of the maximum annual heat input rate of the unit.}*

[Rules 62-4.070(3) and 62-212.300, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### SO<sub>2</sub> EMISSIONS STANDARDS

3. SO<sub>2</sub> Emissions Standards. As determined by CEMS, SO<sub>2</sub> emissions from the No. 4 Recovery Boiler shall not exceed 100 ppmvd at 8% O<sub>2</sub> based on a 24-hour rolling average. This emissions standard includes all valid SO<sub>2</sub> CEMS data collected except during periods of boiler startup and shutdown. *{Permitting Note: The limit of 100 ppmvd corrected to 8% oxygen is equivalent to 292.8 lb/hour. This limit is based on the PSD modeling analysis for PSD-FL-380 and PSD-FL-393.}* [Rules 62-4.070(3), 62-210.200(PTE) and 62-212.400(12), F.A.C.]
4. SO<sub>2</sub> Emissions Cap. As determined by all valid CEMS data, SO<sub>2</sub> emissions from the No. 4 Recovery Boiler shall not exceed 153.9 tons during any consecutive 12 months. This emissions cap includes valid SO<sub>2</sub> CEMS data collected including all periods of startup, shutdown, malfunction and oil firing. *{Permitting Note: The purpose of this emissions cap is to avoid PSD preconstruction review for PSD-FL-380 and PSD-FL-393.}* [Rules 62-4.070(3), 62-210.200(PTE) and 62-212.400(12), F.A.C.]

### MONITORING REQUIREMENTS

5. SO<sub>2</sub> CEMS. The permittee shall properly install, calibrate, operate and maintain a CEMS to measure and record SO<sub>2</sub> emissions to demonstrate compliance with the standards specified in this permit. The CEMS shall include the measurement of oxygen (or carbon monoxide) for correction of SO<sub>2</sub> emission concentrations to 8% oxygen. The CEMS shall comply with the applicable requirements of Performance Specification 2 in Appendix B of 40 CFR Part 60 and the quality assurance procedures in Appendix F of 40 CFR Part 60. The permittee shall comply with the conditions of Appendix D (CEMS Requirements) of this permit. [Rule 62-4.070(3), F.A.C.]
6. SO<sub>2</sub> CEMS Data Substitution. The following procedures shall be used for missing data.
  - a. SO<sub>2</sub> 24-hour Rolling Average. No data shall be substituted for the missing data to determine compliance with the standard based on 24-hour rolling average. The next valid 1-hour emissions average shall be used to complete the 24-hour rolling average.
  - b. SO<sub>2</sub> Emissions Cap. All valid CEMS data shall be used to determine compliance with the SO<sub>2</sub> emissions cap. This includes periods of startup, shutdown, malfunction, oil firing and operation while firing BLS. For periods of missing data, the permittee shall calculate the maximum 24-hour rolling average for each method of operation (e.g., startup, shutdown, malfunction, oil firing and operation while firing BLS). For the 12-month period, this average shall be substituted for each missing 1-hour emissions average under the given method of operation.  
  
[Rule 62-4.070(3), F.A.C.]
7. CEMS Required for Reporting Annual Emissions. The permittee shall use SO<sub>2</sub> data from the CEMS when calculating annual emissions for purposes of computing actual emissions, baseline actual emissions and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for purposes of computing emissions pursuant to the reporting requirements of Rules 62-210.370(3) and 62-212.300(1)(e), F.A.C. The permittee shall follow the procedures in Appendix D (CEMS Requirements) of this permit for calculating annual emissions. [Rule 62-4.070(3), F.A.C.]

### RECORDS AND REPORTS

8. Fuel Oil Sulfur Records. The permittee shall maintain the following records of the sulfur content of fuel oil fired in the No. 4 Recovery Boiler.
  - a. For each delivery of fuel oil, the permittee shall maintain a permanent file of the certified fuel analysis from the vendor identifying the fuel sulfur content and heating value.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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- b. The permittee shall demonstrate compliance with the maximum permitted fuel sulfur specification based on a 3-barge rolling average. The permittee shall maintain records of the fuel analysis for each fuel oil shipment received. The permittee shall calculate and maintain a log of the fuel sulfur content based on a 3-barge rolling average (i.e., the average of three consecutive barge deliveries based on the certified fuel oil analysis receipt). Fuel oil analysis shall be conducted using ASTM Methods D-129, D-1552, D-2622, D-4294 or equivalent methods approved by the Department. If the calculated 3-barge rolling average exceeds the permitted maximum fuel sulfur content, the permittee shall notify the Compliance Authority within one working day.
- c. Before April 1<sup>st</sup> of each year, the permittee shall submit an annual report summarizing the fuel oil deliveries and the 3-barge rolling averages of the fuel sulfur content for operations during the previous calendar year.

[Rule 62-4.070(3), F.A.C.]

9. Fuel Oil Firing Records. The permittee shall operate and maintain an oil flow monitoring system to determine compliance with the oil firing limitations for the No. 4 Recovery Boiler (gallons per consecutive rolling 24-hour period and MMBtu per consecutive rolling 12-month period). [Rules 62-4.160(15) and 62-4.070(3), F.A.C.]

**SECTION 4. APPENDICES**  
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**SECTION 4. APPENDIX A**  
**CITATION FORMATS AND GLOSSARY OF COMMON TERMS**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit  
"AO" identifies the permit as an Air Operation Permit  
"123456" identifies the specific permit project number

**New Permit Numbers**

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located  
"2222" represents the specific facility ID number for that county  
"001" identifies the specific permit project number  
"AC" identifies the permit as an air construction permit  
"AF" identifies the permit as a minor source federally enforceable state operation permit  
"AO" identifies the permit as a minor source air operation permit  
"AV" identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
"FL" means that the permit was issued by the State of Florida  
"317" identifies the specific permit project number

**Florida Administrative Code (F.A.C.)**

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department's database)

BACT: best available control technology

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CO: carbon monoxide

COMS: continuous opacity monitoring system



## SECTION 4. APPENDIX A

### CITATION FORMATS AND GLOSSARY OF COMMON TERMS

<b>DEP:</b> Department of Environmental Protection	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>Department:</b> Department of Environmental Protection	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>dscfm:</b> dry standard cubic feet per minute	<b>NSPS:</b> New Source Performance Standards
<b>EPA:</b> Environmental Protection Agency	<b>O&amp;M:</b> operation and maintenance
<b>ESP:</b> electrostatic precipitator	<b>O<sub>2</sub>:</b> oxygen
<b>EU:</b> emissions unit	<b>Pb:</b> lead
<b>F.A.C.:</b> Florida Administrative Code	<b>PM:</b> particulate matter
<b>F.D.:</b> forced draft	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>F.S.:</b> Florida Statutes	<b>PSD:</b> prevention of significant deterioration
<b>FGR:</b> flue gas recirculation	<b>psi:</b> pounds per square inch
<b>Fl:</b> fluoride	<b>PTE:</b> potential to emit
<b>ft<sup>2</sup>:</b> square feet	<b>RACT:</b> reasonably available control technology
<b>ft<sup>3</sup>:</b> cubic feet	<b>RATA:</b> relative accuracy test audit
<b>gpm:</b> gallons per minute	<b>SAM:</b> sulfuric acid mist
<b>gr:</b> grains	<b>scf:</b> standard cubic feet
<b>HAP:</b> hazardous air pollutant	<b>scfm:</b> standard cubic feet per minute
<b>Hg:</b> mercury	<b>SIC:</b> standard industrial classification code
<b>I.D.:</b> induced draft	<b>SNCR:</b> selective non-catalytic reduction
<b>ID:</b> identification	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>kPa:</b> kilopascals	<b>TPH:</b> tons per hour
<b>lb:</b> pound	<b>TPY:</b> tons per year
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

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 these 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 and 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 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 no 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 not 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 permittee to cause pollution in contravention of F.S. 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 or 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 and records 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 noncompliance, 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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S.. Such evidence

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. 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:
  - a. Determination of Best Available Control Technology;
  - b. Determination of Prevention of Significant Deterioration; and
  - c. Compliance with New Source Performance Standards.
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 or 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:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) 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.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**RECORDS AND REPORTS**

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]

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## SECTION 4. APPENDIX D.

### CEMS Requirements

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#### INSTALLATION, PERFORMANCE SPECIFICATIONS AND QUALITY ASSURANCE

1. **Timelines:** The owner or operator shall install the CEMS required by this permit and conduct the appropriate performance specification for each CEMS in accordance with the provisions in Permit No. PSD-FL-380 (1070005-038-AC).
2. **Installation:** All CEMS shall be installed such that representative measurements of emissions or process parameters from the facility are obtained. The owner or operator shall locate the CEMS by following the procedures contained in the applicable performance specification of 40 CFR part 60, Appendix B.
3. **Span Values and Dual Range Monitors:** The owner or operator shall set appropriate span values for the CEMS. The owner or operator shall install dual range monitors if necessary.
4. **Continuous Flow Monitor:** For compliance with mass emission rate standards, the owner or operator shall install a continuous flow monitor to determine the stack exhaust flow rate. The flow monitor shall be certified pursuant to 40 CFR part 60, Appendix B, Performance Specification 6. Alternatively, the owner or operator may install a fuel flow monitor and use an appropriate F-Factor computational approach to calculate stack exhaust flow rate.
5. **Diluent Monitor:** If it is necessary to correct the CEMS output to the oxygen concentrations specified in this permit's emission standards, the owner or operator shall either install an oxygen monitor or install a CO<sub>2</sub> monitor and use an appropriate F-Factor computational approach.
6. **Moisture Correction:** If necessary, the owner or operator shall determine the moisture content of the exhaust gas and develop an algorithm to enable correction of the monitoring results to a dry basis (0% moisture).
7. **Performance Specifications:** The owner or operator shall evaluate the acceptability of the SO<sub>2</sub> CEMS by conducting Performance Specification 2 of 40 CFR part 60, Appendix B. CEMS determined to be unacceptable shall not be considered installed for purposes of meeting the timelines of this permit.
8. **Quality Assurance:** The owner or operator shall follow the quality assurance procedures of 40 CFR part 60, Appendix F. The required RATA tests for the SO<sub>2</sub> CEMS shall be performed using EPA Method 6C in Appendix A of 40 CFR part 60.

#### CALCULATION APPROACH

9. **CEMS Used for Compliance:** Once adherence to the applicable performance specification for each CEMS is demonstrated, the owner or operator shall use the CEMS to demonstrate compliance with the applicable emission standards as specified by this permit.
10. **CEMS Data:** Each CEMS shall monitor and record emissions during all periods of operation and whenever emissions are being generated, including during episodes of startups, shutdowns, and malfunctions. All data shall be used, except for invalid measurements taken during monitor system breakdowns, repairs, calibration checks, zero adjustments and span adjustments, and except for allowable data exclusions as per this appendix.
11. **Operating Hours and Operating Days:** For purposes of this appendix, the following definitions shall apply. An hour is the 60-minute period beginning at the top of each hour. Any hour during which an emissions unit is in operation for more than 15 minutes is an operating hour for that emission unit. A day is the 24-hour period from midnight to midnight. Unless otherwise specified by this permit, any day with at least one operating hour for an emissions unit is an operating day for that emission unit.
12. **Valid Hourly Averages:** Each CEMS shall be designed and operated to sample, analyze and record data evenly spaced over the hour at a minimum of one measurement per minute. All valid measurements collected during an hour shall be used to calculate a 1-hour block average that begins at the top of each hour.
  - a. Hours that are not operating hours are not valid hours.
  - b. For each operating hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, there is insufficient data, the 1-hour block average is not valid, and the hour is considered as "monitor unavailable."

## SECTION 4. APPENDIX D.

### CEMS Requirements

13. Calculation Approaches: The owner or operator shall implement the calculation approach specified by this permit for each CEMS, as follows:
- Rolling 24-hour average*. Compliance shall be determined after each valid hourly average is obtained by calculating the arithmetic average of that valid hourly average and the prior 23 valid hourly averages.
  - Rolling 12-month total*. Compliance shall be determined after each operating month by calculating the arithmetic total of all the valid emission data collected during the consecutive 12-month period.

### MONITOR AVAILABILITY

14. Monitor Availability: The quarterly excess emissions report shall identify monitor availability for each quarter in which the unit operated. Monitor availability for the CEMS shall be 95% or greater in any calendar quarter in which the unit operated for more than 760 hours. In the event the applicable availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving the required availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

### EXCESS EMISSIONS

15. Definitions:
- Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
  - Shutdown* means the cessation of the operation of an emissions unit for any purpose.
  - Malfunction* means any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.
16. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
17. Notification Requirements: The owner or operator shall notify the Compliance Authority within one working day of discovering any emissions that demonstrate noncompliance for a given averaging period.

### ANNUAL EMISSIONS

18. CEMS Used for Calculating Annual Emissions: All valid data, as defined in this appendix, shall be used when calculating annual emissions.
- Annual emissions shall include data collected during startup, shutdown and malfunction periods.
  - Annual emissions shall include data collected during periods when the emission unit is not operating but emissions are being generated (for example, when firing fuel to warm up a process for some period of time prior to the emission unit's startup).
  - Annual emissions shall not include data from periods of time where the monitor was functioning properly but was unable to collect data while conducting a mandated quality assurance/quality control activity such as calibration error tests, RATA, calibration gas audit or RAA. These periods of time shall be considered missing data for purposes of calculating annual emissions.
  - Annual emissions shall not include data from periods of time when emissions are in excess of the calibrated span of the CEMS. These periods of time shall be considered missing data for purposes of calculating annual emissions.
19. Emissions Calculation: Hourly emissions shall be calculated for each hour as the product of the 1-hour block average and the duration of pollutant emissions during that hour. Annual emissions shall be calculated as the sum of all hourly emissions occurring during the year.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

*In the Matter of an  
Application for Permit by:*

Georgia-Pacific Consumer Operations LLC  
P. O. Box 919  
Palatka, Florida 32178-0919

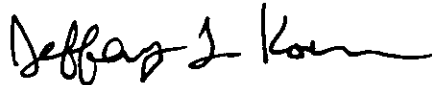
Authorized Representative:  
Mr. Keith Wahoske, Vice President of Palatka Operations

Air Permit No. 1070005-050-AC  
Georgia-Pacific Palatka Mill  
ARMS ID No. 1070005  
No. 4 Recovery Boiler  
Revisions for SO<sub>2</sub> and Oil Firing

Enclosed is the final air construction permit, which authorizes revisions to the SO<sub>2</sub> limits and oil firing restrictions for the No. 4 Recovery Boiler (EU-018). This unit is located at the existing Palatka pulp and paper mill (SIC Nos. 2611 and 2621) in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. As noted in the attached final determination, no comments were received on the draft permit. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

FOS

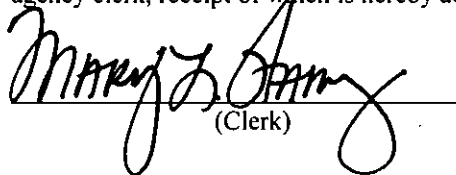
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination) was sent by electronic mail with received receipt requested to the persons listed below.

Mr. Keith Wahoske, Georgia-Pacific ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))  
Mr. Mike Curtis, Georgia-Pacific ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))  
Mr. Christopher Kirts, NED Office ([Christopher.Kirts@dep.state.fl.us](mailto:Christopher.Kirts@dep.state.fl.us))

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.



(Clerk)

1/31/08  
(Date)

## Memorandum

## Florida Department of Environmental Protection

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TO: Joseph Kahn, Division of Air Resource Management  
THROUGH: Trina Vielhauer, Bureau of Air Regulation  
FROM: Jeff Koerner, New Source Review Section *JK*  
DATE: January 29, 2008  
SUBJECT: Final Air Permit No. 1070005-050-AC  
Georgia-Pacific Palatka Mill  
No. 4 Recovery Boiler, SO<sub>2</sub> and Oil Firing Revisions

The final permit clarifies the oil firing conditions and corrects the SO<sub>2</sub> standard that applies when firing black liquor solids in the No. 4 recovery boiler. Annual SO<sub>2</sub> emissions remain capped at 153.9 tons during any consecutive 12 months with compliance demonstrated by CEMS. The project is subject to minor source preconstruction review.

I recommend your approval of the attached Final Permit.

Attachments



## FINAL DETERMINATION

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### PERMITTEE

Georgia-Pacific Consumer Operations LLC  
P. O. Box 919  
Palatka, Florida 32178-0919

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. 1070005-050-AC  
Georgia-Pacific Palatka Mill

The permit authorizes revisions to the SO<sub>2</sub> limits and oil firing restrictions for the No. 4 Recovery Boiler (EU-018), which is located at the existing Palatka pulp and paper mill (SIC Nos. 2611 and 2621) in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida.

### NOTICE AND PUBLICATION

The Department electronically distributed an Intent to Issue Permit package on December 19, 2007. The applicant published the Public Notice of Intent to Issue in the Palatka Daily News on January 4, 2008. The Department received the proof of publication on January 10, 2008.

### COMMENTS

No comments on the draft permit were received from the public, the Department's Northeast District office or the applicant. There were no requests for an administrative hearing.

### CONCLUSION

The final action of the Department is to issue the permit as drafted.

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Thursday, January 31, 2008 3:27 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific'; 'Mr. Mike Curtis, Georgia-Pacific'; Kirts, Christopher  
**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia Pacific Consumer Operations - Facility ID #1070005-050  
**Attachments:** 1070005-050-AC - Appendix.PDF; 1070005-050-AC - Final Determination.PDF; 1070005-050-AC - Final Permit.PDF; 1070005-050-AC - Notice of Final Permit.PDF; Signed Document - 1070005-050-AC-FINAL.pdf

**Tracking:**

Recipient	Read
Mr. Keith Wahoske, Georgia-Pacific	
Mr. Mike Curtis, Georgia-Pacific	
Kirts, Christopher	Read: 2/1/2008 9:36 AM
Koerner, Jeff	
Walker, Elizabeth (AIR)	Read: 2/1/2008 7:56 AM
Gibson, Victoria	Read: 1/31/2008 3:28 PM

Dear Sir/Madam:

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

2/4/2008

## Harvey, Mary

---

**From:** Kirts, Christopher  
**To:** Harvey, Mary  
**Sent:** Friday, February 01, 2008 9:36 AM  
**Subject:** Read: Georgia Pacific Consumer Operations - Facility ID #1070005-050

Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific'; 'Mr. Mike Curtis, Georgia-Pacific'; Kirts, Christopher  
**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia Pacific Consumer Operations - Facility ID #1070005-050  
**Sent:** 1/31/2008 3:27 PM

was read on 2/1/2008 9:36 AM.

## Harvey, Mary

---

**From:** Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, January 31, 2008 7:39 PM  
**Subject:** Read: Georgia Pacific Consumer Operations - Facility ID #1070005-050

Your message

**To:** MICHAEL.CURTIS@GAPAC.com  
**Subject:**

was read on 1/31/2008 7:39 PM.

## Harvey, Mary

---

**From:** ~~Walker, Elizabeth (AIR)~~  
**To:** Harvey, Mary  
**Sent:** Friday, February 01, 2008 7:56 AM  
**Subject:** Read: Georgia Pacific Consumer Operations - Facility ID #1070005-050

### Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific'; 'Mr. Mike Curtis, Georgia-Pacific'; Kirts, Christopher  
**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia Pacific Consumer Operations - Facility ID #1070005-050  
**Sent:** 1/31/2008 3:27 PM

was read on 2/1/2008 7:56 AM.

**Harvey, Mary****From:** ~~Wahoske, Keith~~ [KEITH.WAHOSKE@GAPAC.com]**Sent:** Thursday, January 31, 2008 4:20 PM**To:** Harvey, Mary; Curtis, Michael; Kirts, Christopher**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria**Subject:** RE: Georgia Pacific Consumer Operations - Facility ID.#1070005-050

We are in receipt of your email.

Thank you

Keith Wahoske

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

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]**Sent:** Thursday, January 31, 2008 3:27 PM**To:** Wahoske, Keith; Curtis, Michael; Kirts, Christopher**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Gibson, Victoria**Subject:** Georgia Pacific Consumer Operations - Facility ID #1070005-050

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Georgia Pacific Consumer Operations - Facility ID #1070005-050

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Please send a "reply" message verifying receipt of the attached document(s). This message

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