

# Memorandum

# Florida Department of Environmental Protection

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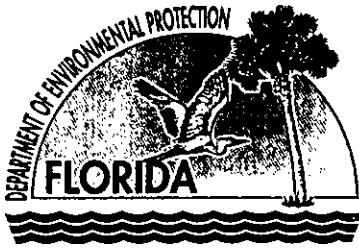
TO: Trina Vielhauer, Chief - Bureau of Air Regulation  
THROUGH: Jeff Koerner, Administrator, New Source Review Section *JK*  
FROM: Bruce Mitchell *BM*  
DATE: June 11, 2007  
SUBJECT: Draft Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Georgia-Pacific Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination (with BACT Determination);
- Draft PSD Permit Revision; and
- P.E. Certification

The P.E. certification briefly summarizes the proposed permit project. The Technical Evaluation and Preliminary Determination provide a detailed description of the project, rationale, and conclusion. I recommend your approval of the attached Draft Permit for this project.

Attachments



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

June 20, 2008

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

Re: Draft Air Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Georgia-Pacific Consumer Operations LLC – Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

Dear Mr. Wahoske:

On April 14, 2008, you submitted an application requesting authorization to install a "Consumed Air" process control system for the No. 4 Recovery Boiler at the Palatka Mill. This facility is located North of CR 216 and West of US 17 in Palatka, Putnam County, Florida. Enclosed are the following documents:

- Technical Evaluation and Preliminary Determination;
- Draft Permit Revision and Appendices;
- Written Notice of Intent to Issue Air Permit Revision; and
- Public Notice of Intent to Issue Air Permit Revision.

The Public Notice of Intent to Issue Air Permit Revision is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

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

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

*Authorized Representative:*  
Mr. Keith Wahoske  
Vice President – Palatka Operations

Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project  
Putnam County, Florida

**Facility Location:** Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

**Project:** The applicant proposes to install a new automated control system to make the No. 4 Recovery Boiler more efficient in order to generate more steam from each pound of black liquor solids burned in the boiler. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Revision, 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 or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate 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 Revision in accordance with the conditions of the proposed Draft Permit Revision 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.

**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 Revision (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 above address or phone number. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 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.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. 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. All comments filed will be made available for public inspection.

**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

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

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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 14 days of receipt of this Written Notice of Intent to Issue Air Permit Revision. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit Revision, 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 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 (in a proceeding initiated by another party) 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; 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 when and how each petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Revision. 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.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION**

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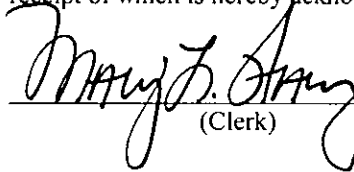
**CERTIFICATE OF SERVICE**

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 electronic mail with received receipt requested before the close of business on 6/20/08 to the persons listed below.

- Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))
- Mr. Christopher Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))
- Mr. Dee Morse, National Park Service ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

6/20/08  
\_\_\_\_\_  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Project No. 1070005-053-AC  
Draft Air Permit Revision No. PSD-FL-380(B)  
Georgia-Pacific Consumer Operations LLC – Palatka Mill  
Putnam County, Florida

**Applicant:** The applicant for this project is the Georgia-Pacific Consumer Operations LLC. The applicant's authorized representative and mailing address is: Mr. Keith Wahoske, Vice President – Palatka Operations, Georgia-Pacific Consumer Operations LLC, P.O. Box 919, Palatka, Florida 32178-0919.

**Facility Location:** Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

**Project:** The applicant requests authorization to install a "Consumed Air" process control system on the No. 4 Recovery Boiler to improve combustion and efficiency of the unit. The proposed new control package will reduce variation in the combustion process by increasing and decreasing the amount of black liquor solids (BLS) to the boiler to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. Air permit No. PSD-FL-380(A) will be revised to include this minor change.

**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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Revision, 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. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

**Notice of Intent to Issue Air 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 appropriate 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 Revision in accordance with the conditions of the proposed Draft Permit Revision 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 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. 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. All comments filed will be made available for public inspection.

**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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, 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 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to

**(Public Notice to be Published in the Newspaper)**

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

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 (in a proceeding initiated by another party) 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; 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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Public Notice of Intent to Issue Air Permit Revision. 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 for this proceeding.

**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Draft Air Construction Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
No. 4 Recovery Boiler, Consumed Air Project

**COUNTY**

Putnam County

**APPLICANT**

Georgia-Pacific Consumer Operations LLC  
Palatka Mill  
ARMS Facility ID No. 1070005

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section



June 20, 2008

*{Filename: 1070005.053.AC.PSD.FL.380(B).TEPD}*



# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## 1. GENERAL PROJECT INFORMATION

### Facility Description and Location

The facility is an existing pulp and paper mill, which is categorized under Standard Industrial Classification Code SIC Nos. 2611 and 2621. The UTM coordinates are Zone 17, 434.0 km East, and 3283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS) pursuant to Chapter 62-204, Florida Administrative Code (F.A.C.).

### Facility Regulatory Categories

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

Title IV: The existing facility has 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 Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

### Project Description

The applicant requested authorization to install a "Consumed Air" process control system on the existing No. 4 Recovery Boiler. The purpose is to make the boiler more efficient in order to generate more steam from each pound of black liquor solids burned in the boiler. The project is expected to increase steam generation by approximately 6,000 pounds per hour for the same black liquor firing rate.

Currently, black liquor flow is controlled as a constant volumetric feed rate to the boiler. Combustion air is fixed at a desired set point at each of the four levels in the boiler. Variations in black liquor solids content, black liquor temperature, black liquor heating value and excess air are not taken into account with the present control system, which has caused variations in the combustion process. The combustion variability shows up in the amount of steam produced per pound of black liquor solids fired in the boiler.

The proposed new control package will reduce variation in the combustion process and increase steam generation per pound of black liquor solids. The consumed air control system strategy consists of increasing or decreasing the amount of black liquor fuel supplied to the boiler in order to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. The boiler will be equipped with two oxygen meters, one on each side of the economizer outlet, with control governed by the lowest of the recorded values. Mill rationale for selecting the lowest reading recognizes that a failed analyzer could send the recorded oxygen to the highest level of the meter's range, which would be recognized by the control system as an indication of too much air being used. By using the lowest reading, there is a reduced probability of having insufficient air for combustion when an oxygen analyzer problem occurs.

Automatic control of the boiler is operator friendly. The "single knob control" functionality provides operators with a single input interface for changing the recovery boiler load. All other adjustments are automatic based on the load selected. To change load, the operator types in an input of the desired load and the control system smoothly and precisely ramps liquor flow and air supply to the new load conditions without operator intervention. The throughput change is ramped at a fixed programmed rate determined during start-up. The smooth, ramped load change minimizes drum level, steam header, and furnace pressure upsets. The gradual change further provides furnace stability as load is adjusted to minimize turbulence and carryover that can frequently occur where liquor is changed and air controls are not.

Since the recovery boiler has been routinely operating at 98% of the 24-hour average permitted capacity, then there is no anticipated increase in this capacity of black liquor solids throughput. This minor change will be implemented with the other proposed work to modify the No. 4 Recovery Boiler in Permit No. PSD-FL-380(A).

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### Processing Schedule

April 14, 2008: Received the application for a minor source air pollution construction permit; and application deemed complete.

## 2. APPLICABLE REGULATIONS

### State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the F.A.C. This project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards <sup>1</sup>
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

<sup>1</sup> Rule 62-296.404, F.A.C.: Kraft Pulp Mills

### Federal Regulations

The existing No. 4 Recovery Boiler is subject to the federal provisions of 40 Code of Federal Regulations (CFR) 63, Subpart S, National Emissions Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry, and Subpart MM, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfitic, and Stand-Alone Semicemical Pulp Mills. These applicable provisions are listed in the current Title V Permit, No. 1070005-048-AV, and will not be repeated.

### General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's PSD program, pursuant to Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

### **PSD Applicability for Project**

This project is considered a minor revision of Permit No. PSD-FL-380 and will not result in any emissions increases. Therefore, the project is not subject to PSD preconstruction review. Once the No. 4 Recovery Boiler is modified, carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) emissions will be continuously monitored to ensure efficient combustion as well as compliance with the new standards.

### **3. EMISSIONS STANDARDS**

#### **Draft Permit Requirements**

The previously issued permit will be revised to include the authorization to install the "Consumed Air" process control system on the existing No. 4 Recovery Boiler.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**DRAFT**

**NOTICE OF PERMIT REVISION**

In the Matter of an  
Application for Permit by:

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

Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

*Authorized Representative:*

Mr. Keith Wahoske, Vice President – Palatka Mill Operations

Georgia-Pacific Consumer Operations LLC operates the Palatka Mill in Putnam County located North of CR 216 and West of US 17 in Palatka, Florida. This draft air construction permit revision amends the original Permit No. PSD-FL-380 (Project No. 1070005-038-AC) and authorizes the installation of a new automated consumed air control system to improve combustion and efficiency of the No. 4 Recovery Boiler. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., 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

(DRAFT)

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
(Date)

JK/tlv/jfk/bm

**PERMIT REVISION**

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**CERTIFICATE OF SERVICE**

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

- Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))
- Mr. Christopher Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))
- Mr. Dee Morse, National Park Service ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

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)

\_\_\_\_\_  
(Date)

## PERMIT REVISION

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This permit revision modifies original Permit No. PSD-FL-380 (Project No. 1070005-038-AC).

The following permit conditions are revised as follows. Deleted text is marked by ~~strikethrough~~ and new text is marked with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

### Section 3. Emissions Unit Specific Conditions. Subsection D. No. 4 Recovery Boiler.

- No. 4 Recovery Boiler Modifications: The permittee is authorized to perform the following modifications to the No. 4 Recovery Boiler in accordance with the following preliminary schedule: modify the combustion air system; add a fourth level of overfire air (quaternary air); ~~and~~ replace tubes in the superheater, economizer, and walls of the recovery boiler; and install a "Consumed Air" process control system. These changes will not increase the existing permitted capacity of the recovery boiler or the pulp mill. The preliminary schedule is to begin construction in May of 2007. [Application No. 1010005-038-AC; Rules 62-212.300 and 62-212.400 (PSD), F.A.C.; PSD-FL-380; and PSD-FL-380(B)]

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Attachments:** 1070005.053.AC.D\_.pdf.zip

Tracking:	Recipient	Delivery	Read
	<input checked="" type="checkbox"/> 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'		
	<input checked="" type="checkbox"/> 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'		
	<input checked="" type="checkbox"/> 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'		
	<input checked="" type="checkbox"/> 'Mr. David Buff, P.E., Golder Associates, Inc.'		
	<input checked="" type="checkbox"/> Kirts, Christopher	Delivered: 6/20/2008 2:52 PM	Read: 6/23/2008 8:14 AM
	<input checked="" type="checkbox"/> 'Ms. Kathleen Forney, U.S. EPA, Region 4'		
	<input checked="" type="checkbox"/> 'Mr. Dee Morse, National Park Service'		
	<input checked="" type="checkbox"/> Mitchell, Bruce	Delivered: 6/20/2008 2:52 PM	
	<input checked="" type="checkbox"/> Walker, Elizabeth (AIR)	Delivered: 6/20/2008 2:52 PM	
	<input checked="" type="checkbox"/> Gibson, Victoria	Delivered: 6/20/2008 2:52 PM	Read: 6/20/2008 2:59 PM

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Thank you,

DEP, Bureau of Air Regulation

6/23/2008

## Harvey, Mary

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** undisclosed-recipients  
**Sent:** Friday, June 20, 2008 5:31 PM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

To: DBuff@GOLDER.com  
Subject:

was read on 6/20/2008 5:31 PM.



**Harvey, Mary**

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**Sent:** Saturday, June 21, 2008 12:49 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

David A. Buff, P.E., Q. E. P.  
Golder Associates Inc.  
Phone: (352)336-5600 x 545  
Fax: (352)336-6603 Mobile: (352)514-5600  
E-Mail: [dbuff@golder.com](mailto:dbuff@golder.com)

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---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC; Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC; Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC; Buff, Dave; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

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Thank you,

DEP, Bureau of Air Regulation

6/23/2008

## Harvey, Mary

---

**From:** Kirts, Christopher  
**To:** Harvey, Mary  
**Sent:** Monday, June 23, 2008 8:14 AM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Sent:** 6/20/2008 2:51 PM

was read on 6/23/2008 8:14 AM.



## Harvey, Mary

---

**From:** Dee\_Morse@nps.gov  
**Sent:** Monday, June 23, 2008 11:29 AM  
**To:** Harvey, Mary  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

### Return Receipt

Your Georgia-Pacific Consumer Operations - 1070005-053A  
document:

was Dee Morse/DENVER/NPS  
received  
by:

at: 06/23/2008 09:27:10 AM MDT

## Harvey, Mary

---

**From:** Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]  
**To:** Harvey, Mary  
**Sent:** Monday, June 23, 2008 9:26 AM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

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

was read on 6/23/2008 9:26 AM.

## Harvey, Mary

---

**From:** Gibson, Victoria  
**Sent:** Friday, June 20, 2008 3:00 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

Thank you.....and have great weekend.

Vickie

---

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

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Thank you,

DEP, Bureau of Air Regulation

## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:59 PM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Sent:** 6/20/2008 2:51 PM

was read on 6/20/2008 2:59 PM.

**Harvey, Mary**

---

**From:** Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]  
**Sent:** Friday, June 20, 2008 2:59 PM  
**To:** Harvey, Mary; Curtis, Michael; Aguilar, Mark J.; Mr. David Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

We are in receipt of your Email.

Keith Wahoske

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

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** Wahoske, Keith; Curtis, Michael; Aguilar, Mark J.; Mr. David Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

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DEP, Bureau of Air Regulation

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6/20/2008

## Harvey, Mary

---

**From:** Mitchell, Bruce  
**Sent:** Friday, June 20, 2008 3:24 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

Many thanks, Mary, for handling the processing of the mail out! Take care and have a great week-end.

Bruce

---

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

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Thank you,

DEP, Bureau of Air Regulation

6/20/2008



**Harvey, Mary**

---

**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Monday, June 23, 2008 11:18 AM  
**To:** Harvey, Mary  
**Cc:** Kelley, Tracey S.  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Please forward the Public Notice of Intent document in Microsoft Word format so that we can proceed with publication in the local newspaper.

Best regards,

Ron Reynolds  
Environmental Engineer - Air Quality  
Georgia Pacific - Palatka Mill  
Office 386-329-0967  
Cell 386-916-3133

6/23/2008