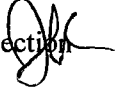


Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief, Bureau of Air Regulation
THROUGH: Jeff Koerner, Administrator, New Source Review Section 
FROM: Bruce Mitchell, New Source Review Section
DATE: April 7, 2009
SUBJECT: Project No. 1070005-060-AC
Georgia-Pacific Consumer Operations LLC - Palatka Mill
No. 4 Combination Boiler (CB) Bark Feed System Project
Evaluation of Routine Maintenance, Repairs or Replacement of Equipment Components

Attached for your review is an applicability determination, project No. 1070005-060-AC, regarding proposed changes to the No. 4 CB's bark feed system. A request was received on behalf of the Georgia-Pacific – Palatka Mill, which requested an applicability determination that the changes planned for the No. 4 CB's bark feed system in the mill's next planned outage qualifies as "routine maintenance, repairs or replacement" activities and is not subject to Prevention of Significant Determination New Source review (PSD NSR). The mill's next planned outage is April 2009. The 1988 WEPCO determination articulates five factors for assessing the "routineness" of a maintenance, repair or replacement activity: nature, extent, purpose, frequency and cost. The proposed No. 4 CB's bark feed system project is evaluated in light of these factors. Based on the definition of modification in Rule 62-210.200, F.A.C., the project is determined to be routine repair and maintenance, which is excluded from the definition of modification.

Your approval is recommended of the attached applicability determination.

Attachment



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

April 7, 2009

Sent by Electronic Mail – Received Receipt Requested

Mr. Gary Frost, V.P. and Mill Manager
Georgia-Pacific Consumer Operations LLC
Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

Re: Project No. 1070005-060-AC
Palatka Mill – No. 4 Combination Boiler
Routine Maintenance, Repair and Replacement of Components of the Bark Feed System

Dear Mr. Frost:

On March 19, 2009, we received a request to consider the proposed work planned for the bark feed system to the No. 4 Combination Boiler (CB) to be routine maintenance, repair and replacement (RMRR) to maintain reliability of the existing equipment. The proposed work to the bark feed system would have been made along with the authorized upgrades to the No. 4 CB under air construction permit No. PSD-FL-393, dated September 28, 2008, but economic conditions have resulted in postponement of that project. Accordingly, the Department of Environmental Protection (Department) is being asked for concurrence that the proposed work to the No. 4 CB's bark feed system constitutes RMRR and is exempt from preconstruction review in accordance with Rule 62-212.400 of the Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Review: The relevant criteria for determining whether a given project constitutes RMRR are set out in EPA's 1988 WEPCO memorandum and in EPA's 1992 "WEPCO Rule". In the preamble of the WEPCO Rule, EPA states that the determination of whether the activity in question is routine "must be based on an evaluation of whether that type of equipment has been repaired or replaced by sources within the relevant industrial category." The 1988 WEPCO determination articulates five factors for assessing the "routineness" of a maintenance, repair or replacement activity: nature, extent, purpose, frequency and cost. The proposed No. 4 CB's bark feed system project is evaluated in light of these factors as follows.

Nature: The project will include the following activities, which should result in less downtime for maintenance on the bark feed system and extend its reliability such that the No. 4 CB will be able to burn more bark and less fuel oil on an annual basis than it has in the past few years. None of the work planned will affect the design capacity of the bark feed system nor the No. 4 CB.

- Replacement of the existing bark cyclone with a unit of identical dimensions and capacity, but with improved wear materials. The existing bark cyclone has a "troweled-in" ceramic wear surface over hardened steel. The bark cyclone has historically been replaced every four years and the current unit is four years old. The replacement will have a more protective "custom fit" ceramic tile lining and an expected life of five years.
- Replacement of the existing bark blow-line elbows and pipe sections with improved wear materials. The hardened steel wear-backs on the blow-line elbows will be replaced with ceramic-lined wear-backs. Worn blow-line pipe sections will be replaced with ceramic-lined pipe.

ROUTINE MAINTENANCE, REPAIR AND REPLACEMENT DETERMINATION

- Rebuild of the Atlas bark bin, including repairs to the bin floor, out-feed conveyor, internal bark sweeps and drive train. The concrete floor of the bin is worn down to the rebar. The floor will be relined with concrete and a protective coating to restore effective bark flow to the out-feed conveyor. The coating will be upgraded to materials currently available. The drive train gears and drag chain for the bark sweeps have worn to the point of causing misalignment of the sweeps, resulting in breakage of the digger bars that are attached to the sweeps. The sweeps and drive train gears and drag chain will be replaced and/or rebuilt to correct these deficiencies. The polytetrafluoroethylene liners in the out-feed conveyor have fallen out due to wear past their useful life and need to be replaced.
- Replace the bark hog rotor, wear parts and bearings. The bark hog is due for its five-year rebuild. The existing bark hog rotor is out of tolerance specifications (loose) and will be replaced along with bearing sleeves. Also, the wear parts of the hog (striker plates and anvils) are cracking or worn and require replacement.
- Replace worn sections of bark chutes and wear plates or liner materials. The worn section of the bark chutes will be replaced with wear plates to reduce leakage and risk of fires due to build-up of dust.

The proposed work referenced above is considered to be routine for this industry and is expected to occur over the useful life of a bark feed system. The proposed work is currently scheduled to occur during the annual No. 4 CB outage in April 2009.

Extent: Besides the proposed RMRR work on the bark feed system, additional routine maintenance items normally conducted on an annual basis will also be done on the No. 4 CB during the planned outage. The outage is planned to last approximately 23 days, which is in line with the normal amount of annual outage downtime for the No. 4 CB and other equipment at this facility.

Purpose: The proposed RMRR work is being done to maintain the reliability of the bark feed system and to ensure consistent burn rates in the No. 4 CB. Performing this work is intended to reduce future downtime for the bark feed system and reduce fuel oil consumption and associated costs for making steam.

Frequency: The No. 4 CB was originally constructed in 1966. Annual outages on the mill's boilers and associated equipment are typical in which the internal components are evaluated for potential RMRR to maintain safe and reliable operation. The type of work proposed for the upcoming annual outage has been previously done at regular intervals because the equipment components are subject to normal wear through routine operation. The following list provides the number of times that repairs were made to the existing bark feed system's components (via issuance of a maintenance work order), in addition to any maintenance performed during the No. 4 CB's annual outages from 2005 to 2008.

Number of Repairs/Maintenance Activities Performed on the Bark Feed System

<u>Feed System Component</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>
Bark Cyclone	20	14	20	18
Blow Lines	28	29	51	35
Bark Bin/Feed System	95	148	143	119
Bark Hog	54	59	86	54
Bark Chutes/Belts/Conveyors	144	191	261	221
Totals:	341	441	561	447

Cost: The estimated cost of the equipment replacement and upgrade work proposed for this project is \$700,000. The cost is less than 5% of the estimated \$15 million cost of a comparable new bark feed system.

ROUTINE MAINTENANCE, REPAIR AND REPLACEMENT DETERMINATION

No capital funds have been allocated to this project. The mill’s annual maintenance budget for the No. 4 CB’s bark feed system has been somewhat variable based on specific year-to-year needs, as shown in the following table.

<u>Year</u>	<u>Bark Feed System Maintenance Costs</u>	<u>Number of Outage Days of the Bark Feed System</u>
2005	\$344,922	21
2006	\$528,453	21
2007	\$549,475	17
2008	\$636,279	23
2009 ¹	\$700,000	23

¹ Estimated and includes anticipated rises in cost of materials and labor.

Department’s Conclusion: The proposed work includes several physical changes that could be considered a “modification” as defined in Rule 62-210.200, F.A.C. However, based on the nature, extent, purpose, frequency and cost, the Department determines that the proposed work is considered routine for this industry. Pursuant to the definition of modification, “A physical change or change in the method of operation shall not include routine maintenance, repair, or replacement of component parts of an emissions unit.”

Therefore, the project is not subject to preconstruction review and no air construction permit is required. This permitting decision is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210 and 62-212, F.A.C. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department’s Division of Air Resource Management. 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.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department’s Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 21 days of receipt of this permit action. 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; (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

ROUTINE MAINTENANCE, REPAIR AND REPLACEMENT DETERMINATION

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.

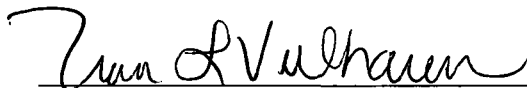
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such 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.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Judicial Review: Any party to this permitting decision (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 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

TLV/jfk/bm

ROUTINE MAINTENANCE, REPAIR AND REPLACEMENT DETERMINATION

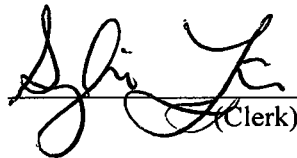
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Routine Maintenance, Repair and Replacement Determination was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 4/7/09 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC (michael.curtis@gapac.com)
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Catherine Collins, Fish and Wildlife Service (catherine_collins@fws.gov)
- Ms. Vickie Gibson, BAR Reading File (Victoria.Gibson@dep.state.fl.us)

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)

4/7/09

(Date)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, April 07, 2009 4:30 PM
To: 'GARY.FROST@GAPAC.com'
Cc: 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; Kirts, Christopher; 'abrams.heather@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'catherine_collins@fws.gov'; Gibson, Victoria; Walker, Elizabeth (AIR); Mitchell, Bruce
Subject: Determination for Georgia-Pacific Consumer Operations, LLC - (Palatka Mill 1070005-060-AC)
Attachments: 0470002-068-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Frost, Gary (Florida) [GARY.FROST@GAPAC.com]
Sent: Wednesday, April 08, 2009 7:50 AM
To: Livingston, Sylvia
Cc: Curtis, Michael; Reynolds, Ron E.; Rush, Carl D.
Subject: RE: Determination for Georgia-Pacific Consumer Operations, LLC - (Palatka Mill 1070005-060-AC)

Message was received – Thank you so much for the work you do.....

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, April 07, 2009 4:52 PM
To: GARY.FROST@GAPAC.com
Cc: michael.curtis@gapac.com; mjaguila@gapac.com; Kirts, Christopher; abrams.heather@epamail.epa.gov; forney.kathleen@epa.gov; catherine_collins@fws.gov; Gibson, Victoria; Walker, Elizabeth (AIR); Mitchell, Bruce
Subject: Determination for Georgia-Pacific Consumer Operations, LLC - (Palatka Mill 1070005-060-AC)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.