



Palatka Pulp and Paper Operations  
Consumer Products  
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March 24, 2011

Mr. Jeffery F. Koerner, Air Permitting North Section  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Re: Project no. 1070005-066-AC  
Modification of the No. 4 Combination Boiler (EU ID 016)  
Natural Gas conversion, Dust Collector, ID Fan**

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AIR REGULATION

Dear Mr. Koerner:

Regarding the subject draft permit issued March 10, 2011, we offer the following comments:

- Section 1, Facility Description: The emissions unit list does not include all EU Nos. listed on our current Title V permit. Those missing are 039-Bark Hog, 047-BSW lines 3,5,6,&7, 048-O2 DeLig system, and 050-Converting.
- Section 1, General Information – Proposed project description: The description says that the existing steam driven induced draft fan-drive is being replaced with an electric motor. Actually the fan will be replaced also (with no capacity increase), so we suggest it be revised as: “replace the existing steam-driven induced draft fan with an electric motor and fan”.
- Section 3, A – emissions unit description says that the unit continuously monitors for TRS emissions. This is incorrect; there is no TRS CEMS on the #4 Combination Boiler. Also, the last statement in the description which begins with “This project includes...” should be revised to include the replacement of the ID fan, and the partial replacement (28 tube sections) of the superheater.
- Section 3, Permit Condition A.2.c should be revised to read “Replace the existing steam turbine-driven Induced Draft (ID) fan for the no. 4 Combination Boiler with an electric motor and ID fan.”
- Section 3, Permit Condition A.4 lists an incorrect maximum heat input rate for bark/wood firing. The rate is listed as 564.0 MMBtu/hr, but should be 512.7 MMBtu/hr.
- TE&PD, Section 1, Paragraph 2 of the Project Description (top of page 9): The first sentence says that the replacement of the 28 tube sections of the superheater section was originally permitted in permit No. 1070005-045-AC. Actually, the modification to the dust collection system was part of that permit along with the gas conversion, and the superheater section modification should be referenced in the second sentence along with the ID fan replacement.


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- TE&PD, Table 1: The 'could have accommodated' emissions for CO and VOC are added to the baseline actual emissions. We suggest including it as a separate column to clearly identify the portions that are baseline emissions and could have accommodated emissions.
- TE&PD, Section 3, Paragraph 4: The first two sentences should be revised similarly to the second bullet above to reflect that the ID fan will also be replaced, not just the drive type.
- TE&PD, Section 3, Paragraph 4: It is stated, "The permittee considered the restored bark rate as 'could have accommodated' rate in its review of potential emissions." However, we excluded the restored bark rate from 'could have accommodated' because it is clearly related to the project. We suggest updating the sentence to read, "The permittee excluded the restored bark rate when determining the 'could have accommodated' rate in its review of projected actual emissions, as it is related to the project."
- TE&PD, Section 3, Paragraph 5 states that the replacement of the 28 continuous tube sections of the superheater was previously permitted under permit no. 1070005-038-AC, PSD-FL-380. Review of the 038-AC permit does not support this. While the replacement of tubes in the #4 Recovery Boiler (EU ID 018) was covered, there was no mention of tube replacement for the #4 Combination Boiler. However, this correction has no effect on the current permitting action which will authorize the superheater tube replacement.

If there are any questions regarding this information, please contact Ron Reynolds at 386-329-0967.

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

Sincerely,

  
Gary Frost, Vice-President  
Palatka Operations

cc: S.K. Bailey-GP-Atlanta  
W.J. Galler-GP-Atlanta  
R.E. Reynolds-GP-Palatka