



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 22, 2011

Mr. Gary L. Frost, Vice President Operations
Georgia-Pacific Consumer Operations, LLC., Palatka Mill
P.O. Box 919, Palatka, FL 32178-0919

Re: Draft Air Permit No. 1070005-067-AC/PSD-FL-380C
Georgia-Pacific Palatka Mill
No. 4 Lime Kiln Burner Replacement Project

Dear Mr. Frost:

On March 14, 2011, you submitted an application for an air construction permit to replace the following equipment on the No. 4 Lime Kiln: the existing fuel oil burner with a combination fuel oil/natural gas burner; the primary fan replacement; and the induced draft fan. This equipment is located at the existing Georgia-Pacific Palatka Mill in Putnam County at 215 County Road 216 in Palatka, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit 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 me at 850/717-9083.

Sincerely,

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

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

Authorized Representative:
Gary L. Frost, Vice President Operations

Air Permit No. 1070005-067-AC
PSD-FL-380C
Permit Expires: December 31, 2012
Georgia-Pacific Palatka Mill
No. 4 Lime Kiln Burner Replacement Project
Putnam County, Florida

Facility Location: Georgia-Pacific Consumer Operations, LLC operates the existing Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida.

Project: The applicant proposes to replace the existing fuel oil burner with a combination fuel oil/natural gas burner, primary fan replacement, and induced draft fan replacement for the No. 4 Lime Kiln. The project will not result in a net significant increase in the criteria pollutants. The project is not subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.); however the project modifies the nitrogen oxides (NOx) emissions standard that was previously subject to a determination of Best Available Control Technology based on the average of three, one-hour stack test runs. With the new burner system, the NOx emissions standard will be reduced, but be based on a 30-day rolling average as determined by data collected from a continuous emissions monitoring system. 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, 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 Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/717-9000.

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, 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 by entering draft permit number:
<http://www.dep.state.fl.us/air/emission/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 the proposed equipment will not adversely impact air quality and that the project will comply with all applicable 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 in accordance with the conditions of the proposed Draft Permit 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 the address or phone number listed above. Pursuant to Rule 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 and requests for a public meeting for a period of 30 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 30-day period. In addition, if a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). 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. 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 fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permit, 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.

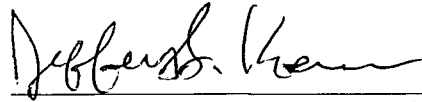
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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; (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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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. 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.



Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

8-22-11

(Date)

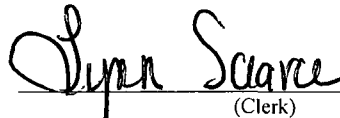
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) 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 8-22-11 to the persons listed below.

- Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)
- Mr. David A. Buff, Golder Associates (dbuff@golder.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Lynn Scarce, DARM OPC Reading File (lynn.scarce@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)

August 22, 2011
(Date)

Florida Department of Environmental Protection

Memorandum

To: Brian Accardo, DARM Deputy Director
From: Jeff Koerner, Office of Permitting and Compliance Administrator
Date: August 22, 2011
Subject: Draft Minor Source Air Construction Permit
Project No. 1070005-067-AC/PSD-FL-380C
Georgia-Pacific Consumer Operations, LLC- Palatka Mill
Lime Kiln Burner Replacement Project

Attached for your review is a draft PSD air construction permit revision package for the Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida. Briefly, the draft permit authorizes the replacement of the following equipment for the No. 4 Lime Kiln: the existing fuel oil burner with a combination fuel oil/natural gas burner; the induced draft fan; and the primary fan. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. Bobby Bull worked on this application until he moved to the Site Certification Office. I recommend your approval of the attached draft permit package.

Attachments

BA/jfk

P.E. CERTIFICATION STATEMENT

PERMITTEE

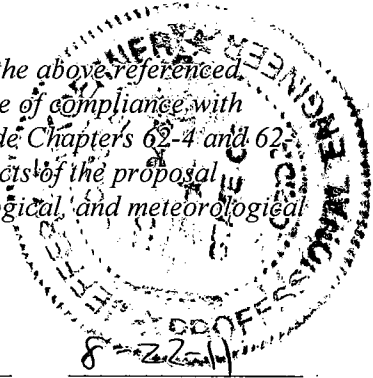
Georgia-Pacific Consumer Operations, LLC
P.O. Box 919
Palatka, FL 32178

Project No. 1070005-067-AC/PSD-FL-380C
Georgia-Pacific Palatka Mill
No. 4 Lime Kiln Burner Replacement Project
Putnam County, Florida

PROJECT DESCRIPTION

The applicant proposes to replace the existing fuel oil burner with a combination fuel oil/natural gas burner, primary fan replacement, and induced draft fan replacement for the No. 4 Lime Kiln. The project will not result in a net significant increase in the criteria pollutants. The project is not subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.); however the project modifies the nitrogen oxides (NOx) emissions standard that was previously subject to a determination of Best Available Control Technology based on the average of three, one-hour stack test runs. With the new burner system, the NOx emissions standard will be reduced, but be based on a 30-day rolling average as determined by data collected from a continuous emissions monitoring system. A full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner

Jeffery F. Koerner, P.E.
Registration Number 49441

8-22-14
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
Draft Minor Source Air Construction Permit
Project No. 1070005-067-AC/PSD-FL-380C
Georgia-Pacific Consumer Operations, LLC, Palatka Mill
Putnam County, Florida

Applicant: The applicant for this project is Georgia-Pacific Consumer Operations, LLC. The applicant's authorized representative and mailing address is: Gary L. Frost, Vice President Operations, Georgia-Pacific Consumer Operations, LLC, Palatka Mill, P.O. Box 919, Palatka, FL 32178-0919.

Facility Location: Georgia-Pacific Consumer Operations, LLC operates the existing Palatka Mill, which is located in Putnam County at 215 County Road 216 in Palatka, Florida.

Project: For the existing No. 4 Lime Kiln, the applicant proposes to replace the existing fuel oil burner with a combination burner that will be able to fire natural gas as well as oil. In addition, the primary fan and induced draft fan will be replaced. The project will not result in a net significant increase in the criteria pollutants and is not subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.); however the project modifies the nitrogen oxides (NOx) emissions standard that was previously subject to a determination of Best Available Control Technology based on the average of three, one-hour stack test runs. With the new burner system, the NOx emissions standard will be reduced, but be based on a 30-day rolling average as determined by data collected from a continuous emissions monitoring system.

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, 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 Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/717-9000.

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, 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 by entering draft permit number:
<http://www.dep.state.fl.us/air/emission/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 the proposed equipment will not adversely impact air quality and that the project will comply with all applicable 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 in accordance with the conditions of the proposed Draft Permit 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 and requests for a public meeting for a period of 30 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 30-day period. In addition, if a public meeting is requested within the 30-day comment period and

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

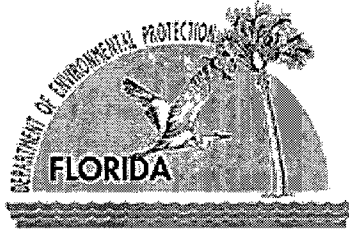
conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). 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 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 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. 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.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

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

Palatka Mill
Facility ID No. 1070005

PROJECT

Project No. 1070005-067-AC/PSD-FL-380C
Application for Minor Source Air Construction Permit
No. 4 Lime Kiln Replacement Burner Project

COUNTY

Putnam County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

August 22, 2011

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

The Palatka Mill is an existing Kraft pulp and paper mill, which is categorized under Standard Industrial Classification Code No. 2611. The existing Palatka Mill is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates of the existing facility are Zone 17, 434.00 km East and 3,283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has 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 in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The existing facility operates #4 Lime Kiln with a venturi scrubber to control emissions. This unit recalcines the spent lime cake (calcium carbonate) to produce the quicklime (calcium oxide), which is used to convert the green liquor to cooking liquor. The kiln currently fires residual fuel oil and has a maximum processing rate of 41.5 tons of material per hour based on a 24-hour average.

The applicant proposes to replace the existing fuel oil burner with a combination fuel oil/natural gas burner, replace the existing induced draft fan and replace the existing primary fan. The applicant expects the new burner to reduce the NO_x concentration from 140 ppmvd to 92 ppmvd on an annual basis (vendor guarantee). The applicant proposes a NO_x emissions standard of 114 ppmvd on a 30-day rolling average and the installation of a continuous emissions monitoring system (CEMS) to monitor to demonstrate compliance, excluding startup, shutdown, fuel switching and documented malfunctions.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Processing Schedule

March 14, 2011 Received the application for a minor source air pollution construction permit.
 April 8, 2011 Requested additional information.
 June 10, 2011 Received additional information; application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions from the proposed project itself will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source 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 following 28 PSD-major facility categories (includes Kraft pulp mills).

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project 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

As provided in the application, the Table 1 summarizes the actual emissions increases and PSD applicability for the project. Baseline emissions calculations, demand growth calculations, and projected actual emissions can be found in the "Tables" section of the application.

Table 1- Summary of the Applicant's PSD Applicability Analysis

Pollutant	Annual Emissions, Tons/Year					Subject to PSD?
	Baseline ¹ Actual	Demand Growth	Projected Actual	Increase	Significant Emissions Rate	
CO	16.62	1.50	68.16	50.04	100	No
NO _x	101.10	8.57	149.31	39.64	40	No
PM	59.24	5.36	67.46	2.86	25	No

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pollutant	Annual Emissions, Tons/Year					Subject to PSD?
	Baseline ¹ Actual	Demand Growth	Projected Actual	Increase	Significant Emissions Rate	
PM ₁₀	50.18	4.54	57.14	2.42	15	No
PM _{2.5}	45.50	4.12	51.81	2.19	10	No
SO ₂	1.68	0.15	1.91	0.08	40	No
SAM	0.075	0.007	0.085	0.004	7	No
TRS	4.78	0.43	4.75	-0.46	40	No
VOC	6.97	0.63	7.94	0.34	40	No
Pb ²	0.0169	0.0015	0.0192	1.60 lb	1,200 lb	No
Hg ²	0.000228	0.0000206	0.000259	0.022 lb	200 lb	No

¹ The two-year baseline period was 2005-2006. Actual emissions are based on stack tests (when available) and emissions factors.

² Emissions are stated in pounds per year.

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

Although Florida does not regulate greenhouse gas (GHG) emissions, EPA recognized GHG as a PSD pollutant subject to PSD preconstruction review. Therefore, the applicant provided a GHG emission review for this project. The applicant projects a possible increase of carbon dioxide equivalents (CO_{2e}) of only 3146 tons/year. The significant emission rate CO_{2e} is less than the 75,000 ton per year threshold. Therefore, PSD review and BACT determination for GHG emissions will not be required from EPA for this project.

3. APPLICATION REVIEW

The No. 4 Lime Kiln is currently in operation at the Palatka Mill and is permitted to burn residual fuel oil as the primary fuel and natural gas as a start up fuel. The project will replace the existing fuel oil burner with a combination fuel oil/natural gas burner, replace the existing induced draft fan, and replace the existing primary fan. As calculated by the applicant, all pollutants will be less than the PSD significant emission rates and the project does not trigger PSD preconstruction review. The draft permit specifies the following NOx BACT standard:

Nitrogen Oxides (NOx): When firing any authorized fuel, NOx emissions from the No. 4 Lime Kiln shall not exceed:

- a. *Initial Shakedown Period*: 140 ppmvd corrected to 10% oxygen based on a 30-day rolling average determined by CEMS data for the first 180 operating days after first fire upon completing replacement of the burner system.
- b. *Final*: 114 ppmvd corrected to 10% oxygen based on a 30-day rolling average determined by CEMS data after completing the initial shakedown period.

This standard supersedes all previous BACT standards for NOx emissions from the No. 4 Lime Kiln. [Application No. 1070005-067-AC; Rule 62-212.400(BACT), F.A.C.]

The limit excludes data collected during startup, shutdown, fuel switching and malfunctions. The initial shakedown period provides flexibility to operate and tune the new burner system. Based on discussions¹ between the Department and the applicant, this limit will replace the previous BACT limit in Permit No. PSD-FL-380, which specified 140.0 ppmvd at 10% O₂ (54.2 lb/hour) based on the average of three one-hour stack test runs.

¹ Phone conversations between Jeff Koerner (DARM) and Ron Reynolds (Georgia-Pacific) on August 18th and 19th, 2011.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pursuant to Rule 62-212.300(1)(e), F.A.C., the operator must submit reports for the five full calendar years after completing installation and shakedown. Actual emissions shall be estimated in accordance with Rule 62-210.370, F.A.C.

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. Bobby Bull 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 Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

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

Authorized Representative:
Gary L. Frost, Vice President Operations

Air Permit No. 1070005-067-AC
PSD-FL-380C
Permit Expires: December 31, 2012
Georgia-Pacific Palatka Mill
No. 4 Lime Kiln Burner Replacement Project
Putnam County, Florida

PROJECT

This is the final air construction permit, which authorizes: replacement of the fuel oil burner on the No. 4 Lime Kiln with a combination fuel oil/natural gas burner; replacement of the primary fan; and replacement of the induced draft fan. This project does not authorize the increase any production rates for the No. 4 Lime Kiln. The proposed work will be conducted at the existing Palatka Mill, which is a Kraft pulp and paper mill categorized under Standard Industrial Classification Code No. 2611. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates are Zone 17, 434.00 km East and 3,283.4 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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

(DRAFT)

(Signature)

(Date)

(Printed Name of Above Designee)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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 DRAFT to the persons listed below.

- Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)
- Mr. David A. Buff, Golder Associates (dbuff@golder.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Lynn Searce, DARM OPC Reading File (lynn.searce@dep.state.fl.us)

Clerk Stamp

FILED 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)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

The existing facility is a pulp and paper mill. The mill includes the No. 4 Lime Kiln, which recalcines the spent lime cake (a.k.a. lime mud solids) which is primarily calcium carbonate to produce the quicklime (calcium oxide), which is used to convert the green liquor to cooking liquor. The kiln currently fires residual fuel oil and has a maximum processing rate of 41.5 tons of lime mud solids per hour based on a 24-hour average. Particulate matter emissions are controlled by a cyclonic dust collector followed by a venturi scrubber.

The proposed project will: replace the existing fuel oil burner with a combination fuel oil/natural gas burner; replace the existing induced draft fan; and replace the existing primary fan. This project will modify the following emissions unit.

Facility ID No. 1070005	
ID No.	Emission Unit Description
017	No. 4 Lime Kiln

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- 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 in accordance with Rule 62-212.400 (PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The 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 Northeast District at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing 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. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be 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.]
7. Source Obligation:
 - (a) 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.
 - (b) 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.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air 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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant identified below that could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected as specified below; using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions as calculated pursuant to the provisions of Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1. and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual CO, NO_x, PM and VOC emissions for the No. 4 Lime Kiln (EU-017).

[Application 1070005-067-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Emissions Unit 017

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
017	No. 4 Lime Kiln: This unit recalcines the lime mud solids or spent lime cake (calcium carbonate) to produce the quicklime (calcium oxide), which is used to convert the green liquor to cooking liquor. After completing the project, the kiln will fire natural gas and residual fuel oil. The No. 4 Lime Kiln has a maximum processing rate of 41.5 tons of lime mud solids per hour based on a 24-hour average. Particulate matter emissions are controlled by a cyclonic dust collector followed by a wet venturi scrubber. Emissions of total reduced sulfur (TRS), the scrubber pressure drop, and the scrubber flow rate are continuously monitored and recorded. At permitted capacity, the exhaust gas flow rate is 54,200 dscfm at 10% oxygen with an exit temperature of 161° F. The maximum burner capacity is 130 MMBtu/hour. Exhaust gases exit a stack that is 4.4 feet in diameter and 131 feet tall. The nitrogen oxides emissions will be monitored with a continuous emissions monitoring system (CEMS).

ADDITIONAL REQUIREMENTS

1. Existing Permits and Regulations: This permit supplements other previously issued air permits for the No. 4 Lime Kiln, which include the following applicable state and federal regulations.
 - a. Pursuant to Rule 62-212.400, F.A.C. and Permit No. PSD-FL-380, the No. 4 Lime Kiln is subject to the Best Available Control Technology (BACT) determinations for carbon monoxide (CO), nitrogen oxides emissions (NO_x), particulate matter with a mean particle diameter of 10 microns or less (PM₁₀) and volatile organic compounds (VOC) emissions.
 - b. Pursuant to Rule 62-296.404(3)(e), F.A.C., the No. 4 Lime Kiln is subject to the applicable requirements for TRS emissions from a lime kiln at a Kraft pulp mill.
 - c. Pursuant to 40 CFR 63.862(a)(1), the No. 4 Lime Kiln is subject to the applicable requirements for controlling HAP emissions from the pulping system at Kraft processes. [NESHAP Subpart MM in 40 CFR 63]

EQUIPMENT

2. Replacement Burner: The permittee is authorized to replace the existing fuel oil burner with a combination natural gas/fuel oil burner in the No. 4 Lime Kiln. [Application No. 1070005-067-AC]
3. Replacement Fans: The permittee is authorized to replace the existing induced draft (ID) fan and the primary fan for the No. 4 Lime Kiln. [Application No. 1070005-067-AC]
4. CEM Systems: The permittee shall install, calibrate, operate, and maintain a continuous emission monitoring system (CEMS) to measure and record the emissions of NO_x from the lime kiln in terms of the applicable standards. The monitoring system shall be installed, and functioning within 90 days of completing construction and physical shakedown of the new burner, but no later than 180 days after first fire. [Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

5. Authorized Fuel: After installation of the replacement burner, ID fan, and primary fan, the permittee is authorized to continuously fire natural gas or residual fuel oil at the No. 4 lime kiln. [Application No. 1070005-067-AC and Rule 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Emissions Unit 017

6. Restricted Operation: The hours of operation of the No. 4 lime kiln are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
7. Permitted Capacity: After completing the modifications, the maximum heat input rate to the No. 4 Lime Kiln is 130 MMBtu/hours based on a 24-hour average. *{Permitting Note: This is equivalent to approximately 867 gallons per hour of residual fuel oil (based on a heating value of 150,000 Btu/gallon) or 130,000 cubic feet of natural gas per hour (based on a heating value of 1,000 Btu/cubic feet).}* [Application No. 1070005-067-AC; and Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

8. Nitrogen Oxides (NO_x): When firing any authorized fuel, NO_x emissions from the No. 4 Lime Kiln shall not exceed:
 - a. *Initial Shakedown Period*: 140 ppmvd corrected to 10% oxygen based on a 30-day rolling average determined by CEMS data for the first 180 operating days after first fire upon completing replacement of the burner system.
 - b. *Final*: 114 ppmvd corrected to 10% oxygen based on a 30-day rolling average determined by CEMS data after completing the initial shakedown period.

This standard supersedes all previous BACT standards for NO_x emissions from the No. 4 Lime Kiln. [Application No. 1070005-067-AC; Rule 62-212.400(BACT), F.A.C.]

EXCESS EMISSIONS

9. Definitions:
 - a. *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.
 - b. *Shutdown* is the cessation of the operation of an emissions unit for any purpose.
 - c. *Malfunction* is defined as 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.

[Definitions, Rule 62-210.200, F.A.C.]

10. 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. All such preventable emissions shall be included in any compliance determinations based on CEMS data. [Rule 62-210.700(4), F.A.C.]
11. NO_x Data Exclusion Procedures: As specified in Condition 12, limited amounts of CEMS emissions data may be excluded from the NO_x BACT standard (30-day rolling average), provided that best operational practices to minimize emissions are adhered to and the duration of data excluded is minimized. As provided by the authority in Rule 62-210.700(5), F.A.C., these conditions replace the provisions in Rule 62-210.700(1), F.A.C.
 - a. *Limiting Data Exclusion*. If the 30-day rolling average using all valid CEMS emission data indicates that the emission unit is in compliance, then no CEMS data shall be excluded from the compliance average.
 - b. *Event-Driven Exclusion*. There must be an underlying event (startup, shutdown, malfunction, or fuel switching) that causes excess emissions in order to exclude data. If there is no underlying event, then

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Emissions Unit 017

no data may be excluded.

- c. *Continuous Data.* If an authorized underlying event causes emissions in excess of the NO_x standard (30-day rolling average), then the data collected during the authorized underlying event may be excluded to demonstrate compliance. The duration of the event shall be identifiable and data shall be excluded for the continuous period.

[Rule 62-210.700, F.A.C.]

12. Allowable NO_x Data Exclusions: In accordance with the NO_x Data Exclusion Procedures of condition 11 and for each of the events listed below, the following data may be excluded from the NO_x BACT standard (30-day rolling average):
 - a. *Startup and Shutdown:* Up to eight hours of NO_x CEMS data may be excluded due to each startup and each shutdown of the lime kiln.
 - b. *Malfunction:* In any calendar day, up to two hours of NO_x CEMS data may be excluded due to a malfunction.
 - c. *Fuel Switching:* Up to one hour of CEMS data may be excluded due to a fuel switch.

Only those minutes attributable to an authorized event shall be excluded. All valid emissions data (including data collected during startup, shutdown, malfunction, and fuel switching) shall be used to report annual emissions for the Annual Operating Report (Rule 62-210.370, F.A.C.) and the report comparing Actual Emissions to Baseline Actual Emissions (Rule 62-212.300(1)(e), F.A.C.).

[Rules 62-210.200(BACT), 62-210.370, and 62-210.700, F.A.C.]

13. Notification Requirements: The owner or operator shall notify the Compliance Authority within one working day of discovering any emissions that demonstrate non-compliance for a given averaging period.
[Rule 62-4.070, F.A.C.]

TESTING AND CONTINUOUS MONITORING REQUIREMENTS

{Permitting Note: The permittee will continue to conduct compliance tests in accordance with the methods and frequency specified in the current Title V air operation permit.}

14. Continuous Compliance: The permittee shall demonstrate continuous compliance with the 30-day NO_x standard with data collected from the required CEMS. [Rules 62-4.070 and 62-212.400(BACT), F.A.C.]
15. Performance Specifications: The owner or operator shall evaluate the acceptability of each CEMS by conducting Performance Specification 2 for NO_x in Appendix B of 40 CFR Part 60. CEMS determined to be unacceptable by this performance specification shall not be considered installed for purposes of meeting the timelines of this permit. [Rules 62-4.070 and 62-212.400(BACT), F.A.C.]
16. Quality Assurance: The owner or operator shall follow the quality assurance procedures of Appendix F in 40 CFR Part 60. For NO_x monitors, the required relative accuracy test audit (RATA) tests shall be performed using EPA Method 7E in Appendix A of 40 CFR Part 60. NO_x shall be expressed "as NO₂." [Rules 62-4.070 and 62-212.400(BACT), F.A.C.]
17. 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). [Rule 62-4.070(3), F.A.C.]
18. Gas Flow Rate: The permittee shall submit to the Department for review a development plan for determining the F-Factor for the gas flow rate from the No. 4 Lime Kiln. Once approved by the Department, the permittee shall implement the development plan to determine the F-Factor. If the

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Emissions Unit 017

methodology in the development plan cannot be confirmed to be within 20% of the mean value of the reference method test data in terms of the units of the emission standard, or 10% of the applicable standard as compared to actual stack flow measurements, whichever is greater, the permittee shall either use actual stack flow data gathered during the most recent compliance test or install an approved gas flow meter in the lime kiln exhaust stack. [Rules 62-4.070(3), F.A.C. and 40 CFR 60 Appendix B]

19. CEMS Data Requirements:

- a. Data Collection: Except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emissions shall be monitored and recorded during all operation including startup, shutdown, and malfunction.
- b. Operating Hours and Operating Days: 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. Any day with at least one operating hour for an emissions unit is an operating day for that emission unit.
- c. Valid Hour: Each CEMS shall be designed and operated to sample, analyze, and record data evenly spaced over the hour at a minimum of one measurement for each 15-minute period. 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.
 - 1) Hours that are not operating hours are not valid hours.
 - 2) 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 and the 1-hour block average is not valid.
 - 3) During fuel switching, any hour in which fuel oil is fired is attributed towards compliance with the permit standards for oil firing.
 - 4) All valid measurements shall be in accordance with 40 CFR 60.13.
 - 5) The 30-day rolling average shall be determined using 30 consecutive 24-hour block averages for operating days. The 24-hour block average shall begin at midnight of each operating day and shall be calculated from the valid hourly average concentration values. If a unit operates less than 24 hours during the block, or there are less than 24 valid hourly averages available, the 24-hour block average shall be the average of all available valid hourly average concentration values.
- d. Data Exclusion: Each CEMS shall monitor and record emissions during all operations including episodes of startup, shutdown, malfunction, and fuel switches. Limited amounts of the CEMS emissions data recorded during these authorized events may be excluded from the NO_x BACT emissions standard subject to the provisions of conditions 11 and 12 of this subsection.
- e. 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.

[Rules 62-4.070(3)]

20. CEMS Annual Emissions Requirement: The owner or operator shall use data from the NO_x CEMS when calculating annual emissions for purposes of computing actual emissions, baseline actual emissions, and net

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Emissions Unit 017

emissions increase, as defined at Rule 62-210.200, F.A.C., and for purposes of computing emissions pursuant to the reporting requirements of Rule 62-210.370(3), F.A.C. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit. [Rules 62-210.200, and 62-210.370(3), F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

21. Malfunction Notification: If emissions in excess of a standard (subject to the specified averaging period) occur due to malfunction (data exclusion), the permittee shall notify the Compliance Authority within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. [Rules 62-4.130, 62-210.700(6) and 62-212.400(BACT), F.A.C.]
22. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating hours and emissions from this facility in accordance with 62-210.370. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDICES (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

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

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

CFR: Code of Federal Regulations	NO_x: nitrogen oxides
CAA: Clean Air Act	NSPS: New Source Performance Standards
CMS: continuous monitoring system	O&M: operation and maintenance
CO: carbon monoxide	O₂: oxygen
CO₂: carbon dioxide	Pb: lead
COMS: continuous opacity monitoring system	PM: particulate matter
DARM: Division of Air Resource Management	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
DEP: Department of Environmental Protection	PM_{2.5}: particulate matter with a mean aerodynamic diameter of 2.5 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
ESP: electrostatic precipitator (control system for reducing particulate matter)	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SIP: State Implementation Plan
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SO₂: sulfur dioxide
Hg: mercury	TPD: tons/day
I.D.: induced draft	TPH: tons per hour
ID: identification	TPY: tons per year
kPa: kilopascals	TRS: total reduced sulfur
lb: pound	UTM: Universal Transverse Mercator coordinate system
MACT: maximum achievable technology	VE: visible emissions
MMBtu: million British thermal units	VOC: volatile organic compounds
MSDS: material safety data sheets	
MW: megawatt	
NESHAP: National Emissions Standards for Hazardous Air Pollutants	

SECTION 4. APPENDIX B (DRAFT)

General Conditions

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 403.141, 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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 Florida Statutes 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B (DRAFT)

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
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 (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
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 for 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) 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 (DRAFT)

Common Conditions

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 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal 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 Compliance Authority 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. **Emissions Computation and Reporting**
 - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) *Continuous Emissions Monitoring System (CEMS).*
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate ffactor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) *Mass Balance Calculations.*
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. Annual Operating Report for Air Pollutant Emitting Facility

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

Scearce, Lynn

From: Scearce, Lynn
Sent: Monday, August 22, 2011 1:45 PM
To: 'gary.frost@gapac.com'
Cc: 'ron.reynolds@gapac.com'; 'dbuff@golder.com'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Koerner, Jeff; 'lynn.scearce@dep.state.fl.us'; Friday, Barbara; Bull, Robert
Subject: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit
Attachments: 1070005-067-AC-PSD-380C, Georgia-Pacific_signature page.pdf

Tracking:	Recipient	Delivery	Read
	'gary.frost@gapac.com'		done
	'ron.reynolds@gapac.com'		
	'dbuff@golder.com'		
	Kirts, Christopher	Delivered: 8/22/2011 1:45 PM	
	'forney.kathleen@epa.gov'		
	'abrams.heather@epa.gov'		
	Koerner, Jeff	Delivered: 8/22/2011 1:45 PM	
	'lynn.scearce@dep.state.fl.us'	Delivered: 8/22/2011 1:45 PM	
	Friday, Barbara	Delivered: 8/22/2011 1:45 PM	
	Bull, Robert	Delivered: 8/22/2011 1:45 PM	Read: 8/22/2011 1:45 PM
	Scearce, Lynn		Read: 8/22/2011 1:45 PM

Dear Mr. Frost:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Jeff Koerner

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-067-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: PUTNAM

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.067.AC.D_pdf.zip

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above,

or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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>> .

Regards,

Lynn Scearce

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025

Scearce, Lynn

From: Bull, Robert
Sent: Monday, August 22, 2011 1:45 PM
To: Scearce, Lynn
Subject: RE: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Thanks Lynn!

From: Scearce, Lynn
Sent: Monday, August 22, 2011 1:45 PM
To: gary.frost@gapac.com
Cc: ron.reynolds@gapac.com; dbuff@golder.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Koerner, Jeff; Scearce, Lynn; Friday, Barbara; Bull, Robert
Subject: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Dear Mr. Frost:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Jeff Koerner

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-067-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: PUTNAM

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.067.AC.D_pdf.zip

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems

opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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>> .

Regards,

Lynn Searce

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025

The Department of Environmental Protection values its customers options and feedback. Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

Scearce, Lynn

From: Microsoft Exchange
To: gary.frost@gapac.com; ron.reynolds@gapac.com
Sent: Monday, August 22, 2011 1:45 PM
Subject: Relayed: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

gary.frost@gapac.com

ron.reynolds@gapac.com

Subject: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Scearce, Lynn
To: Friday, Barbara
Sent: Monday, August 22, 2011 1:49 PM
Subject: Read: PINELLAS COUNTY RESOURCE RECOVERY FACILITY; 1030117-008-AV

Your message was read on Monday, August 22, 2011 1:48:51 PM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Monday, August 22, 2011 2:49 PM
To: Scearce, Lynn; Frost, Gary (Florida)
Cc: dbuff@golder.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Koerner, Jeff; Friday, Barbara; Bull, Robert
Subject: RE: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Documents received and viewed.

Best regards,

Ron Reynolds

GP-Palatka

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

From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Monday, August 22, 2011 1:45 PM
To: Frost, Gary (Florida)
Cc: Reynolds, Ron E.; dbuff@golder.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Koerner, Jeff; Scearce, Lynn; Friday, Barbara; Bull, Robert
Subject: 1070005-067-AC-PSD-380C, Georgia-Pacific Palatka Mill- Draft Permit

Dear Mr. Frost:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Jeff Koerner

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-067-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: PUTNAM

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.067.AC.D_pdf.zip

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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> .

Regards,

Lynn Searce

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025

The Department of Environmental Protection values its customers options and feedback. Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).