Georgia-Pacific

Palatka Pulp and Paper Operations
Consumer Products Division

P.O. Box 919
Palatka, FL 32178-0919
(386) 325-2001

November 3, 2011

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

Re: **Georgia-Pacific Consumer Operations LLC**
Palatka, Florida Mill-Facility ID No. 1070005
Installation of Lime Kiln Lump Breaker

Dear Mr. Koerner: Project No.: 1070005-069-AC

Georgia-Pacific Consumer Operations LLC (GP) owns and operates an unbleached Kraft linerboard mill in Palatka, Putnam County, Florida (Palatka Mill), which operates under Title V Air Operating Permit No. 1070005-064-AV. The Palatka Mill is proposing to install a lump breaker between the lime kiln discharge and the bucket elevator in order to reduce the safety risks associated with clearing bucket elevator jams caused by oversized lime.

Lime bucket elevator jams are caused by oversized lime plugging up the chutes to the lime silos. The lump breaker will break up these oversized lime chunks making the lime conveyed by the lime bucket elevator more uniform and reducing the frequency of plugging. The lump breaker is more specifically called a "Hot Lime Lump Crusher" and is manufactured by ConveyMor, Pelham, Alabama. The unit is a Single Roll Crusher with one roll rotating towards a fixed breaker plate. The roll teeth strike the feed and shear the material against the breaker plate. The project consists of the following:

- Installation of new lump breaker and divert gate, 10hp electric unit with slide out rails for maintenance.
- Modification of inlet and outlet chutes which will require lowering the chute at the inlet to the bucket elevator.
- Construction of an access platform with stairway around the lump breaker. The location of the lump breaker will be about 10' above the ground level.

Although the primary driver for the lump breaker is safety risk reduction, a secondary benefit may be slightly less downtime (no more than18 hours annually) for the lime kiln as a result of reducing the number of jams. Therefore, we estimated the potential emissions increase associated with an additional 18 hours per year of kiln operation (see attached table). The highest emissions increase estimated is for NOx, which is less than 0.3 TPY. The lump breaker itself is enclosed and will not be an emissions source.

There will be no physical changes or changes in the method of operation made to the lime kiln itself as a result of this project, and the projected emission increases, if any occur, will be insignificant. Georgia-Pacific believes, therefore, that this project requires no further analysis

for New Source Review (NSR) or other air permitting requirements. Again, the primary goal of the project is to reduce the safety risk associated with bucket elevator jams.

For the reasons stated above, Georgia-Pacific believes that installation of the lime lump breaker does not constitute a modification which would trigger NSR or any other State of Florida permitting requirements. The Mill wishes to begin installation of the damper control components of the system early this month to take advantage of the annual outage. Given our expedited timeline, we respectfully request that FL DEP consider this request at its earliest convenience. Should you have any questions concerning this submittal, please contact Ron Reynolds at (386) 329-0967.

Sincerely,

Gary Frost
Vice President and Mill Manager
Georgia-Pacific Consumer Operations LLC – Palatka Pulp & Paper Mill

cc: Ron Reynolds, Georgia-Pacific Consumer Operations LLC (Palatka, Florida)
Scott Bailey, Georgia-Pacific Consumer Products LP (Atlanta, Georgia)
Melissa Antoine, Georgia-Pacific LLC (Atlanta, Georgia)
Wayne Galler, Georgia-Pacific LLC (Atlanta, Georgia)
Mark Ruppel, Georgia-Pacific Consumer Products LP (Atlanta, Georgia)

Lime Crusher: Project Related Emissions
No. 4 Lime Kiln, Georgia-Pacific, Palatka

Pollutant	Emission Factor [a]		Activity Factor [b]		Annual Emissions (TPY)
Sulfur Dioxide - SO_2					
- No. 4 Lime Kiln (EU 017)	0.0118	lb/ton LMS	610	TPY LMS	0.004
Nitrogen Oxides - NO_x					
- No. 4 Lime Kiln (EU 017)	0.9240	lb/ton LMS	610	TPY LMS	0.28
Carbon Monoxide - CO					
- No. 4 Lime Kiln (EU 017)	0.4218	lb/ton LMS	610	TPY LMS	0.13
Particulate Matter Total - PM					
- No. 4 Lime Kiln (EU 017)	0.4175	lb/ton LMS	610	TPY LMS	0.13
Particulate Matter - PM_{10}					
- No. 4 Lime Kiln (EU 017)	0.3536	lb/ton LMS	610	TPY LMS	0.11
Particulate Matter - $PM_{2.5}$					
- No. 4 Lime Kiln (EU 017)	0.3206	lb/ton LMS	610	TPY LMS	0.10
Volatile Organic Compounds - VOC					
- No. 4 Lime Kiln (EU 017)	0.0491	lb/ton LMS	610	TPY LMS	0.01
Total Reduced Sulfur - TRS					
- No. 4 Lime Kiln (EU 017)	0.0294	lb/ton LMS	610	TPY LMS	0.01
Sulfuric Acid Mist - SAM					
- No. 4 Lime Kiln (EU 017)	0.0005	lb/ton LMS	610	TPY LMS	0.0002
Lead - Pb					
- No. 4 Lime Kiln (EU 017)	1.19E-04	lb/ton LMS	610	TPY LMS	0.000036
Mercury - Hg					
- No. 4 Lime Kiln (EU 017)	1.60E-06	lb/ton LMS	610	TPY LMS	4.89E-07
Non-Biogenic Carbon Dioxide - CO_2					
- No. 6 Fuel Oil	24,835	lb/10^3 gal	13.580	10^3 gal/yr	169
- Natural Gas	116,889	lb/10^6 ft^3	2.037	10^6 ft^3/yr	
Methane - CH_4					
- No. 6 Fuel Oil	0.89	lb/10^3 gal	13.580	10^3 gal/yr	0.0061
- Natural Gas	5.95	lb/10^6 ft^3	2.037	10^6 ft^3/yr	
Nitrous Oxide - N_2O					
- No. 6 Fuel Oil	0	lb/10^3 gal	--	--	--
- Natural Gas	0	lb/10^6 ft^3	--	--	

[a] Refer to Table 4-6 of the Lime Kiln burner permit application submitted March-2011 for derivation of emission factors for LMS.

[b] Project activity factors are based on 0.23% increase in uptime over 2010, which was calculated by multiplying 2010 production 259,998 TPY LMS by 0.23%.

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Scearce, Lynn

From: Koerner, Jeff
Sent: Friday, November 04, 2011 3:17 PM
To: McWade, Tammy
Cc: Linero, Alvaro; Scearce, Lynn
Subject: FW: Lime Lump Breaker Installation
Attachments: GP Lime Crusher lttr 2011-11-04.pdf

Tammy,

This is the letter from G-P basically requesting an exemption.

Please review and discuss with Al. Summarize our phone conversation with Ron to Al.

It looks like an exemption to me; even so, it requires logging and a project number.

Thanks!

Jeff

From: Reynolds, Ron E. [mailto:Ron.Reynolds@GAPAC.com]
Sent: Friday, November 04, 2011 2:32 PM
To: Koerner, Jeff
Cc: Bailey, Scott K. (GP); Antoine, Melissa K.; Galler, Wayne J.; Ruppel, Mark S.; McQuaig, Mary M.
Subject: Lime Lump Breaker Installation

November 4, 2011

Re: Lime Lump Breaker Installation

Dear Mr. Koerner,

Attached is the letter we discussed on a recent conference call. Original will follow via fedex. We would appreciate an expedited response. If you have any questions regarding the attached, please contact me at 386-329-0967, or by cell at 386-916-3133.

Best regards,

Ron Reynolds
Senior Environmental Engineer
Air Compliance & Permitting
GP-Palatka