



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

November 10, 2011

Sent by Electronic mail – Received Receipt Requested

Mr. Gary Frost, Vice-President
Georgia-Pacific Consumer Operations LLC
215 County Road 216
Palatka, Florida 32178-0919

Re: Georgia-Pacific Palatka Mill
Project No. 1070005-069-AC
Lime Kiln Lump Breaker Installation
Exemption from Requirement to Obtain an Air Construction Permit

Dear Mr. Frost:

This is a response to your letter dated November 3, 2011 regarding the installation of a lime kiln lump breaker between the Lime Kiln 4 discharge and the bucket elevator at the Georgia-Pacific (GP) Palatka Mill located in Putnam County at 215 County Road 216 in Palatka, Florida. GP believes the project is not subject to New Source Review or other other air permitting requirements and requests prompt consideration and concurrence on this matter.

Determination: Details of the project are provided in the attached letter dated November 3, 2011. Oversized lime lumps cause jams in the kiln lime elevator due to plugging of the chutes to the lime silos. The proposed lump breaker will address the conveyor plugging issues by reducing the oversized lime lumps that are fed to the lime bucket elevator. The lump breaker consists of a single roll rotating crusher and a fixed breaker plate. The project consists of the following components:

- Lump breaker and divert gate with 10 horse power (hp) electric motor and maintenance rails;
- Inlet and outlet chute modifications as required to accommodate the lump breaker; and
- An access platform with stairway that is about 10 feet above the ground level.

The lump breaker will enhance worker safety that is associated with clearing bucket elevator jams caused by oversized lime lumps that are discharged from the kiln. The possible increase in kiln operation time during a year is estimated to be approximately 18 hours per year due to reduced downtime related to clearing bucket jams.

Lime Kiln 4 is already authorized to operate continuously in accordance with existing permits. Emissions from Lime Kiln 4 are controlled by a cyclonic dust collector followed by a wet venturi scrubber. Emissions of nitrogen oxides (NO_x) from Kiln 4 would increase by no more than 0.3 tons per year (TPY) compared with the present potential to emit of 237 TPY. There would be similar insignificant actual emissions increases of other pollutants as described in the attached letter.

Pursuant to Rule 62-4.040(1)(b) of the Florida Administrative Code (F.A.C.) and for the reasons stated above, the Office of Permitting and Compliance hereby determines that the activity will not emit air pollutants "... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified." Therefore, the project is exempt from the requirement to obtain an air construction permit.

EXEMPTION FROM AIR CONSTRUCTION PERMITTING

This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

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

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 agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this exemption from air permitting requirements. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this action. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed with in the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of

EXEMPTION FROM AIR CONSTRUCTION PERMITTING

Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition of a request for extension of time, this action will not be effective until further order fo the Permitting Authority.

Judicial review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department 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



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

11-10-11

(Date)

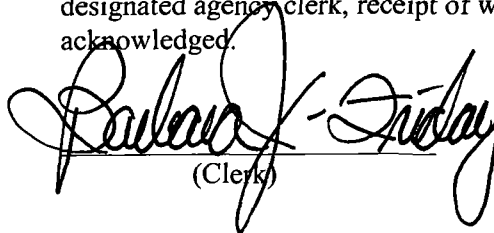
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter of Exemption and the Technical Evaluation 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 11/10/11 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC (ron.reynolds@gapac.com)
- Mr. Christopher L. Kirts, DEP Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Barbara Friday, DEP OPC (barbara.friday@dep.state.fl.us)
- Ms. Lynn Searce, DEP PC Reading File (lynn.searce@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.

 11/10/11
(Clerk) (Date)



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:

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 than 18 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 NO_x, 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

Mr. Jeffery F. Koerner
November 3, 2011

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 - SO₂ - 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 - PM₁₀ - 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 - CO₂ - 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 - CH₄ - 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 - N₂O - 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%.

Friday, Barbara

From: Friday, Barbara
Sent: Thursday, November 10, 2011 1:43 PM
To: 'gary.frost@gapac.com'
Cc: 'ron.reynolds@gapac.com'; Kirts, Christopher; Searce, Lynn; Koerner, Jeff; McWade, Tammy; Linero, Alvaro
Subject: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC
Attachments: GaryFrost1070005-069-ACExemptionFromRequirementforACPermit.pdf

Tracking:	Recipient	Delivery
	'gary.frost@gapac.com'	
	'ron.reynolds@gapac.com'	
	Kirts, Christopher	Delivered: 11/10/2011 1:43 PM
	Searce, Lynn	Delivered: 11/10/2011 1:43 PM
	Koerner, Jeff	Delivered: 11/10/2011 1:43 PM
	McWade, Tammy	Delivered: 11/10/2011 1:43 PM
	Linero, Alvaro	Delivered: 11/10/2011 1:43 PM

Dear Mr. Frost:

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. 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, Bureau of Air Regulation.

Barbara Friday
Office of Permitting and Compliance (OPC)
Division of Air Resources Management (DARM)
(850)717-9095

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

Friday, Barbara

From: Microsoft Exchange
To: 'gary.frost@gapac.com'; 'ron.reynolds@gapac.com'
Sent: Thursday, November 10, 2011 1:43 PM
Subject: Relayed: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

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: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
To: Friday, Barbara
Sent: Thursday, November 10, 2011 2:03 PM
Subject: Read: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message was read on Thursday, November 10, 2011 2:02:42 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Thursday, November 10, 2011 2:08 PM
To: Friday, Barbara; Frost, Gary (Florida)
Cc: McWade, Tammy; Linero, Alvaro
Subject: RE: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Hello Barbara,

I am verifying on behalf of Mr. Frost that we have received the subject document.

Thank you,

Ron Reynolds
Environmental Engineer, Air
Georgia Pacific Consumer Operations, LLC
Palatka, FL
Ph: 386-329-0967

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

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Thursday, November 10, 2011 1:43 PM
To: Frost, Gary (Florida)
Cc: Reynolds, Ron E.; Kirts, Christopher; Scearce, Lynn; Koerner, Jeff; McWade, Tammy; Linero, Alvaro
Subject: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Dear Mr. Frost:

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. 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, Bureau of Air Regulation.

Barbara Friday

Office of Permitting and Compliance (OPC)

Division of Air Resources Management (DARM)

(850)717-9095

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

Friday, Barbara

From: Microsoft Exchange
To: Kirts, Christopher; Linero, Alvaro; Searce, Lynn
Sent: Thursday, November 10, 2011 1:43 PM
Subject: Delivered: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message has been delivered to the following recipients:

Kirts, Christopher

Linero, Alvaro

Searce, Lynn

Subject: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Linero, Alvaro
To: Friday, Barbara
Sent: Thursday, November 10, 2011 1:59 PM
Subject: Read: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message was read on Thursday, November 10, 2011 1:59:02 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: McWade, Tammy; Koerner, Jeff
Sent: Thursday, November 10, 2011 1:43 PM
Subject: Delivered: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message has been delivered to the following recipients:

McWade, Tammy

Koerner, Jeff

Subject: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Koerner, Jeff
To: Friday, Barbara
Sent: Thursday, November 10, 2011 2:05 PM
Subject: Read: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message was read on Thursday, November 10, 2011 2:04:55 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: McWade, Tammy
To: Friday, Barbara
Sent: Thursday, November 10, 2011 1:44 PM
Subject: Read: Georgia-Pacific Palatka Mill - Project No. 1070005-069-AC

Your message was read on Thursday, November 10, 2011 1:44:10 PM (GMT-05:00) Eastern Time (US & Canada).