



Tammy AB179

Palatka Pulp and Paper
Operations
Consumer Products Division
P.O. Box 919
Palatka, FL 32178-0919

RECEIVED
MAY 27 2013
DIVISION OF AIR
RESOURCE MANAGEMENT

May 13, 2013

Mr. Syed Arif, Administrator, Air Permitting Section
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Project No:

1070005-081-AC

**Re: Georgia-Pacific Consumer Operations LLC - Palatka Mill
Facility ID No. 1070005
Replacement of Converting Department Baghouse with Drum Filtering System**

Dear Mr. Arif:

Georgia-Pacific Consumer Operations LLC (GP) owns and operates a Kraft pulp and paper mill in Palatka, Putnam County, Florida (Palatka Mill), which operates under Title V Air Operating Permit No. 1070005-074-AV which was issued by the Florida Department of Environmental Protection on January 17, 2013.

The Palatka Mill is proposing to replace the existing baghouse that controls particulate matter emissions from twelve (12) tissue converting lines in the Converting Department (Emission Unit ID No. 050) with a new drum filtering system. The existing baghouse was originally installed in 1979 and is being replaced to upgrade the converting line dust collection system to ensure compliance with new Occupational Safety and Health Administration standards. The new drum filtering system is being designed with the same air flow capacity as the existing dust collection system, which is equal to 207,000 dry standard cubic feet per minute (dscfm). We expect that the new drum filtering system will improve the overall particulate matter collection efficiency for the converting lines compared to the existing baghouse, and as a result, we are proposing lower potential-to-emit particulate matter emission rates for the new drum filtering system compared to those contained in our 2011 Title V renewal application. We also expect that the actual particulate matter emission rate from the 12 converting lines will be lower than the current actual emission rates with the use of the new drum filtering system primarily due to the differences in the age and operational condition of the existing vs. new dust collection equipment. The new drum filtering system will not affect production of the 12 converting lines.

This new drum filtering system does not affect any other portion of the Converting Department operations, including the baghouse that controls PM/PM₁₀/PM_{2.5} emissions from the Nos. 5 and 6 K-Lines, or the trim line dust collection system, which uses three cyclone separators to control PM/PM₁₀/PM_{2.5} emissions.

The Palatka Mill is classified as a major stationary source under the Prevention of Significant Deterioration (PSD) regulations in 40 CFR 51.166(b)(1)(i), which the FDEP has adopted and

implements under Rule 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). As a major stationary source, physical changes or changes in the method of operation at the facility must be reviewed to determine if a major modification will occur as defined under Rule 62-212.400(2)(a). A physical change or change in the method of operation constitutes a major modification if it results in a significant emission increase (and, if netting is triggered, a significant net emissions increase) using one of the PSD applicability tests defined under the major modification rule referenced above. While we are making a physical change to the converting line system by replacing the baghouse with a drum filtering system, as stated above, the proposed project will result in both an actual and potential decrease in particulate matter emissions from the 12 converting lines. As shown in the emission calculations attached to the enclosed permit application, the potential-to-emit emission rates for particulate matter (PM), particulate matter with an aerodynamic particle size less than 10 microns (PM₁₀), and particulate matter with an aerodynamic particle size less than 2.5 microns (PM_{2.5}), are all below their respective PSD significant emission rates. As a result, this project is not considered a major modification subject to PSD permitting.

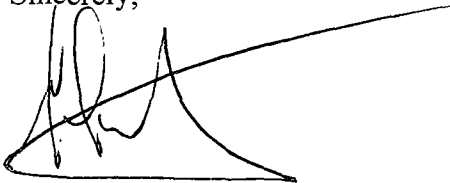
Based on recent conversations held with Mr. Syed Arif of the Air Permitting Section, we have been instructed to submit a construction permit application for the new drum filtering system.

The converting lines are not subject to any specific state particulate matter emission standards, however, the federal regulations covered by 40 CFR 63 Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, do apply to the Converting Department operations. However, these federal regulations are not in any way affected by the replacement of the baghouse with a new drum filtering system, so we have not addressed them as part of the enclosed permit application.

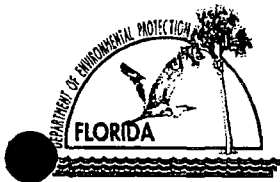
Enclosed with the permit application for the new drum filtering system are detailed emission calculations and a revised process flow diagram for the Converting Department.

Should you have any questions concerning this submittal, please contact Ron Reynolds at (386) 329-0967.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary L. Frost', with a long horizontal line extending to the right.

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



Department of Environmental Protection

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MAY 17 2013

Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

DIVISION OF AIR
RESOURCE MANAGEMENT

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Georgia-Pacific Consumer Operations LLC	
2. Site Name: Palatka Mill	
3. Facility Identification Number: 1070005	
4. Facility Location... Street Address or Other Locator: 215 County Road 216 City: Palatka County: Putnam Zip Code: 32177	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Ron Reynolds, Environmental Engineer – Air Quality	
2. Application Contact Mailing Address... Organization/Firm: Georgia-Pacific Consumer Operations LLC Street Address: P.O. Box 919 City: Palatka State: FL Zip Code: 32178-0919	
3. Application Contact Telephone Numbers... Telephone: (386) 329-0967 ext. Fax: (368) 328-0014	
4. Application Contact E-mail Address: ron.reynolds@gapac.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5-17-13	3. PSD Number (if applicable):
2. Project Number(s): 1070005-081-DC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is being submitted for the installation of a new drum filtering system that will replace the existing baghouse that controls particulate matter emissions from the 12 Converting Lines (Emission Source ID No. 050). The Mill is proposing lower potential PM/PM₁₀/PM_{2.5} emission rates with the use of the new drum filtering system compared to the existing baghouse.

This new drum filtering system does not affect any other portion of the Converting Department operations, including the baghouse that controls PM/PM₁₀/PM_{2.5} emissions from the Nos. 5 and 6 K-Lines, or the trim line dust collection system, which uses three cyclone separators to control PM/PM₁₀/PM_{2.5} emissions.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
050	Converting Department	N/A	N/A

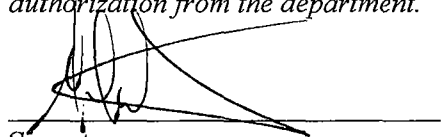
Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Gary L. Frost, Vice-President Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Georgia-Pacific Consumer Operations LLC Street Address: P.O. Box 919 City: Palatka State: FL Zip Code: 32178
3. Owner/Authorized Representative Telephone Numbers... Telephone: (386) 329-0063 ext. Fax: (386) 312-1135
4. Owner/Authorized Representative E-mail Address: gary.frost@gapac.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  Signature <u>12 MAY 2013</u> Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

- For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
- For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- The designated representative at an Acid Rain source or CAIR source.

3. Application Responsible Official Mailing Address...

Organization/Firm:

Street Address:

City:

State:

Zip Code:

4. Application Responsible Official Telephone Numbers...

Telephone: () ext. Fax: ()

5. Application Responsible Official E-mail Address:

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature

Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Margarete M. Vest Registration Number: 42794
2. Professional Engineer Mailing Address... Organization/Firm: Georgia-Pacific LLC Street Address: 1401 North Cove Court City: Fleming Island State: FL Zip Code: 32003
3. Professional Engineer Telephone Numbers... Telephone: (904) 445-8761 ext. Fax: (404) 749-2750
4. Professional Engineer E-mail Address: mmvest@gapac.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>Margarete M. Vest</i> Signature #42794 (seal) 5/12/13 1401 North Cove Ct Fleming Island, FL Date <u>5/12/13</u>

Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 434.0 North (km) 3,283.4		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 29 / 41 / 00 Longitude (DD/MM/SS) 81 / 40 / 45	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 26	6. Facility SIC(s): 2611 2621
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Ron Reynolds, Environmental Engineer – Air Quality
2. Facility Contact Mailing Address... Organization/Firm: Georgia-Pacific Consumer Operations LLC Street Address: P.O. Box 919 City: Palatka State: FL Zip Code: 32178
3. Facility Contact Telephone Numbers: Telephone: (386) 329-0967 ext. Fax: (386) 328-0014
4. Facility Contact E-mail Address: ron.reynolds@gapac.com

Facility Primary Responsible Official

Complete if an “application responsible official” is identified in Section I that is not the facility “primary responsible official.”

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () ext. Fax: ()
4. Facility Primary Responsible Official E-mail Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Figure 1-2 <input type="checkbox"/> Attached, Document ID: <input checked="" type="checkbox"/> Previously Submitted, Date: May 12, 2011
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: Figure 2-18 <input type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

- | |
|---|
| 1. List of Exempt Emissions Units:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility) |
|---|

Additional Requirements for Title V Air Operation Permit Applications

- | |
|---|
| 1. List of Insignificant Activities: (Required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application) |
| 2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
<input type="checkbox"/> Attached, Document ID: _____
<input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements) |
| 3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
<input type="checkbox"/> Attached, Document ID: _____
<p>Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.</p> |
| 4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____
<input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed
<input type="checkbox"/> Not Applicable |
| 5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
| 6. Requested Changes to Current Title V Air Operation Permit:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a CAIR source)

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

Section [1] of [1]

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Converting Area (EU050) (12 converting lines)

3. Emissions Unit Identification Number: **050**

4. Emissions Unit Status Code: A	5. Commence Construction Date: August 2013	6. Initial Startup Date: September 2013	7. Emissions Unit Major Group SIC Code: 26
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8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

The Mill is planning to replace the three baghouse units (each unit rated at 69,000 dscfm, for a total of 207,000 dscfm) that control particulate matter emissions from the 12 converting lines with three drum filtering units, each with the same exhaust flow rating as the baghouse units, or 69,000 dscfm each.

The Mill plans to replace one of the three baghouse units in August 2013, the second baghouse unit in September 2013, and the third baghouse unit in October 2013.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Drum Filtering System

2. Control Device or Method Code: **007**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [1] of [1]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate:
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8,760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [1] of [1]

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Figure 2-18		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: There will be one emission point for each of the three sections of the drum filtering units			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: 050			
5. Discharge Type Code: H	6. Stack Height: not yet determined	7. Exit Diameter: not yet determined	
8. Exit Temperature: 90 °F (estimate)	9. Actual Volumetric Flow Rate: 229,850 acfm (estimate)	10. Water Vapor: 7 % (estimate)	
11. Maximum Dry Standard Flow Rate: 207,000 dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

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D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): Paper converting operation		
2. Source Classification Code (SCC): 30700409 Paper & Paperboard Manufacturing		3. SCC Units: Air-dried tons manufactured
4. Maximum Hourly Rate: 37.8 air-dried tons/hr	5. Maximum Annual Rate: 330,952 air-dried tons/yr	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment:		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

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E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	Drum filter-not in list of codes	N/A	NS
PM ₁₀	Drum filter-not in list of codes	N/A	NS
PM _{2.5}	Drum filter-not in list of codes	N/A	NS

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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Particulate Matter—PM

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.3 lb/hour 23.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.003 grains/dscf Reference: Engineering estimate		7. Emissions Method Code: 5	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: 5 years 10 years	
10. Calculation of Emissions: $PM\text{-filterable (lb/hr)} = 0.003 \text{ grains/dscf} \times 207,000 \text{ dscf/min} \times 60 \text{ min/hr} \times 1 \text{ lb} / 7,000 \text{ grains} = 5.3 \text{ lbs/hr}$ $PM\text{-filterable (tons/yr)} = 5.3 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton} / 2,000 \text{ lbs} = 23.2 \text{ tons/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment:			

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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Particulate Matter--PM**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -****ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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Particulate Matter—PM₁₀

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.65 lb/hour 11.6 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 50% of PM filt. lb/hr Reference: Engineering Estimate		7. Emissions Method Code: 5	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: 5 years 10 years	
10. Calculation of Emissions: PM₁₀-filterable (lb/hr) = 50 % of PM filterable or 5.3 lbs/hr = 2.65 lbs/hr PM₁₀-filterable (tons/yr) = 2.65 lbs/hr x 8,760 hrs/yr x 1 ton / 2,000 lbs = 11.6 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment:			

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POLLUTANT DETAIL INFORMATION

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Particulate Matter—PM₁₀

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -

ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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Particulate Matter—PM_{2.5}

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM_{2.5}		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.1 lb/hour 9.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 40% of PM filt. Reference: Engineering estimate		7. Emissions Method Code: 5	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: 5 years 10 years	
10. Calculation of Emissions: PM_{2.5}-filterable (lb/hr) = 40 % of PM filterable or 5.3 lbs/hr = 2.1 lbs/hr PM_{2.5}-filterable (tons/yr) = 2.1 lbs/hr x 8,760 hrs/yr x 1 ton / 2,000 lbs = 9.2 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment:			

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Particulate Matter—PM_{2.5}

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -

ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

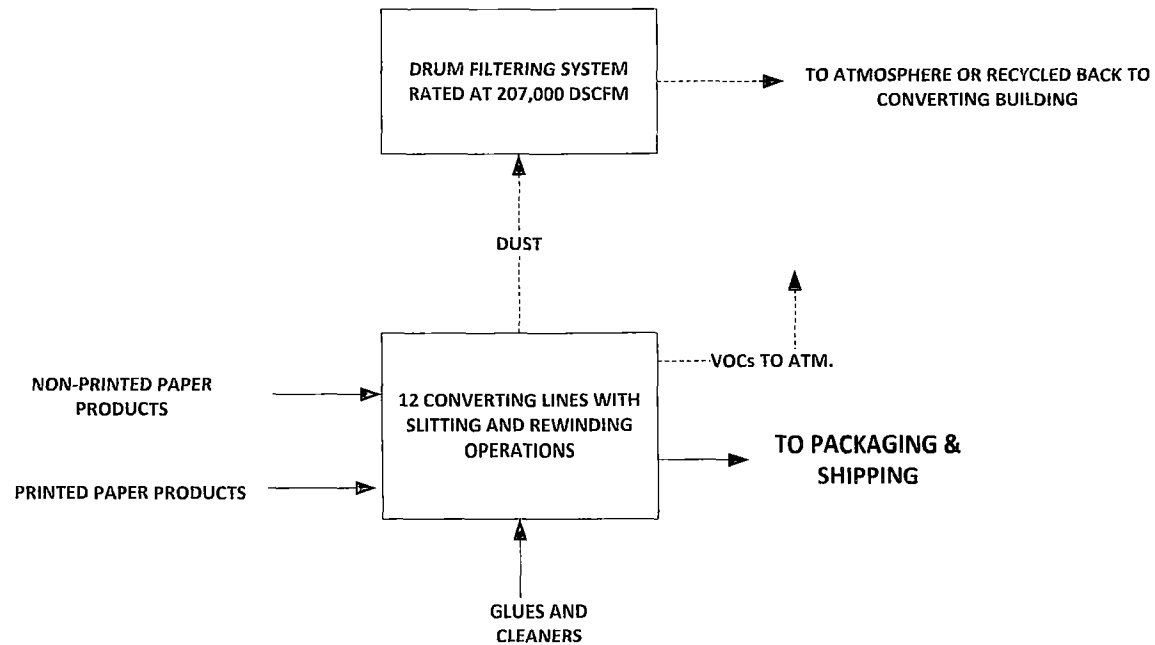
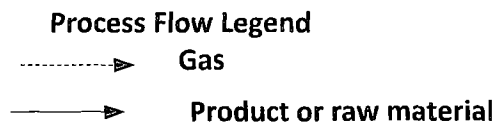


Figure 2-18a
Process Flow Diagram
Converting Department



Georgia-Pacific Consumer Products LLC
Palatka, Fl Mill
Replacement of Baghouse for 12 Converting Lines with
Drum Filtering System
Revised May 2013

Emission Calculations for New Drum Filtering System

Background Information:

The Mill is proposing to replace the existing "Kleissler Vibratube" baghouse that controls particulate matter (PM) emissions from 12 converting lines with a new drum filtering system. The existing baghouse is actually made-up of three distinct sections, with each section rated at 69,000 dscfm of air flow from the converting lines. The total exhaust air flow from the three baghouse sections is 207,000 dscfm. The estimated maximum PM-filterable emission rate for the existing baghouse is 0.005 grains/dscf, which converts to a PM-filterable emission rate of 8.9 lbs/hr as shown below:

$$\text{lbs/hr} = 0.005 \text{ grains/dscfm} \times 207,000 \text{ dscf} \times 60 \text{ min/hr} \times 1 \text{ lb}/7,000 \text{ grains} = 8.9 \text{ lbs/hr}$$

$$\text{tons/yr} = 8.9 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton} / 2,000 \text{ lbs} = 38.9 \text{ tons/yr}$$

We assumed that the quantity of PM₁₀ and PM_{2.5} filterable particulate matter exiting the baghouse was equal to the PM filterable emission rate, or 8.9 lbs/hr and 38.9 tons/yr.

Due to the low moisture content of the exhaust gases from the converting lines and the fact that no chemicals are added in the converting process that would lead to the formation of condensable particulate matter (CPM), we have assumed there is no CPM present in the exhaust gases leaving the baghouse.

Emission Calculations for New Drum Filtering System

Based on limited testing on one drum filtering system that controls particulate matter emissions from a tissue converting line at another GP facility, we believe the new drum filtering system for the Palatka Mill's 12 converting lines can achieve an outlet grain loading of 0.003 grains/dscf or less for PM, PM₁₀, and PM_{2.5} emissions. Additionally, based on the testing conducted at GP's other tissue mill, we expect that the PM₁₀ filterable emissions will be equal to or less than 50% of the PM filterable emissions and the PM_{2.5} filterable emissions will be equal to or less than 40% of the PM filterable emissions.

Therefore, the estimated total potential PM, PM₁₀, and PM_{2.5} emissions from the new drum filtering system can be calculated as shown below:

$$\begin{aligned} \text{Total PM (lb/hr)} &= 0.003 \text{ grains/dscf} \times 207,000 \text{ dscf/min} \times 60 \text{ min/hr} \times 1 \text{ lb} / 7,000 \text{ grains} \\ &= 5.3 \text{ lbs/hr} \end{aligned}$$

$$\text{Total PM (tons/yr)} = 5.3 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton} / 2,000 \text{ lbs} = 23.2 \text{ tons/yr}$$

$$\text{Total PM}_{10} \text{ (lb/hr)} = 50 \% \text{ of PM filterable or } 5.3 \text{ lbs/hr} = 2.65 \text{ lbs/hr}$$

Total PM₁₀ (tons/yr) = 2.65 lbs/hr x 8,760 hrs/yr x 1 ton / 2,000 lbs = 11.6 tons/yr

Total PM_{2.5} (lb/hr) = 40 % of PM filterable or 5.3 lbs/hr = 2.1 lbs/hr

Total PM_{2.5} (tons/yr) = 2.1 lbs/hr x 8,760 hrs/yr x 1 ton / 2,000 lbs = 9.2 tons/yr

Again, we have assumed there will not be any CPM emissions present in the exhaust gas stream from the new drum filtering system, so no CPM emissions have been added to any of the PM/PM₁₀/PM_{2.5} filterable emission rates to determine the total PM/PM₁₀/PM_{2.5} emission rates.