



Palatka Pulp and Paper Operations  
*Consumer Products Division*

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

September 9, 2013

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

**Re: Georgia-Pacific Consumer Operations LLC  
Palatka Mill, Facility ID No. 1070005  
No. 4 Lime Kiln Dust Collector 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). The Palatka Mill operates under Title V Air Operating Permit No. 1070005-076-AV, which was issued by the Florida Department of Environmental Protection (FDEP) on May 29, 2013. The Palatka Mill is proposing to modify the No. 4 Lime Kiln dust collector at the recommendation of the manufacturer in order to increase gas velocity and improve the collection efficiency of the dust collector. This work will be completed during the annual maintenance outage of the lime kiln which is planned for the first week of October, 2013.

The No. 4 Lime Kiln (EU No. 017) is authorized to burn natural gas or fuel oil in order to recalcine spent lime mud (calcium carbonate) into quicklime (calcium oxide), which is used to convert green liquor to cooking liquor. The maximum permitted rates are 41.5 tons of lime mud solids per hour and 130 MMBtu per hour, both on a 24 hour average basis. Particulate matter (PM) emissions are controlled by a cyclonic dust collector followed by a venturi scrubber.

A recent study of the pressure drop across the dust collector determined that the particulate matter control efficiency can be increased by increasing the pressure drop. The vendor recommends that some (the exact number will be reported separately upon receipt of final report) of the 16 dust collector tubes be plugged off in order to increase the pressure drop. The overall result will be an increase in flue gas velocity through the cyclones, which should increase the efficiency of the mechanical dust collector.

The proposed change will not result in any increase in projected emissions or production rate of the No. 4 Lime Kiln, and in fact is intended to decrease emissions. Pursuant to Rule 62-4.040(1)(b), the Palatka Mill respectfully requests a case-by-case permitting exemption from an

air construction (AC) permit for the proposed changes to the dust collector system. An exemption (project 1070005-077-AC) was issued December 12, 2012 for a similar dust collector modification on the No. 4 Combination Boiler. That exemption document is attached for reference.

The project is scheduled to be completed during the annual outage that begins September 29, pending receipt of exemption from the FDEP.

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 flourish extending to the right.

Gary L. Frost  
Vice President

Attachment

cc: Jim Eckenrode, Georgia-Pacific Consumer Operations LLC (Palatka, Florida)  
Mark Ruppel, Georgia-Pacific Consumer Products LP (Atlanta, Georgia)  
Tammy McWade, FDEP, DARM, OPC (Tallahassee)



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

*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: Exemption from the Requirement to Obtain an Air Construction Permit  
Georgia-Pacific Palatka Mill  
Project No. 1070005-077-AC  
Dust Collection System Flow Velocity Increase

Dear Mr. Frost:

This is a response to your letter dated December 5, 2012 requesting the authority to plug off 14 of the dust collector tubes in the No 4 Combination Boiler dust collection system. After plugging these tubes, 34 active tubes will remain in the dust collection system. The result of plugging the tubes will be an increase in flue gas velocity through the dust collection system (cyclones), which should increase the efficiency of the mechanical dust collection system. This work is scheduled to take place at the Georgia-Pacific Palatka Mill located in Putnam County at 215 County Road 216 in Palatka, Florida. The permittee requested a case-by-case permitting exemption from an air construction (AC) permit for the proposed physical changes to the dust collection system.

**Determination:** Details of the project are provided in the attached letter dated December 5, 2012. On April 7, 2011, the Department issued Air Permit No. 1070005-066-AC. One of the projects authorized by this permit was the rebuild/modification of the existing mechanical dust collection system for the No. 4 Combination Boiler. The dust collector modification was completed in February of this year. Engineering testing after startup indicated that the efficiency across the dust collector did not meet the vendor-guaranteed levels. The vendor reviewed the test data and determined that the flue gas flow rates were less than predicted, and therefore the gas velocities through the dust collector cyclone tubes were less than ideal. The dust collector system works by centrifugal force, wherein dust particles due to their mass are brought into contact with the collectors walls where they are removed from the flue gas stream. Insufficient flow velocity decreases the efficient of the dust collection system. The proposed change will not result in any increase in projected emissions or steaming capacity of the No.4 Combination Boiler, and in fact is intended to decrease dust emissions.

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 AC permit. 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: 2600 Blair Stone Road, 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

[www.dep.state.fl.us](http://www.dep.state.fl.us)

## EXEMPTION FROM AIR CONSTRUCTION PERMITTING

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



Syed Arif  
2012.12.12 12:16:46  
-05'00'

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

JFK/sa/dlr

EXEMPTION FROM AIR CONSTRUCTION PERMITTING

---

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter of Exemption 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 the date indicated below to the following persons.

Mr. Gary Frost, Georgia-Pacific Consumer Operations, LLC ([gary.frost@gapac.com](mailto:gary.frost@gapac.com))  
Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC ([ron.reynolds@gapac.com](mailto:ron.reynolds@gapac.com))  
Mr. Khalid AlNahdy, DEP Northeast District Office ([khalid.alnahdy@dep.state.fl.us](mailto:khalid.alnahdy@dep.state.fl.us))  
Ms. Barbara Friday, DEP OPC ([barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us))  
Ms. Lynn Searce, DEP OPC Reading File ([lynn.searce@dep.state.fl.us](mailto: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.

Lynn Searce  
2012.12.12 14:42:52 -05'00'