



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
AUG 30 1995

Bureau of
Air Regulation

4APT-AEB

AUG 28 1995

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Georgia-Pacific Corporation (G-P), Palatka, Putnam County,
Florida (PSD-FL-226)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the proposed major modification to the above referenced kraft pulp mill facility by your letter dated August 1, 1995. Additional information regarding emissions netting calculations, proposed recovery boiler and total reduced sulfur (TRS) incinerator emission limits, electrostatic precipitator (ESP) upgrade viability, and black liquor solids content, was also received by your letters dated May 17, and July 5, 1995. The proposed major modification consists of the replacement of two existing digesters (Nos. 11 and 12) with two larger digesters. Sixteen screen tube banks will also be added to the existing No. 4 recovery boiler (RB4). Other physical changes at the facility include the addition of a new chip conditioner system, white liquor heater, and automatic lime mud filter cleaner. The existing brown stock washer system will not be physically modified.

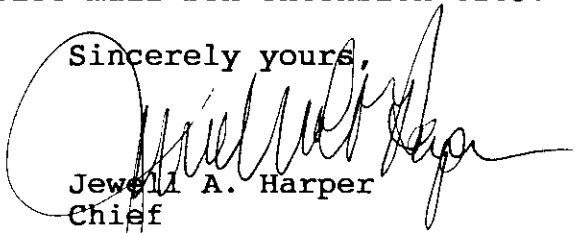
G-P expects pulp production to increase approximately 40 tons per day (TPD) using the larger digesters. The pulp production capacity of the existing digester system is 1850 TPD. G-P also expects about a 4 percent increase in black liquor solids (BLS) throughput with the RB4 modification. The solids content of the black liquor will range from 66 to 68 percent. Current permitted RB4 capacity is 5.04 million pounds of BLS per day. Space limitations prohibit the installation of additional transformer-rectifier sets on the existing ESP system. As discussed between Mr. Willard Hanks of your staff and Mr. Stan Kukier of my staff on August 9, 1995, we have reviewed the package as submitted, including all additional information, and have no adverse comments.

We agree that a combination of a packed tower wet scrubber and an incinerator may be considered representative of Best Available Control Technology (BACT) for control of digester system TRS emissions. ESP technology and good combustion practices may also be considered representative of BACT for control of recovery boiler particulate and beryllium emissions. Good combustion practices can be considered representative of BACT for control of recovery boiler carbon monoxide (CO) and volatile organic compound (VOC) emissions. We also agree that combustion control may be considered representative of BACT for control of recovery boiler nitrogen oxides (NO_x) and TRS emissions. The recovery boiler NO_x emission limit of 80 parts per million on volume dry basis (ppmvd) corrected to 8 percent oxygen (O₂) indicated in the draft permit is lower than the 100 ppmvd corrected to 8 percent O₂ NO_x emission limit originally requested by the applicant. Permit conditions limit pulp production capacity to 1,850 TPD of air dried unbleached pulp (ADUP). The TRS incinerator is also required to operate at a minimum temperature of 1,200 degrees Fahrenheit (°F) with a minimum residence time of 0.5 seconds. Permit conditions limit the RB4 BLS feed rate to 210,000 pounds per hour (lbs/hr).

The new batch digester system will be subject to the requirements of 40 CFR Part 60, Subpart BB - Standards of Performance for Kraft Pulp Mills.

Thank you for the opportunity to comment on this package. If you have any questions, please contact Mr. Stan Kukier of my staff at (404) 347-3555, voice mail box extension 4143.

Sincerely yours,



Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

W. Hanks
cc: O. Holladay
NED



Georgia-Pacific Corporation

Palatka Operations
Packaged Products Division
P.O. Box 919
Palatka, Florida 32178-0919
Telephone (904) 325-2001

August 18, 1995

PSD-FC-L74

RECEIVED
AUG 23 1995

Bureau of
Air Regulation

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Al Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

We appreciate the considerable time and effort expended by the Department in reviewing the application for an air construction permit to modify our facility. The following are minor comments concerning the Technical Evaluation and Preliminary Determination, BACT Determination, and draft permit dated August 1, 1995.

Both the Technical Evaluation and draft permit state that the federally-enforceable pulping production limit is 118 tons per hour and 1,850 tons per day (TPD) of air-dried unbleached pulp (ADUP). For accounting reasons explained below, we verify the daily average pulp production at the end of the month. The daily pulp production is calculated throughout the month based on an estimated wood yield, which is somewhat dependent on season, weather, age of harvested wood, etc. At the end of the month, the wood yield is adjusted to reflect actual conditions. We request the Department clarify that the federally-enforceable daily production limit of 1,850 TPD ADUP is based on a monthly averaging time to accommodate our accounting constraints.

There is a typographical error on Page 6 of the Technical Evaluation. I believe the Department's proposed emission limit for SAM from the TRS Incinerator is 82.2 TPY.

The maximum emissions for all pollutants emitted by the project shown in Table 1 were proposed by G-P in the application, which of course does not reflect the emission limits proposed by the Department in the draft permit.

AL LINERO, P.E.
Page Two
August 18, 1995

It is our understanding that TRS is not an air toxic, although some components of TRS are on the DEP air toxic list.

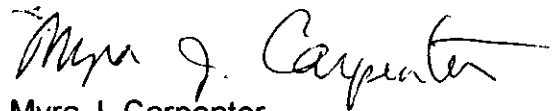
In the BACT Determination, the emissions from the digester system and recovery boiler were summarized in a table. Please clarify whether particulate matter includes both PM and PM₁₀ in the table.

There is a typographical error on the first page of the draft permit where statutes is misspelled.

In Specific Condition No. 5, the emission factor for SO₂ should be 5.085 lbs. S/ton ADUP at 50% control efficiency. The typographical error for the SAM emission limit is repeated. I believe the limit should read 82.2 TPY.

Thank you for your consideration in this matter. If you have any questions, please call me at 904-329-0918.

Sincerely,



Myra J. Carpenter
Environmental Superintendent

kb

cc: Willard Hanks, FDEP, BAR
B. T. Champion, GA030, G-09
W. L. Baxter
Henry Hirschman

cc: W. Hanks
C. Helladay
NED
EPA
NPS

PATSU 266676

APPLICATION TRACKING SYSTEM STANDARD INFORMATION 09/21/95

APPL RECVD:03/09/95 TYPE CODE:AC SUBCODE:1A LAST UPDATE:08/16/95

DER OFFICE RECVD:BAQ DER OFFICE TRANSFER TO: APPLICATION COMPLETE:05/17/95

DER PROCESSOR:HANKS/HOLLADAY

APPL STATUS:IS DATE:07/27/95 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUE/GENERAL=GP)

RELIEF: (SSAC=SS/EXEMPTIONS=EX/VARIANCE=VA)

(Y/N) N MANUAL TRACKING

DISTRICT:31 COUNTY:54

(Y/N) N OGC HEARING REQUESTED

LAT/LONG:29.41.00/81.40.45

(Y/N) Y PUBLIC NOTICE REQD?

BASIN-SEGMENT: .

(Y/N) N GOV BODY LOCAL APPROVAL REQD?

COE #: _____

(Y/N) Y LETTER OF INTENT REQD? (I/ISSUE D/DENY)

ALT#:PSD-FL-226

PROJECT SOURCE NAME:DIGESTER SYSTEM/RECOVERY BOILER MOD

STREET:S.R. 216

CITY:PALATKA

STATE:FL

ZIP:32178

PHONE:904-325-2001

APPLICATION NAME:GEORGIA-PACIFIC

STREET:POST OFFICE BOX 919

CITY:PALATKA

STATE:FL

ZIP:32178

PHONE:904-325-2001

AGENT NAME:DAVID A. BUFF, P.E.

STREET:1034 NORTHWEST 57TH STREET

CITY:GAINESVILLE

STATE:FL

ZIP:32605

PHONE:904-331-9000

FEE #1 DATE PAID:03/09/95 AMOUNT PAID:07500 RECEIPT NUMBER:00224297

TAB TO HERE: _

APPLICATION NUMBER:266676

APPLICATION TYPE:AC

A DATE APPLICATION WAS RECEIVED - - - - - 03/09/95

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - - - ___/___/___

C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - ___/___/___--___/___/___

E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 03/29/95--04/14/95

E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 03/29/95--04/18/95

E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 03/29/95--04/24/95

E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 03/29/95--05/17/95

E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - ___/___/___--___/___/___

E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - ___/___/___--___/___/___

F DATE LAST 45 DAY LETTER WAS SENT - - - - - ___/___/___

G DATE FIELD REPORT WAS REQ--REC - - - - - ___/___/___--___/___/___

H DATE DNR REVIEW WAS COMPLETED - - - - - ___/___/___

I DATE APPLICATION WAS COMPLETE - - - - - 05/17/95

K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - - 08/02/95--08/04/95

L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - - 08/02/95

M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - - - ___/___/___

N WAIVER BEGIN DATE--END DATE (DAY 90) - - - - - ___/___/___--___/___/___

TAB TO HERE: _



Georgia-Pacific Corporation

Palatka Operations
Packaged Products Division
P.O. Box 919
Palatka, Florida 32178-0919
Telephone (904) 325-2001

August 14, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED

AUG 18 1995

Mr. Al Linero, P.E.
Administrator, New Source Review
Florida Dept. of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Bureau of
Air Regulation

RE: Construction Permit AC 54-266676 (PSD-FL-226)
Modification of Kraft Pulp Mill
Georgia-Pacific Corporation, Palatka Mill
Putnam County

Dear Mr. Linero:

Enclosed is the notarized copy of the Notice of Intent to Issue Permit which was published on August 8, 1995 in our local newspaper. This public notice was for the issuance of construction permit AC 54-266676 (PSD-FL-226) for the modification of the pulping and recovery operations located at the Palatka mill.

If you have any questions, please call me at (904) 325-2001, Extension 5918.

Sincerely,

Myra Carpenter
Environmental Superintendent

kp

w/o enclosure

cc: W. L. Baxter
B. T. Champion , GA030-09
H. Hirschman

cc: Willard Hanks ✓
Cleve Holladay ✓
David Bugg ✓
EPA ✓
NPS ✓

NED ✓

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO
ISSUE PERMIT

AC 54-266676
PSD-FL-226

The Department of Environmental Protection (Department) gives notice of its intent to issue a construction permit, No. AC 54-266676/PSD-FL-226, to Georgia-Pacific Corporation for a modification of its Kraft pulp mill located in Palatka, Putnam County, Florida. The project is primarily a continuation of modernization and efficiency improvements at the plant rather than a major expansion of capacity. The modification consists of replacement of the last two of thirteen digesters with modern, larger units; installation of furnace screen tubes in the recovery boiler to cool combustion gases; installation of a new wood chip conditioner system; replacement of the white liquor heater; and installation of an automatic cleaning system

on the lime mud filter. Although this permit does not authorize an increase in the allowable production, the mill, if operated at its permitted production rate, has the potential to increase actual emissions by 300.0 tons per year (TPY) Particulate matter (PM/PM10), 36.1 TPY sulfur dioxide (SO2), 626.0 TPY nitrogen oxides (NOx), 1022.5 TPY carbon monoxide (CO), 322.2 TPY volatile organic compounds (VOC), 88.5 TPY total reduced sulfur (TRS), 0.04 TPY lead, 0.009 TPY mercury, and 0.0011 TPY beryllium (Be). Sulfuric acid mist (SAM) emissions will decrease by 12.4 TPY. The increase in the allowable emissions of PM/PM10, NOx, CO, VOC, TRS, and Be are above the significant emission rates and subjects the proposed modification to the Prevention of Significant Deterioration (PSD) new source review regulations. The allowable emissions of these pollutants are set by a Best Available Control Technology (BACT) determination.

The maximum predicted increases in particulate matter less than 10 microns (PM10) concentrations and nitrogen dioxide (NO2) concentrations due to the project are less than the respective PSD Class I and Class II significant impact levels. Thus, no PSD PM10 or NO2 increment consumption was calculated for this project.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days

STATE OF FLORIDA \
 : SS:
County of Putnam /

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Daily News is a daily newspaper of general circulation, printed in the English Language and published in the City of Palatka, in said County and State: and that the attached order, notice, publication and/or advertisement:

Legal No. 29361
PUBLICNOTICESTATE OF FLORIDADEPARTMENT O

was published in said newspaper 1 time(s), said publication being made on the following dates:
8/8/95

The Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, publication and/or advertisement.

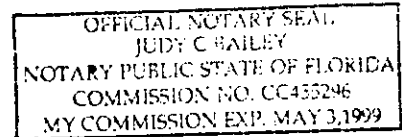
Mary Kaye Wells

Sworn to and subscribed before me this 08/08/95 by Mary Kaye Wells, Classified Advertising Manager of the Daily News, a Florida corporation, on behalf of the corporation.

Judy C. Bailey
Judy C. Bailey, Notary Public,
State of Florida

NOTARY SEAL
SEAL OF OFFICE:

Personally known to me, or
 Produced Identification:
 Did take an oath



Ma-Pacific Corp.

AC54-266676 - PSD - FI-226

Rec'd
8/18

of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application, have the right to petition to become a party to the proceeding. The

petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive,
Suite 4
Tallahassee, Florida 32301

Department of
Environmental Protection
Northeast District
7825 Baymeadows Way
Suite B200
Jacksonville, Florida
32256-7577

Any person may send written comments on the proposed action to Administrator, New Source Review, at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such request must be submitted within 30 days of this notice.
8/8/95 Legal No. 29361