

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee			
To: _____	Loctn.: _____		
To: _____	Loctn.: _____		
To: _____	Loctn.: _____		
From: _____	Date: _____		
Reply Optional []	Reply Required []	Info. Only []	
Date Due: _____	Date Due: _____		

TO: Permit File AC 54-43773
AC 54-43791
AC 54-43795

THRU: Clair Fancy
Bill Thomas
Larry George *LM*

FROM: Bruce Mitchell *BM*

DATE: August 28, 1981

SUBJECT: Preliminary Rule Applicability - Georgia-Pacific, Inc.
Putnam County

Three applications for Permits to Construct were submitted to the Bureau of Air Quality Management on June 8, 1981, by Georgia-Pacific, Inc. (G-P). The applications are undergoing completeness review; day 30 is September 3, 1981.

The proposed project consists of a plant expansion at G-P's kraft pulp mill in Putnam County near Palatka which will double production to 2,400 tons per day of unbleached pulp. The expansion will include five new sources of air pollution: a recovery boiler and two associated smelt tanks (AC 54-43795), a lime kiln (AC 54-43773), and a combination boiler fired by bark and peat (AC 54-43791).

The G-P mill is in an area designated attainment for all criteria pollutants. It is more than 50 km from any particulate matter (PM) or SO₂ nonattainment area and more than 100 km from any Class I area.

The potential and projected emissions for the proposed project are listed in the following table.

<u>Pollutant</u>	<u>Potential (uncontrolled) Emission Rate (tons/year)</u>	<u>Applicant's Projected Actual Emission Rate (tons/year)</u>
PM	85,678	1,441
SO ₂	4,046	3,341
NO _x	1,918	1,765
VOC	634	591
CO	7,123	6,855
Total Reduced Sulfur (TRS)	3,197	32

Since the proposed project is a physical change to an existing major emitting facility which would result in an increase in potential emissions of either PM or SO₂ over the baseline, it constitutes a modification subject to review under State prevention of significant deterioration (PSD) regulations (17-2.04(6), FAC). (In this case, potential emissions of both PM and SO₂ will increase, but only SO₂ concentrations will increase over the baseline. The post-1974 shut-down of lime kilns 1-3 and recovery boilers 1-3 at the mill have expanded the PSD increment such that PM emissions from the proposed project will not result in concentrations over the baseline). PSD review consists of a determination of best available control technology (BACT) for all pollutants emitted and an air quality impact analysis to demonstrate that the project would not cause or contribute to a violation of any ambient air quality standard or PSD increment.

In addition, the combination boiler is subject to a visible emissions (VE) standard and emission limiting standards for PM, SO₂, and NO_x under the adopted federal new source performance standards (NSPS) for fossil-fuel steam generators (17-2.21(2)(a), FAC). The BACT determination for these emissions from the boiler must be at least as stringent as the applicable NSPS. Although not yet adopted at the State level, the federal NSPS for kraft pulp mills (40 CFR 60.280, Subpart BB) will be considered in the BACT determination for PM and TRS emissions from the recovery boiler, smelt tanks and lime kiln.

Page Three
August 28, 1981

APPROVED:

L. George 9/3/81
L. George DATE

B. Thomas 9/18/81
B. Thomas DATE

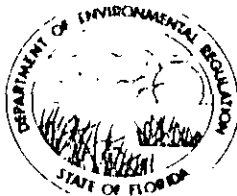
C. Fancy 4/21/81
C. Fancy Date

BM:jr

cc: J. Ketteringham

DEPARTMENT OF ENVIRONMENTAL REGULATION

WIN TOWERS OFFICE BUILDING
600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

July 2, 1981

Mr. Roger C. Sherwood
Technical Director
Georgia Pacific Corporation
P. O. Box 919
Palatka, Florida 32077

RE: Permit Applications AC 54-43773, AC 54-43791, and
AC 54-43795

Dear Mr. Sherwood:

We have reviewed your applications submitted June 2, 1981, for permits to expand your mill at Palatka and have found several discrepancies in the air quality analysis. Until these discrepancies are corrected we must rule the applications incomplete on the grounds that we do not have reasonable assurance that the project would not cause or contribute to a violation of ambient air quality standards or PSD increments. The discrepancies are as follows:

SO₂ Short-Term Analysis

- o According to Table 4-2, Lime Kilns #1, #2, and #3 should have been modeled at .03, .03, and .06 g/s, not .24, .24, and .48 g/s as shown in the printouts.
- o According to Table 4-2, Power Boiler #4 should have been modeled at 358.86 g/s, not 45.21 g/s.
- o On the five year ISCST runs, source group #2, should not have included source #22, but should have included source #'s 11, 20, and 21.
- o On the refined ISCST runs, source group #1 should not have included source #22, but should have included source #'s 11, 21, and 23.

Mr. Roger Sherwood
Page Two
July 2, 1981

TSP Short-Term Analysis

- o On the five-year ISCST runs, source group #3 should have included source #'s 17-20, not #17 alone.

Long-Term Analysis

- o A key to the sources modeled is needed to verify the emission rates and source groupings used.

If you have any questions on the above comments or wish to discuss them in detail, please telephone Larry George at (904) 488-1344.

Sincerely,

[Handwritten signature]

Steve Smallwood, P.E.
Chief
Bureau of Air Quality Management

SS:LG:caa

cc: J. Cole, St. Johns River Subdistrict



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

June 30, 1981

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Mitchell:

Pursuant to our conversation of June 30, 1981, please change the operating time in the permit applications AC54-43773, AC54-43791, and AC54-43795 to read 52 weeks/year.

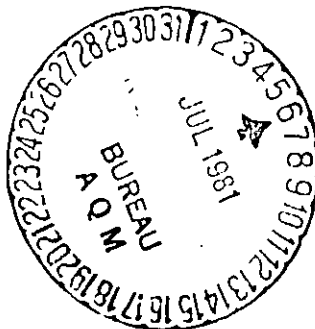
If I can be of further service, please contact me.

Sincerely,

Vernon L. Adams
Supervisor of
Environmental Affairs

mg

cc D. A. Buff, ESE, Gainesville
R. C. Sherwood





Georgia-Pacific Corporation

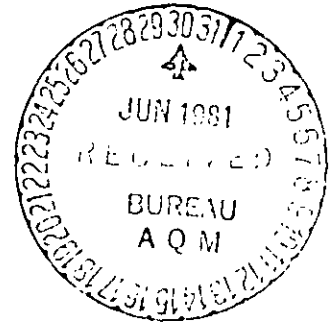
Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

John

June 26, 1981

Mr. Clair Fancy
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301



Dear Mr. Fancy:

In response to the Department's concern about odor control for new miscellaneous sources associated with the mill's expansion, I would like to assure you that G-P will comply fully with the New Source Performance Standards wherever they apply.

Current plans, though preliminary, are to incinerate the odoriferous gases in the lime kiln.

If I can be of further service, please let me know.

Sincerely,

Vernon L. Adams
Supervisor of
Environmental Affairs

mg

cc Mr. R. C. Sherwood
Mr. D. A. Buff

AC 54-43773
54-43791
54-43795
PSD-FL-079

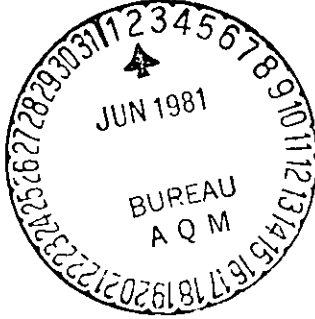


Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary
P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

June 1, 1981

Mr. Steve Smallwood
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301



Dear Mr. Smallwood:

Please find enclosed construction permit applications for three proposed air pollution sources at Georgia-Pacific's Palatka mill. These applications are submitted for processing under the State regulations and under Federal Prevention of Significant Deterioration procedures.

If you have any questions or comments concerning the applications please feel free to contact me, or Vernon Adams, at 904/325-2001. Dave Buff of ESE is also available to answer questions at 904/372-3318.

Sincerely,

Roger C. Sherwood
Technical Director

mg
enclosures

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#0000000043773 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
FILE NAME:GA-PACIFIC CORP DATE FIRST REC: 06/02/81 APPLICATION TYPE:AC
APPL NAME:R. C. SHERWOOD APPL PHONE:(904)325-2001 PROJECT COUNTY:54
ADDR:P. O. BOX 949 CITY:PALATKA ST:FLZIP:32077
AGNT NAME:BUFF AGNT PHONE:(904)372-3318
ADDR:P. O. BOX 856 CITY:GAINESVILLE ST:FLZIP:32604

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

*** RECORD HAS BEEN SUCCESSFULLY UPDATED *** 06/02/81 16:15:42

FEE PD DATE#1:06/02/81 \$0020 RECEIPT#000033573 REFUND DATE: / / REFUND \$
FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:06/02/81
REMARKS:LINE KILN

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#0000000043791 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
FILE NAME:GA-PACIFIC DATE FIRST REC: 06/02/81 APPLICATION TYPE:AC
APPL NAME:R. C. SHERWOOD APPL PHONE:(904)325-2001 PROJECT COUNTY:54
ADDR:P. O. BOX 949 CITY:PALATKA ST:FLZIP:32077
AGNT NAME:DAVID BUFF AGNT PHONE:(904)372-3318
ADDR:P. O. BOX 856 CITY:GAINESVILLE ST:FLZIP:32604

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

*** RECORD HAS BEEN SUCCESSFULLY UPDATED *** 06/02/81 16:17:26

FEE PD DATE#1:06/02/81 \$0020 RECEIPT#000033573 REFUND DATE: / / REFUND \$
FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:06/02/81
REMARKS:COMBINATION BOILER NO. 5 W/ESP

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE# 000000043795 COF# DER PROFESSOR: THOMAS DER OFFICE: TLH
 FILE NAME: GA-PACIFIC DATE FIRST REC: 06/92/84 APPLICATION TYPE: AC
 APPL NAME: SHERRWOOD APPL PHONE: () - PROJECT COUNTY: 54
 ADDR: CITY: ST: ZIP:
 AGNT NAME: AGNT PHONE: () -
 ADDR: CITY: ST: ZIP:

ADDITIONAL INFO REQ: / / / / / / / / / / / / / / / /
 APPL COMPLETE DATE: / / COMMENTS REC'D DATE REQ: / / DATE REC: / /
 LETTER OF INTENT REC'D: Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / / / / / / / / / / / /
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / / / / / / / / / / / /
 HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED: N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED 06/02/84 16:19:55
 FEE PD DATES 1: 06/02/84 \$4028 RECEIPT# 00003573 REFUND DATE: / / REFUND \$
 FEE PD DATES 2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
 APPL ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED: AC DATE: 06/02/84
 REMARKS: RECOVERY BOILER NO. 5

June 2 hard-delivered by applicant/consultant
 PSD analysis (applications) + 1 PSD/cover letter + (2 modeling data + 1 report)
 # copies + 1 PSD/cover letter + (2 modeling data + 1 report)
 L.G.

Distribution:

- Ed. Z. [unclear] ✓
- ~~copy to [unclear] Beach Co. Health Dept~~
- ~~copy to DER - St. Johns River Subdistrict~~
- review engineer ✓
- meteorologist ✓
- CAPS file ✓

More copies made ~~10~~ 10:

- ~~Ed. Z. [unclear]~~
- ~~P. [unclear] Health Dept.~~
- DER St. Johns River Subdist.
- 2 P.W. - state
- [unclear]
- EN. [unclear]

Georgia Pacific

5/18/81

proposed 1200 ton pulp expansion phone

CLAIR FANCY	FDER/BAQM	904 488 1344
Roger SHERWOOD	G.P./PALATKA	904 325 2001
David A. Buff	ESE	904/372-3318
Bill Blommel	DER/BAQM	
Bill Thomas	DER/BAQM	
Frank Watkins	FDER, Jacksonville	904/396-6959
John L. Cole	"	"
Larry George	DER/BAQM	(904) 488-1344
DON S. GEIGER	ESE	904 372-3318
Termon Adams	G-P	904-325-2001

See PSD-FL-079

for complete copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 33573

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Georgia-Pacific Corp Date 12/18/77

Address Palatka, FL 32909 Dollars \$ 457.50

Applicant Name & Address (above)

Source of Revenue _____

Revenue Code 10101 Application Number 43450 4575

By _____

Start CAPS hanging file:

{ Georgia-Pacific Corp }
{ Palatka }

4168
1981
12/18/77
457.50
4575
19/81/7
Georgia-Pacific Corp
Palatka, FL 32909
12/18/77
457.50
4575

1-1-11

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
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From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Steve Smallwood
Mary Clark

FROM: John Svec *JS*

DATE: February 10, 1981

SUBJ: Bubble Proposal of Georgia Pacific Company - Palatka Plant

As was requested at the Georgia Pacific bubble proposal meeting in Atlanta on February 5, 1981, Mr. Ken Young of EPA-Washington was contacted the next day and was given the details of the proposal. The following is the findings that Ken Young stated during our conversation on February 9, 1981.

First, it was pointed out that the source being in a PSD area was not an issue. Since he assumed the SIP demonstrated attainment through the use of allowable emissions and allowable emissions were not proposed to be increased, Ken Young said the proposal seemed to fit with current policy and could be allowed. He further stated that since similar stack sizes and proximity were involved, a modeling impact analysis would not be required.

However, Mr. Young stated that all the current bubble proposals received by EPA did not increase actual emissions. Also he stated that EPA was "not keen on promoting bubbles that increase actual emissions". He said that a proposal was received that would increase actual emissions but further discussions were held and the final proposal was submitted with no increase. Therefore, it seems that either policy that Florida uses would be backed by EPA. A response to the Georgia Pacific proposal still needs to be prepared.

Mr. Young also stated that the EPA Model Bubble Rule should be ready by Mid-March. However, due to the President's 90 day ban on new regulations, he was not sure when it could be printed in the Federal Register. Mr. Young further said that if the Department submitted a draft rule, his office would comment on it.

JS:dav

John Socc
File
Bubble
X Ga Pacific?

FILE #

New file
for bubble applications