

# Florida Department of Environmental Protection

## Memorandum

---

To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau of Air Regulation  
Jeff Koerner, New Source Review Section  
From: Bruce Mitchell, New Source Review Section  
Date: August 19, 2009  
Subject: Final Minor Source Air Construction Permit  
Project No. 1070005-061-AC  
Georgia-Pacific Consumer Operations LLC, Palatka Mill  
No. 4 Lime Kiln's Scrubber Modification Project

The final permit for this project is attached for your approval and signature. The project requires a minor air construction permit to authorize: the installation of a dual orifice impingement tray and a chevron mist eliminator in the scrubber's separator tank. The purpose is to try to improve the performance and particulate matter removal efficiency of the scrubber. The project will not change the throughput capacity of the No. 4 Lime Kiln. There are no projected actual emission increases of any pollutant due to this control system modification. The proposed work will be performed at the existing Palatka Mill, which is located in Putnam County, north of CR 216 and west of US 17 in Palatka, Florida. The project is not considered a new source review reform project.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

JK/tlv/jfk/rbm

## FINAL DETERMINATION

---

### PERMITTEE

Georgia-Pacific Consumer Products LLC  
P.O. Box 919  
Palatka, Florida 32178-0919

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Project No. 1070005-061-AC  
Palatka Mill  
No. 4 Lime Kiln Scrubber Modification

The project required a minor air construction permit to authorize the installation of a dual orifice impingement tray and a chevron mist eliminator in the scrubber's separator tank. The purpose is to try to improve the performance and particulate matter removal efficiency of the scrubber. The project will not change the throughput capacity of the No. 4 Lime Kiln. There are no projected actual emission increases of any pollutant due to this control system modification. The proposed work will be performed at the existing Palatka Mill.

### NOTICE AND PUBLICATION

The Department distributed an initial Intent to Issue Permit package on July 17, 2009. The applicant published the Public Notice of Intent to Issue in the Palatka Daily News on July 24, 2009. The Department received the proof of publication on July 29, 2009. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

### COMMENTS

No comments on the Draft Permit were received from the public, the Department's Northeast District Office, the EPA Region 4 Office or the applicant.

### CONCLUSION

The final action of the Department is to issue the permit as noticed with the noted correction.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit by:

Georgia-Pacific Consumer Operations LLC  
Post Office Box 919  
Palatka, Florida 32178-0919

Project No. 1070005-061-AC  
Palatka Mill  
No. 4 Lime Kiln Scrubber Modification

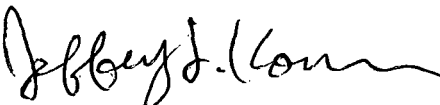
*Authorized Representative:*

Mr. Gary Frost, Vice President Operations

Georgia-Pacific Consumer Operations LLC operates the existing paper and pulp mill in Putnam County located North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. This final air construction permit authorizes the installation of a dual orifice impingement tray and a chevron mist eliminator in the scrubber's separator tank. The purpose is to try to improve the performance and particulate matter removal efficiency of the scrubber. The project will not change the throughput capacity of the No. 4 Lime Kiln. There are no projected actual emission increases of any pollutant due to this control system modification. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this 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

*For* 

Trina L. Vielhauer, Chief  
Bureau of Air regulation

\_\_\_\_\_  
(Date)

TLV/jfk/bm

**NOTICE OF FINAL PERMIT**

---


**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) 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 8/21/09 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC ([gary.frost@gapac.com](mailto:gary.frost@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. Wayne Galler, Georgia-Pacific Consumer Operations LLC ([wjgaller@gapac.com](mailto:wjgaller@gapac.com))
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC ([ron.reynolds@gapac.com](mailto:ron.reynolds@gapac.com))
- Mr. Chris Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Vickie Gibson, BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@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.

  
\_\_\_\_\_  
(Clerk)

8/21/09  
(Date)



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE:

Georgia-Pacific Consumer Operations LLC  
P.O. Box 919  
Palatka, Florida 32178-0919

Project No. 1070005-061-AC  
Palatka Mill  
No. 4 Lime Kiln Scrubber Modification  
SIC Nos. 2611 and 2621

### *Authorized Representative:*

Mr. Gary Frost, Vice President Operations

Permit Expires: July 1, 2011

## PROJECT AND LOCATION

This permit authorizes the installation of a dual orifice impingement tray and a chevron mist eliminator in the scrubber separator tank for the No. 4 Lime Kiln at the existing Palatka Mill, which is located in Putnam County, North of CR 216 and West of US 17, in Palatka, Florida. The map coordinates are UTM Zone 17, 434.0 km East and 3283.4 km North.

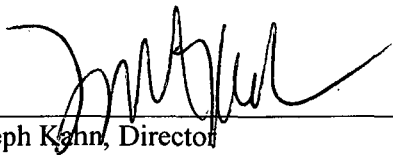
## STATEMENT OF BASIS

This minor source air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The project is subject to the general preconstruction review requirements of Rule 62-212.300, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida.

  
\_\_\_\_\_  
Joseph Kann, Director  
Division of Air Resource Management

8/21/09  
\_\_\_\_\_  
Effective Date

## SECTION 1. GENERAL INFORMATION

---

### FACILITY DESCRIPTION

The Palatka Mill is an existing pulp and paper mill. The existing mill uses the Kraft sulfate process in which the digesting liquor (white cooking liquor) is a solution of sodium hydroxide and sodium sulfide that is mixed with wood chips and cooked under pressure. The spent liquor, known as weak black liquor, is concentrated and sodium sulfate is added to make up for chemical losses. The black liquor solids (BLS) are burned in the recovery furnace to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide, which reconstitutes the cooking liquor. The spent lime cake (calcium carbonate) is recalcined in a rotary lime kiln to produce quicklime, which is used to process the green liquor to cooking liquor.

Steam and energy needs are met by the power boilers, which burn a variety of fuels including fuel oil and natural gas. The recovery boiler, lime kiln, and power boiler all fire fuels and produce products of incomplete combustion, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), sulfuric acid mist (SAM), sulfur dioxide (SO<sub>2</sub>), total reduced sulfur (TRS), and volatile organic compounds (VOC).

### PROJECT DESCRIPTION

Currently, particulate matter (PM) emissions from the existing No. 4 Lime Kiln are controlled by a cyclone followed in series by a wet venturi scrubber. To improve PM removal efficiency of the scrubber system, this permit authorizes installation of a dual orifice impingement tray and a chevron mist eliminator in the separator tank of the existing scrubber. The additional equipment will trap small particles in larger water droplets that will be removed from the exhaust. The proposed project will not change the applicability of any existing state or federal requirements.

### REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

## SECTION II. ADMINISTRATIVE REQUIREMENTS

---

1. **Permitting Authority:** All documents related to applications for permits to construct, operate or modify emissions unit shall be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection (Department), at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be submitted to the Compliance Authority.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office. The mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida, 32256-7590. The phone number is 904/807-3300.
3. **Appendices:** The following appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms), Appendix B (General Conditions) and Appendix C (Common Conditions).
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. **Construction and Expiration:** The Department may extend the expiration date upon a satisfactory showing that an extension is justified. Such a request shall be submitted to the Department's Bureau of Air Regulation at least 60 days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1) and 62-212.400(12), F.A.C.]
6. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. **Modifications:** No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. This permit authorizes construction of the referenced facilities. [Chapters 62-210 and 62-212, F.A.C.]
8. **Title V Air Operation Permit:** This permit authorizes the proposed work and initial operation to determine compliance. A Title V Air Operation Permit is required for regular operation of the permitted emission units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213.420, F.A.C.]

## SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

### No. 4 Lime Kiln

The specific conditions of this subsection apply to the following emission unit after the authorized work is completed.

EU ID	Emission Unit Description
017	No. 4 Lime Kiln

#### CONSTRUCTION ACTIVITIES

1. Air Pollution Control Equipment: The permittee is authorized to install a dual orifice impingement tray and a chevron mist eliminator in the existing scrubber separator tank on the No. 4 Lime Kiln. This includes repair and maintenance and other associated work on the scrubber, as necessary. The permittee shall install and operate equipment to monitor the scrubber water flow rate provided to the wet impingement tray and a chevron mist eliminator system. [Application No. 1070005-061-AC]

#### EMISSIONS STANDARDS

2. Existing Standards: No new emissions standards are imposed by this permit. The No. 4 Lime Kiln remains subject to all applicable requirements in the current Title V air operation permit. [Rules 62-4.070(3) and 62-210.300 and Chapter 62-213, F.A.C.]
3. Scrubber Water Flow: At least once per day, the permittee shall record the scrubber water flow rate provided to the wet impingement tray and a chevron mist eliminator system. [Rule 62-4.070(3), F.A.C.]

#### COMPLIANCE TESTING REQUIREMENTS

4. Initial Compliance Tests: After completing the authorized work, the permittee shall conduct stack testing to determine compliance with the applicable PM emissions standards specified in the Title V air operation permit for the No. 4 Lime Kiln. Since the additional control equipment will remove additional particulate matter, the permittee may conduct the initial test during the next regularly scheduled annual compliance test for the No. 4 Lime Kiln. In addition to the test methods and procedures, the permittee shall follow all notification, monitoring and reporting requirements in the current Title V air operation permit. During each required PM emissions test run, the permittee shall record the scrubber water flow rate provided to the wet impingement tray and a chevron mist eliminator system. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]



## **SECTION 4. APPENDICES**

---

### **Contents**

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

---

#### CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

##### Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

##### New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

##### PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

##### Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

##### Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

#### GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

<b>CAA:</b> Clean Air Act	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CMS:</b> continuous monitoring system	<b>NSPS:</b> New Source Performance Standards
<b>CO:</b> carbon monoxide	<b>O&amp;M:</b> operation and maintenance
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O<sub>2</sub>:</b> oxygen
<b>COMS:</b> continuous opacity monitoring system	<b>Pb:</b> lead
<b>DARM:</b> Division of Air Resource Management	<b>PM:</b> particulate matter
<b>DEP:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>Department:</b> Department of Environmental Protection	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F.A.C.:</b> Florida Administrative Code	<b>PSD:</b> prevention of significant deterioration
<b>F.A.W.:</b> Florida Administrative Weekly	<b>psi:</b> pounds per square inch
<b>F.D.:</b> forced draft	<b>PTE:</b> potential to emit
<b>F.S.:</b> Florida Statutes	<b>RACT:</b> reasonably available control technology
<b>FGD:</b> flue gas desulfurization	<b>RATA:</b> relative accuracy test audit
<b>FGR:</b> flue gas recirculation	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>Fl:</b> fluoride	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	
<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants	

## SECTION 4. APPENDIX B

### General Conditions

The permittee shall comply with the following general conditions from Rule, 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

## SECTION 4. APPENDIX B

### General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (not applicable);
  - b. Determination of Prevention of Significant Deterioration (not applicable); and
  - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## SECTION 4. APPENDIX C

### Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

#### EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

#### RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting:**
  - a. ***Applicability.*** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

## SECTION 4. APPENDIX C

### Common Conditions

with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) *Continuous Emissions Monitoring System (CEMS).*
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) *Mass Balance Calculations.*
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

## SECTION 4. APPENDIX C

### Common Conditions

- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
  - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
  - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the



---

**SECTION 4. APPENDIX C**

**Common Conditions**

---

department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

*c. Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
  - a. All Title V sources.
  - b. All synthetic non-Title V sources.
  - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
  - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Friday, August 21, 2009 12:44 PM  
**To:** gary.frost@gapac.com  
**Cc:** michael.curtis@gapac.com; mjugaila@gapac.com; wjgaller@gapac.com; ron.reynolds@gapac.com; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** GA-Pacific Consumer Operations LLC, PALATKA PULP and PAPER MILL; 1070005-061-AC  
**Attachments:** 1070005-061-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.061.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

**Facility Name:** PALATKA PULP and PAPER MILL

**Project Number:** 1070005-061-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION/ NO 4 LIME KILN SCRUBBER UPGRD

**Facility County:** PUTNAM

**Processor:** Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Tracking:

## Livingston, Sylvia

---

**From:** Frost, Gary (Florida) [GARY.FROST@GAPAC.com]  
**Sent:** Saturday, August 22, 2009 6:30 AM  
**To:** Livingston, Sylvia  
**Cc:** Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.; Reynolds, Ron E.; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** RE: GA-Pacific Consumer Operations LLC, PALATKA PULP and PAPER MILL; 1070005-061-AC

Sylvia

We are able to access the documents – Thank you.

Gary Frost

Vice President, Palatka Operations

Office - 386-329-0063

Cell - 920-445-1031

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, August 21, 2009 12:45 PM  
**To:** Frost, Gary (Florida)  
**Cc:** Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.; Reynolds, Ron E.; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** GA-Pacific Consumer Operations LLC, PALATKA PULP and PAPER MILL; 1070005-061-AC

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.061.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-061-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION/ NO 4 LIME KILN SCRUBBER UPGRD  
**Facility County:** PUTNAM  
**Processor:** Bruce Mitchell

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

## Livingston, Sylvia

---

**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Monday, August 24, 2009 9:10 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: GA-Pacific Consumer Operations LLC, PALATKA PULP and PAPER MILL; 1070005-061-AC

Sylvia,  
Documents received.

Thank you,

Ron Reynolds  
Environmental Engineer - Air Quality  
Georgia Pacific - Palatka Mill  
Office 386-329-0967  
Cell 386-916-3133

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

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, August 21, 2009 12:45 PM  
**To:** Frost, Gary (Florida)  
**Cc:** Curtis, Michael; Aguilar, Mark J.; Galler, Wayne J.; Reynolds, Ron E.; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** GA-Pacific Consumer Operations LLC, PALATKA PULP and PAPER MILL; 1070005-061-AC

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.061.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-061-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION/ NO 4 LIME KILN SCRUBBER UPGRD  
**Facility County:** PUTNAM  
**Processor:** Bruce Mitchell