

Florida Department of Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *JK*
From: Bruce Mitchell, New Source Review Section *BM*
Date: July 6, 2009
Subject: Draft 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

Attached for your review is a draft minor air construction permit package for the Palatka Mill, which is located in Putnam County, North of CR 216 and West of US 17, in the city of Palatka, Florida. Briefly, the draft 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 PM 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. Actual emissions of particulate matter are expected to decrease. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. Day 90 of the permitting time clock is August 26, 2009. The mill will undergo a shutdown in September 2009, which is when the modifications to the scrubber are to take place. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/rbm

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

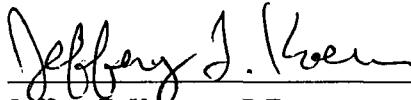
Project No. 1070005-061-AC
Georgia-Pacific Palatka Mill
No. 4 Lime Kiln
Scrubber Modification
Putnam County, Florida

PROJECT DESCRIPTION

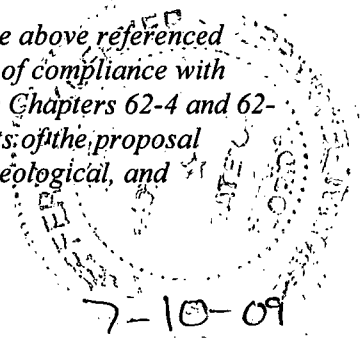
The Georgia-Pacific Consumer Operations LLC operates an existing pulp and paper mill in Palatka, Florida. Currently, particulate matter (PM) emissions from the existing No. 4 Lime Kiln are controlled by a cyclone followed in series by a wet venturi scrubber. To improve PM removal efficiency of the scrubber system, the applicant proposes to install a dual orifice impingement tray and a chevron mist eliminator in the separator tank of the scrubber. The additional equipment will trap additional small particles in larger water droplets that will be removed from the exhaust.

Because additional PM will be removed by the new air pollution control equipment, actual emissions are expected to decrease as a result of the project; therefore, the project is subject only the general preconstruction review requirements in Rule 62-212.300, F.A.C. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number 49441



7-10-09

(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

July 17, 2009

Sent by Electronic Mail – Received Receipt Requested

Mr. Gary Frost, V.P. Operations
Georgia-Pacific Consumer Operations LLC
Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

Re: Project No. 1070005-061-AC
Palatka Mill
Modification of the Scrubber System for Existing No. 4 Lime Kiln

Dear Mr. Frost:

On May 28, 2009, an application was submitted requesting authorization to install a dual orifice impingement tray and a chevron mist eliminator to the scrubber separator tank for the existing No. 4 Lime Kiln. The purpose is to improve the particulate matter removal by the scrubber. The existing facility is a pulp and paper mill located in Putnam County, north of CR 216 and west of US 17 in Palatka, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit.

The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

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

Authorized Representative:

Mr. Gary Frost, Vice President Operations

Putnam County, Florida

Facility Location: Georgia-Pacific Consumer Operations LLC operates the existing Palatka Mill, which is located in Putnam County, north of CR 216 and west of US 17 in Palatka, Florida.

Project: On May 28, 2009, the applicant submitted an application to modify the scrubber system on the No. 4 Lime Kiln by adding a dual orifice impingement tray and a chevron mist eliminator. The purpose is to improve particulate matter removal by the scrubber. No emissions increases are expected as a result of this project. Details of the project are provided in the attached Technical Evaluation and Preliminary Determination.

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, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 information set forth below and must be filed with (received by) the Department's 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 filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. 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 Written Notice of Intent to Issue Air Permit. 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft 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 7/17/09 to the persons listed below.

- Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC (michael.curtis@gapac.com)
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC (ron.reynolds@gapac.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Vickie Gibson, BAR Reading File (Victoria.Gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

7/17/09
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit, No. 4 Lime Kiln Scrubber Modifications
Project No. 1070005-061-AC
Georgia-Pacific Consumer Operations LLC – Palatka Mill
Putnam County, Florida

Applicant: The applicant for this project is the Georgia-Pacific Consumer Operations LLC. The applicant's authorized representative and mailing address is: Mr. Gary Frost, Vice President Operations, P.O. Box 919, Palatka, Florida 32178-0919.

Facility Location: Georgia-Pacific Consumer Operations LLC operates an existing pulp and paper mill (Palatka Mill), which is located in Putnam County, north of CR 216 and west of US 17 in Palatka, Florida.

Project: On May 28, 2009, the applicant submitted an application to modify the scrubber system on the No. 4 Lime Kiln by adding a dual orifice impingement tray and a chevron mist eliminator. The purpose is to improve particulate matter removal by the scrubber. No emissions increases are expected as a result of this project.

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, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, 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 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:

www.dep.state.fl.us/air/eproducts/apds/default.asp.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 information set forth below and must be filed with (received by) the Department's Agency Clerk in the

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. 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 rights will be affected by the agency determination; (c) A statement of when and how the 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 Public Notice of Intent to Issue Air Permit. 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 for this proceeding.

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

PROJECT

Draft Permit No. 1070005-061-AC
Georgia-Pacific Palatka Mill
Facility ID No. 1070005
Modification of the Existing No. 4 Lime Kiln Scrubber System

COUNTY

Putnam County, Florida

APPLICANT

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation – New Source review Section
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

July 17, 2009

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility and Location

The Georgia-Pacific Consumer Operations LLC operates an existing pulp and paper mill (SIC Nos. 2611 and 2621) in Palatka located North of CR 216 and West of US 17, Putnam County, Florida. The UTM coordinates of this facility are: Zone 17; 434.0 km East; and, 3283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for each air pollutant subject to a National Ambient Air Quality Standard (NAAQS).

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_x), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfuric acid mist (SAM), sulfur dioxide (SO₂), total reduced sulfur (TRS), and volatile organic compounds (VOC). On the following page, Figure 10.2-1 shows the typical process flow for a Kraft sulfate pulping and recovery process.

Facility Regulatory Categories

- 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.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- The facility is a major stationary source subject to the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

On May 28, 2009, the applicant submitted an application for an air construction permit pursuant to Rule 62-210.300(1), F.A.C. for the construction of additional air pollution control equipment. The preliminary schedule is to complete all of the work during the September 2009 outage. Currently, 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, the applicant requests an air construction permit to install a dual orifice impingement tray and a chevron mist eliminator in the separator tank of the scrubber. The additional equipment will trap small particles in larger water droplets that will be removed from the exhaust.

The gas stream enters the scrubber and rises through a water spray zone where it is cooled and humidified. The dual orifice impingement tray will be installed below the chevron mist eliminator and will treat the exhaust gas first. The wet impingement tray causes small particles to collide with water droplets resulting in particle capture. Performance curves for wet impingement scrubbers show approximately 90% collection efficiency for particles 1 micron in size. The larger water droplets may then be removed by gravitational or inertial separation.

Droplets in the exhaust from the dual orifice impingement tray will enter the chevron mist eliminators, which consist of a series of baffles that change direction of the gas path. Because of the momentum, the liquid droplets cannot follow the gas streamline through the baffles and the droplets collide with the chevron blades. The droplets coalesce and the liquid which contains the small particles is drained, collected and removed from the system.

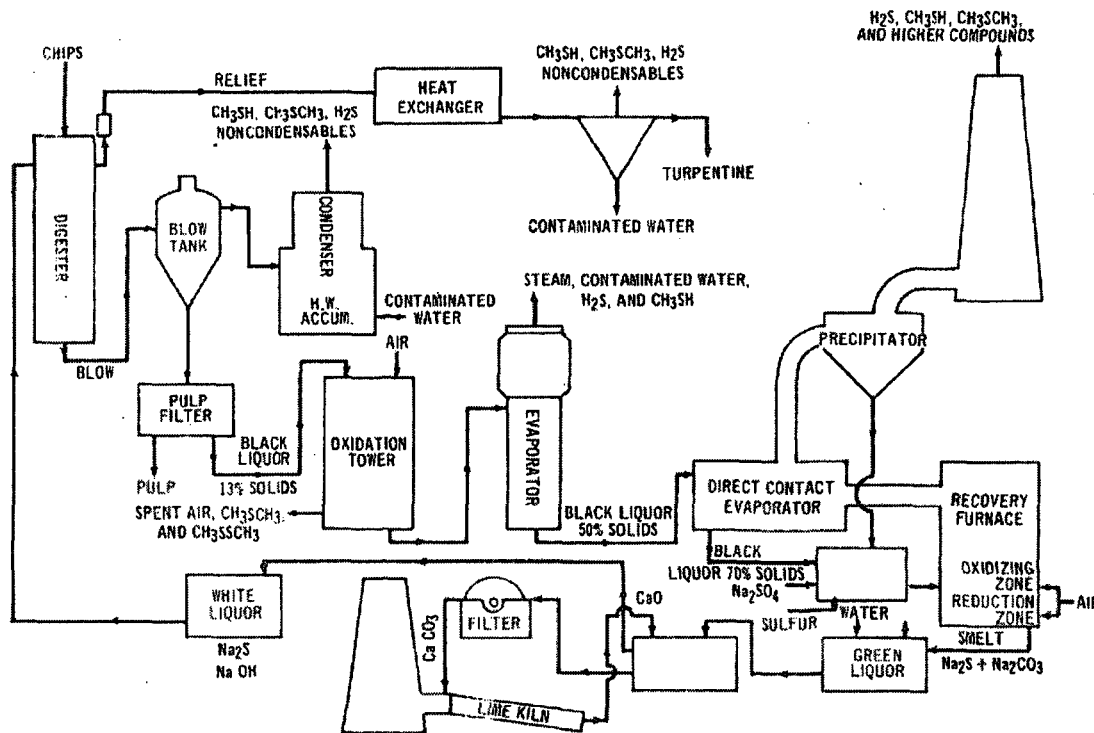


Figure 10.2-1. Typical kraft sulfate pulping and recovery process.

Reference: Section 10.2, Chemical Wood Pulping, AP 42, Fifth Edition, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, September 1990.

2. PSD APPLICABILITY

General PSD Applicability

The Department regulates major stationary sources in accordance with Florida's PSD program pursuant to Rule 62-212.400, F.A.C. A PSD preconstruction review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards or areas designated as "unclassifiable" for a given pollutant. A facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories; or, 5 tons per year or more of lead.

New projects at existing PSD-major stationary sources are reviewed for PSD applicability based on net emissions increases from the project. Each PSD pollutant is evaluated for applicability based on emissions thresholds known as the Significant Emission Rates as defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant". In addition, applicants may choose to conduct a "PSD netting analysis" that includes all emissions increases as well as all emissions decreases for a 5-year period contemporaneous with the project to determine whether or not a PSD significant emissions increase will occur. Although a facility may be "major" for only one PSD pollutant, the project may be "significant" for several PSD pollutants. For each significant PSD pollutant, the applicant must employ the Best Available Control Technology (BACT) to minimize emissions and conduct an air quality analysis that demonstrates emissions from the project will not cause or contribute to adverse ambient impacts.

PSD Applicability for the Project

The project is located in Putnam County, which is in an area that is currently in attainment with the state and federal Ambient Air Quality Standards or otherwise designated as unclassifiable. The existing facility is a PSD major stationary source. Because the purpose of the project is to remove additional fine particles after the existing wet venturi scrubber system, the applicant projects no emissions increases. Actual PM emissions are expected to decrease; therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT REVIEW

Current Requirements

The No. 4 Lime Kiln is currently subject to the following industry-specific state regulations:

- Rule 62-296.404, F.A.C. for Kraft pulp mills; and
- Rule 62-212.400, F.A.C. for PSD preconstruction review (Permit no. PSD-FL-380).

The No. 4 Lime Kiln is also currently subject to the following federal regulations:

- 40 CFR 60, NSPS Subpart A for the general provisions;
- 40 CFR 60, NSPS BB for Kraft pulp mills;
- 40 CFR 63, NESHAP Subpart A for the general provisions;
- 40 CFR 63, NESHAP Subpart S for Kraft pulp mills;
- 40 CFR 63, NESHAP Subpart MM for Kraft pulp mills; and
- 40 CFR 63, NESHAP Subpart RR for individual drain systems.

Permit No. PSD-FL-380 (Project 1070005-038-AC) establishes the most stringent PM emissions standard for the No. 4 Lime Kiln at 0.55 lb per ton of lime mud solids as determined by EPA Method 5 after control by the wet venturi scrubber. The permit establishes continuous monitoring of the venturi pressure drop and scrubber water flow rate consistent with the monitoring requirements of NESHAP Subpart MM in 40 CFR 63.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The existing Title V permit captures all of the above applicable requirements. This project will not change any of the applicable provisions for the No. 4 Lime Kiln.

Conclusion

The Department will issue a draft air construction permit authorizing installation of the dual orifice impingement tray and chevron mist eliminator in the separator tank of the scrubber on the No. 4 Lime Kiln. The draft permit will require monitoring of the additional scrubber water flow provided to the new equipment. Following construction of the new control systems, the draft permit will require stack testing to determine PM emissions; however, since the additional controls are expected to further reduce PM emissions, the permit will allow the test to be conducted during the next regularly scheduled annual test in accordance with the Title V air operation permit. The draft permit will supplement all previous permits issued for the affected emissions unit.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit documents. Jeff Koerner, P.E. is the Air Permitting Supervisor responsible for reviewing and editing the draft permit package. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

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.

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

Effective Date

SECTION 1. GENERAL INFORMATION (DRAFT)

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_x), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfuric acid mist (SAM), sulfur dioxide (SO₂), 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 (DRAFT)

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 (DRAFT)

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 (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

SECTION 4. APPENDIX A (DRAFT)
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 (DRAFT)
Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F.A.C.: Florida Administrative Code	PSD: prevention of significant deterioration
F.A.W.: Florida Administrative Weekly	psi: pounds per square inch
F.D.: forced draft	PTE: potential to emit
F.S.: Florida Statutes	RACT: reasonably available control technology
FGD: flue gas desulfurization	RATA: relative accuracy test audit
FGR: flue gas recirculation	RBLC: EPA's RACT/BACT/LAER Clearinghouse
Fl: fluoride	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	
NESHAP: National Emissions Standards for Hazardous Air Pollutants	

SECTION 4. APPENDIX B (DRAFT)

General Conditions

The permittee shall comply with the following general conditions from Rule 624.160, 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 (DRAFT)

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 that 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 (DRAFT)

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 (DRAFT)

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 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 (DRAFT)

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 sitespecific 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 (DRAFT)

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, Sylvania

From: Livingston, Sylvania
Sent: Friday, July 17, 2009 12:40 PM
To: 'gary.frost@gapac.com'
Cc: 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'ron.reynolds@gapac.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC
Attachments: 1070005-061-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** 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 permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.D_pdf.zip

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-061-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
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>.

Permit project documents 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

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

Livingston, Sylvia

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Friday, July 17, 2009 1:07 PM
To: Livingston, Sylvia
Subject: RE: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Sylvia,

Verifying receipt.

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, July 17, 2009 12:40 PM
To: Frost, Gary (Florida)
Cc: Curtis, Michael; Aguilar, Mark J.; Reynolds, Ron E.; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** 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 permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.D_pdf.zip

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC
Facility Name: PALATKA PULP and PAPER MILL
Project Number: 1070005-061-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: PUTNAM
Processor: Bruce Mitchell

Livingston, Sylvia

From: Kelley, Tracey S. [TRACEY.KELLEY@GAPAC.com]
Sent: Tuesday, July 21, 2009 10:03 AM
To: Livingston, Sylvia
Subject: RE: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Thank you so much!

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

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, July 21, 2009 9:57 AM
To: Kelley, Tracey S.
Cc: Reynolds, Ron E.
Subject: RE: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Ms. Kelley,

I've attached the Public Notice word version to this e-mail. Please let me know if you need any further assistance.

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

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Kelley, Tracey S. [mailto:TRACEY.KELLEY@GAPAC.com]
Sent: Tuesday, July 21, 2009 9:52 AM
To: Livingston, Sylvia
Cc: Reynolds, Ron E.
Subject: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Ms. Livingston,

Would it be possible to get a copy of the Public Notice that we need to publish in Word format to send to the newspaper office?

Thanks for your help.

Tracey Kelley
Administrative Assistant
Environmental Department
Georgia-Pacific Consumer Operations, LLC
(386) 329-0096

Livingston, Sylvia

From: Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]
Sent: Wednesday, July 22, 2009 5:44 PM
To: Livingston, Sylvia; Frost, Gary (Florida)
Cc: 'michael.curtis@gapac.com'
Subject: Re: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

We have received and can open the document

From: Livingston, Sylvia
To: Frost, Gary (Florida)
Cc: michael.curtis@gapac.com <'michael.curtis@gapac.com'>
Sent: Wed Jul 22 16:03:30 2009
Subject: FW: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Dear Sir/ Madam:

We have not received confirmation that you were able to access the documents attached to this July 17th e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

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

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Livingston, Sylvia
Sent: Friday, July 17, 2009 12:40 PM
To: 'gary.frost@gapac.com'
Cc: 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'ron.reynolds@gapac.com'; Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** 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 permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.061.AC.D_pdf.zip

Owner/Company Name: GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

Facility Name: PALATKA PULP and PAPER MILL

Project Number: 1070005-061-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

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> .

Permit project documents 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

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

Livingston, Sylvia

From: Frost, Gary (Florida) [GARY.FROST@GAPAC.com]
Sent: Wednesday, July 22, 2009 5:04 PM
To: Livingston, Sylvia
Subject: Out of Office: Georgia-Pacific Consumer Operations LLC - PALATKA PULP and PAPER MILL; 1070005-061-AC

I will be out of the office until Monday afternoon, December 1. Please contact Robert Mumford if you need immediate assistance. Thank you If my immediate attention is required please use the following cell phone number 920-445-1031