



Florida Department of  
Environmental Protection

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**Memorandum**

To: Mike Halpin, Director  
To: Trina Vielhauer, Deputy Director  
Through: Jeff Koerner, New Source Review Section   
From: Bobby Bull, New Source Review Section   
Date: April 4, 2011  
Subject: Final Minor Source Air Construction Permit  
Project No. 1070005-066-AC  
Georgia-Pacific, Palatka Mill  
Natural Gas Burners at No. 4 Combination Boiler

The final permit for this project is attached for your approval and signature, which authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade of the existing mechanical dust collection system, replacement of the existing steam turbine-driven induced draft fan-drive with an electric fan motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section. The work will be performed in Putnam County at 215 County Road 216 in Palatka, Florida. The project results in a minor source air construction permit and is not subject to PSD preconstruction review.

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

TLV/jfk/rlb

## FINAL DETERMINATION

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### PERMITTEE

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

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Bureau of Air Regulation  
New Source Review Section  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399

### PROJECT

Air Permit No. 1070005-066-AC  
Minor Source Air Construction Permit  
Palatka Mill

This is the final air construction permit, which authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade of the existing mechanical dust collection system, replacement of the existing steam turbine-driven induced draft fan-drive with an electric fan motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section.

### NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on March 10, 2011. The applicant published the Public Notice in the Palatka Daily News on March 12, 2011. The Department received the proof of publication on March 22, 2011. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

### COMMENTS

#### Applicant

On March 23, 2011, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. *Comment:* Section 1, Facility Description: The emissions unit list does not include all EU's listed on our current Title V permit. Those missing are 039-Bark Hog, 047-BSW lines 3, 5, 6, &7, 048-O2 DeLig system, and 050-Converting.

*Response:* These emission units have been added to the emissions unit list in Section 1.

2. *Comment:* Section 1, General Information – Proposed project description: The descriptions say that the existing steam driven induced draft fan-drive is being replaced with an electric motor. Actually, the fan will be replaced also (with no capacity increase), so we suggest it be revised as: "replace the existing steam-driven induced draft fan-drive with an electric fan motor and fan".

*Response:* The language in the General Information is revised to reflect the requested language.

3. *Comment:* Section 3, A – emissions unit description says that the unit continuously monitors for TRS emissions. This is incorrect; there is no TRS CEMS on the #4 Combination Boiler. Also, the last statement in the description which begins with "This project includes..." should be revised to include the replacement of the ID fan, and the partial replacement (28 tube sections) of the superheater.

*Response:* Reference to continuous TRS emissions monitoring has been removed from the description. Language adding the fan replacement and tube section replacement has been added to the description.

## FINAL DETERMINATION

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4. *Comment:* Section 3, Permit Condition A.2.c should be revised to read “Replace the existing steam turbine-driven on the Induced Draft (ID) fan for the No. 4 Combination Boiler with an electric motor ID fan.”

*Response:* The language in Condition A.2.c is revised to reflect the requested language.

5. *Comment:* Section 3, Permit Condition A.4 lists an incorrect maximum heat input rate for bark/wood firing. The rate is listed as 564.0 MMBtu/hr, but should be 512.7 MMBtu/hr.

*Response:* The language in Condition A.4 is revised to reflect the requested language.

6. *Comment:* Technical Evaluation and Preliminary Determination (TEPD), Section 1, Paragraph 2 of the Project Description (top of page 9): The first sentence says that the replacement of the 28 tube sections of the superheater section was originally permitted in permit No. 1070005-045-AC. Actually, the modification to the dust collection system was part of that permit along with the gas conversion, and the superheater section modification should be referenced in the second sentence along with the ID fan replacement.

*Response:* This final determination will clarify the dust collection system was also part of the 1070005-045-AC project along with the gas conversion and superheater section modification.

7. *Comment:* TEPD, Table 1: The ‘could have accommodated’ emissions for CO and VOC are added to the baseline actual emissions. We suggest including it as a separate column to clearly identify the portions that are baseline emissions and could have accommodated emissions.

*Response:* The Department understands the permittee’s concern for distinguishing the emissions. The determination has been revised to show baseline emissions and ‘could have accommodated’ emissions.

8. *Comment:* TEPD, In Paragraph 4 of Section 3. Department Review of the Technical Evaluation, it is stated, “The permittee considered the restored bark rate as ‘could have accommodated’ rate in its review of potential emissions.” However, we excluded the restored bark rate from ‘could have accommodated’ because it is clearly related to the project. We suggest updating the sentence to read, “The permittee excluded the restored bark rate when determining the ‘could have accommodated’ rate in its review of projected actual emissions, as it is related to the project.”

*Response:* The language in the TEPD was revised as requested by the permittee.

9. *Comment:* TEPD, Section 3, Paragraph 4: The first two sentences should be revised similarly to the second bullet above to reflect that the ID fan will also be replaced, not just the drive type.

*Response:* The determination will reflect the replacement of the existing fan with the ID fan.

10. *Comment:* TEPD, Section 3, Paragraph 5 states that the replacement of the 28 continuous tube sections of the superheater was previously permitted under permit no. 1070005-038-AC, PSD-FL-380. Review of this permit does not support this. While the replacement of tubes in the #4 Recovery Boiler (EU ID 018) was covered, there was no mention of tube replacement for the #4 Combination Boiler. However, this correction has no effect on the current permitting action which will authorize the superheater tube replacement.

*Response:* The superheater section modification was originally permitted under Air Construction Permit 1070005-045-AC as indicated in Comment 6.

The Department will update the TEPD and replace it in the draft documents available on the DARM website.

## CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## PERMITTEE

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

Air Permit No. 1070005-066-AC  
Permit Expires: March 1, 2013  
Minor Air Construction Permit

Authorized Representative:  
Gary L. Frost, Vice President Operations

Palatka Mill  
Natural Gas Burners at No. 4  
Combination Boiler

## PROJECT

This is the final air construction permit, which authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade of the existing mechanical dust collection system, replacement of the existing steam turbine-driven induced draft fan-drive with an electric motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section. The proposed work will be conducted at the existing Palatka Mill, which is a Kraft pulp and paper mill categorized under Standard Industrial Classification No. 2611. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates are Zone 17, 434.00 km East and 3,283.4 km North.

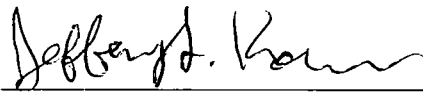
This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

## STATEMENT OF BASIS

This air pollution 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 permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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

  
\_\_\_\_\_  
Mike Halpin, Director  
Division of Air Resource Management

4-7-11  
\_\_\_\_\_  
(Date)

For //

**FINAL PERMIT**

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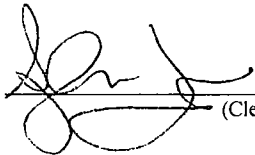
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) 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 4/7/11 to the persons listed below.

- Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)
- Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)
- Mr. David A. Buff, Golder Associates (dbuff@golder.com)
- Mr. Christopher Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (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)

4/7/11  
\_\_\_\_\_  
(Date)

**SECTION 1. GENERAL INFORMATION**

**FACILITY DESCRIPTION**

The existing facility consists of the following emissions units.

Facility ID No. 1070005	
ID No.	Emission Unit Description
015	No. 5 Power Boiler
016	No. 4 Combination Boiler
017	No. 4 Lime Kiln
018	No. 4 Recovery Boiler
019	No. 4 Smelt Dissolving Tanks (2)
031	Tall Oil Plant
035	ClO <sub>2</sub> Plant and Methanol Storage Tank
036	ECF No. 3 Bleach Plant
039	Bark Hog
044	No. 7 Package Boiler
037	Thermal Oxidizer
045	Wide-web Flexographic Printers
046	Condensate Stripper System
047	Brown Stock Washing System- Lines 3,5,6,&7
048	O <sub>2</sub> DeLig system
050	Converting Department

**PROPOSED PROJECT**

The applicant proposes to replace the existing fuel oil burners with natural gas burners, upgrade the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric fan motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section at the existing No. 4 combination boiler (EU 016).

This project will modify the following emissions unit.

Facility ID No. 1070005	
ID No.	Emission Unit Description
016	No. 4 Combination Boiler

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- 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(PSD), F.A.C.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District (as applicable) at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District at: 7825 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a 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, 62-296 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.
5. 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.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
  - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
  - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.  
[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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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, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
  - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
    - 1) The name, address and telephone number of the owner or operator of the major stationary source;
    - 2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
    - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
    - 4) Any other information that the owner or operator wishes to include in the report.
  - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the permit requires the annual reporting of actual  $NO_x$ ,  $SO_2$ ,  $CO$ ,  $VOC$ , and  $PM$  emissions for the following unit: *Emissions Unit 016 - No. 4 Combination Boiler*.

[Application 1070005-066-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]



## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. No. 4 Combination Boiler (EU-016)

This section of the permit addresses the following emissions unit.

#### No. 4 Combination Boiler (EU-016)

The boiler is a spreader-stoker traveling grate furnace with a pneumatic fuel feed distribution system. It was manufactured by Babcock & Wilcox and constructed in 1965. The primary fuel is bark/wood, which is supplemented with fuel oil. The maximum steam production rate is 475,000 lb/hour based on steam conditions of 900 F at 1275 psi. Particulate matter emissions are controlled by mechanical dust collectors as pre-cleaners to the ESP. The boiler also serves as a backup control device for other permitted operations. This project includes replacement of supplemental fuel oil with natural gas, upgrading the existing mechanical dust collection system, replace the existing steam turbine-driven induced draft fan-drive with an electric fan motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section.

#### EXISTING APPLICABLE REGULATIONS

1. Existing Permits and Regulations: This permit supplements other previously issued air permits for the No. 4 Combination Boiler, which include the following applicable state and federal regulations.
  - a. Pursuant to Rule 62-296.404(3)(f)1, F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for a combustion device incinerating TRS emissions at a Kraft pulp mill.
  - b. Pursuant to Rule 62-296.410(1)(b), F.A.C., the No. 4 Combination Boiler is subject to the applicable requirements for an existing carbonaceous fuel fired boiler.
  - c. Pursuant to 40 CFR 63.443(d)(4)(ii), the No. 4 Combination Boiler is subject to the applicable requirements for controlling HAP emissions from the pulping system at Kraft processes. [NESHAP Subpart S in 40 CFR 63]

*{Permitting Note: The applicable requirements are specified in the latest Title V air operation permit (No. 1070005-048-AV). This project does not impose any new applicable requirements from these existing regulations.}* [Rules 62-296.404 and 62-296.410, F.A.C.; and 40 CFR 63.443]

#### MODIFICATIONS AND CAPACITIES

2. Modifications: The permittee shall make the following modifications and other related work to the No. 4 Combination Boiler:
  - a. Replace the three existing No. 6 residual oil burners with natural gas burners. Natural gas shall replace No. 6 residual fuel oil as the supplemental fuel supply for No. 4 Combination Boiler. Fuel oil will no longer be permitted after the burner replacement is complete.
  - b. Upgrade the existing mechanical dust collection system. The No. 3 tertiary collector shall be upgraded to become the primary dust collector prior to the electrostatic precipitator.
  - c. Replace the existing steam turbine-driven on the induced draft (ID) fan for the No. 4 combination boiler with an electric motor ID fan.
  - d. Partially replace 28 continuous tube sections in the boiler's superheater section.
3. Authorized Fuels: After completing the modifications, the No. 4 Combination Boiler is authorized to fire bark/wood and natural gas. *{Permitting Note: The No. 4 Combination Boiler is permitted to serve as a control device to combust non-condensable gases, stripper off-gases and dilute non-condensable gases.}* [Rules 62-210.200(PTE) and 62-212.400(PSD), F.A.C.; Permit Nos. 1070005-017-AC, 1070005-024-AC, and 1070005-066-AC]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**A. No. 4 Combination Boiler (EU-016)**

4. Permitted Capacity: After completing the modifications, the No. 4 Combination Boiler is authorized to operate at the following maximum heat input rates.

<b>Fuel Source</b>	<b>Maximum Heat Input Rate</b>
Bark/Wood (alone or combined with other fuels)	512.7 MMBtu/hr, 24-hr average <sup>a</sup>
Natural Gas	427.0 MMBtu/hr, 24-hr average <sup>b</sup>

<sup>a</sup> Based on 57.0 tons per hour of bark/wood with an average heating value of 4500 Btu/lb on an as-fired basis (wet).

<sup>b</sup> Based on 427,000 cubic feet (cf) per hour of natural gas with an average heating value of 1000 Btu/cf.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit AC54-163040, Permit Nos. 1070005-17-AC, PCP Exclusion dated March 14, 2002, 1070005-024-AC, 1070005-28-AC and 1070005-038-AC; and Application No. 1070005-066-AC]

**EMISSIONS STANDARDS**

5. Existing Standards: The No. 4 Combination Boiler remains subject to all applicable requirements in the current Title V air operation permit. No new emissions standards are imposed by this permit. [Rules 62-4.070(3) and 62-210.300 and Chapter 62-213, F.A.C.]

**RECORDKEEPING**

6. Steam Records: The permittee shall continuously monitor and record the following steam parameters: steam production rate (lb/hour), steam pressure (psig), steam temperature (° F) and feedwater temperature (° F). [62-4.070(3), F.A.C.]

## SECTION 4. APPENDICES

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### 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

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#### 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

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

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>PM<sub>2.5</sub>:</b> particulate matter with a mean aerodynamic diameter of 2.5 microns or less
<b>dscf:</b> dry standard cubic feet	<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:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<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 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

### 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 (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

### 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 624.130, 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 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.]
4. **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.]
5. **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.]
6. **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.]
7. **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.]
8. **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

9. **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.]
10. **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 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,



## SECTION 4. APPENDIX C

### Common Conditions

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
  - 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

## SECTION 4. APPENDIX C

### Common Conditions

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 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.

## SECTION 4. APPENDIX C

### Common Conditions

- 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. 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

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**From:** Livingston, Sylvia  
**Sent:** Thursday, April 07, 2011 3:37 PM  
**To:** 'gary.frost@gapac.com'  
**Cc:** 'ron.reynolds@gapac.com'; 'dbuff@golder.com'; Kirts, Christopher; 'Forney.kathleen@epa.gov'; 'Abrams.heather@epa.gov'; Gibson, Victoria; Bull, Robert; Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Operations, LLC - Palatka Pulp & Paper Mill; 1070005-066-AC  
**Attachments:** 1070005-066-AC\_Signatures.pdf

Tracking:	Recipient	Delivery	Read
	'gary.frost@gapac.com'		
	'ron.reynolds@gapac.com'		
	'dbuff@golder.com'		
	Kirts, Christopher	Delivered: 4/7/2011 3:37 PM	
	'Forney.kathleen@epa.gov'		
	'Abrams.heather@epa.gov'		
	Gibson, Victoria	Delivered: 4/7/2011 3:37 PM	Read: 4/7/2011 3:54 PM
	Bull, Robert	Delivered: 4/7/2011 3:37 PM	Read: 4/7/2011 3:41 PM
	Walker, Elizabeth (AIR)	Delivered: 4/7/2011 3:37 PM	

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/1070005.066.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.066.AC.F_pdf.zip)

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

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

**Project Number:** 1070005-066-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Robert Bull

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/emission/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

**Livingston, Sylvia**

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**From:** Frost, Gary (Florida) [GARY.FROST@GAPAC.com]  
**Sent:** Friday, April 08, 2011 6:43 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: Georgia-Pacific Consumer Operations, LLC - Palatka Pulp & Paper Mill; 1070005-066-AC

Thank you

Gary Frost

Vice President, Palatka Operations

Office - 386-329-0063

Cell - 920-445-1031

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, April 07, 2011 3:37 PM  
**To:** Frost, Gary (Florida)  
**Cc:** Reynolds, Ron E.; [dbuff@golder.com](mailto:dbuff@golder.com); Kirts, Christopher; [Forney.kathleen@epa.gov](mailto:Forney.kathleen@epa.gov); [Abrams.heather@epa.gov](mailto:Abrams.heather@epa.gov); Gibson, Victoria; Bull, Robert; Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Operations, LLC - Palatka Pulp & Paper Mill; 1070005-066-AC

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.066.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.066.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-066-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** PUTNAM  
**Processor:** Robert Bull

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## Livingston, Sylvania

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**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Thursday, April 07, 2011 3:52 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: Georgia-Pacific Consumer Operations, LLC - Palatka Pulp & Paper Mill; 1070005-066-AC

Confirming access to documents. Thank you!

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

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, April 07, 2011 3:37 PM  
**To:** Frost, Gary (Florida)  
**Cc:** Reynolds, Ron E.; dbuff@golder.com; Kirts, Christopher; Forney.kathleen@epa.gov; Abrams.heather@epa.gov; Gibson, Victoria; Bull, Robert; Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Operations, LLC - Palatka Pulp & Paper Mill; 1070005-066-AC

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.066.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.066.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-066-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** PUTNAM

**Processor:** Robert Bull

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