

APPLICATION
FOR REVISION OF TITLE V PERMIT
TALL OIL PLANT
GEORGIA-PACIFIC CORPORATION
PALATKA MILL

Prepared for::

Georgia-Pacific Corporation
North of CR 216; West of US 17
Palatka, Florida 32177

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

July 2001
0037601Y/F1

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STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Georgia-Pacific Corporation	
2. Site Name: Palatka Mill	
3. Facility Identification Number: 1070005 [] Unknown	
4. Facility Location: Street Address or Other Locator: North of CR 216; West of US 17 City: Palatka County: Putnam Zip Code: 32177	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Myra Carpenter, Superintendent of Environmental Affairs	
2. Application Contact Mailing Address: Organization/Firm: Georgia-Pacific Corporation Street Address: P.O. Box 919 City: Palatka State: FL Zip Code: 32178-0919	
3. Application Contact Telephone Numbers: Telephone: (386) 325-2001 Fax: (386) 328-0014	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: 1070005-009-AC

Operation permit number to be revised: 1070005-002-AV

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Theodore D. Kennedy, Vice President, G-P Palatka Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Georgia-Pacific Corporation Street Address: P.O. Box 919 City: Palatka State: FL Zip Code: 32178-0919
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (386) 325-2001 Fax: (386) 328-0014
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature <u>Theodore D Kennedy</u> Date <u>7/18/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

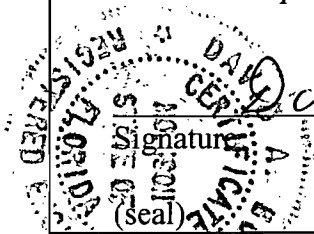
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



David A. Beff

Signature

7/11/01

Date

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

2. Projected or Actual Date of Commencement of Construction

3. Projected Date of Completion of Construction:

Application Comment

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
PM	A				Particulate Matter – Total
PM ₁₀	A				Particulate Matter – PM ₁₀
SO ₂	A				Sulfur Dioxide
NO _x	A				Nitrogen Oxides
CO	A				Carbon Monoxide
VOC	A				Volatile Organic Compounds
SAM	A				Sulfuric Acid Mist
TRS	A				Total Reduced Sulfur
HAPs	A				Total Hazardous Air Pollutants
H001	A				Acetaldehyde
H021	B				Beryllium Compounds
H043	A				Chloroform
H095	A				Formaldehyde
H106	A				Hydrochloric Acid
H115	A				Methanol

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input checked="" type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT GP-FI-A

FACILITY REGULATIONS

Title V Core List

Effective:03/25/97

[**Note:** The Title V Core List is intended to simplify the completion of the "List of Applicable Regulations" that apply facility-wide (see Subsection II.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.

Requirements that apply to emissions units must be identified in Subsection III.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form.

Applicants must identify all "applicable requirements" in order to claim the "permit shield" described at Rule 62-213.460, F.A.C.]

Federal: (description)

- 40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).
- 40 CFR 61: Subpart M: NESHAP for Asbestos.
- 40 CFR 64: Compliance Assurance Monitoring
- 40 CFR 82: Protection of Stratospheric Ozone.
- 40 CFR 82: Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
- 40 CFR 82: Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

- 62-4.030, F.A.C.: General Prohibition.
- 62-4.040, F.A.C.: Exemptions.
- 62-4.050, F.A.C.: Procedure to Obtain Permits; Application
- 62-4.060, F.A.C.: Consultation.
- 62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
- 62-4.080, F.A.C.: Modification of Permit Conditions.
- 62-4.090, F.A.C.: Renewals.
- 62-4.100, F.A.C.: Suspension and Revocation.
- 62-4.110, F.A.C.: Financial Responsibility.
- 62-4.120, F.A.C.: Transfer of Permits.
- 62-4.130, F.A.C.: Plant Operation - Problems.
- 62-4.150, F.A.C.: Review
- 62-4.160, F.A.C.: Permit Conditions.
- 62-4.210, F.A.C.: Construction Permits.
- 62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

- 62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
- 62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding

Title V Core List

Effective:03/25/97

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(3)(a), F.A.C.: Full Exemptions.

62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.

62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject
to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.

62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form
and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.

62-213.400, F.A.C.: Permits and Permit Revisions Required.

62-213.410, F.A.C.: Changes Without Permit Revision.

62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.

62-213.420, F.A.C.: Permit Applications.

62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.

62-213.440, F.A.C.: Permit Content.

62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.

62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and
Instructions.

Title V Core List

Effective:03/25/97

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C.: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C.: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-13-96

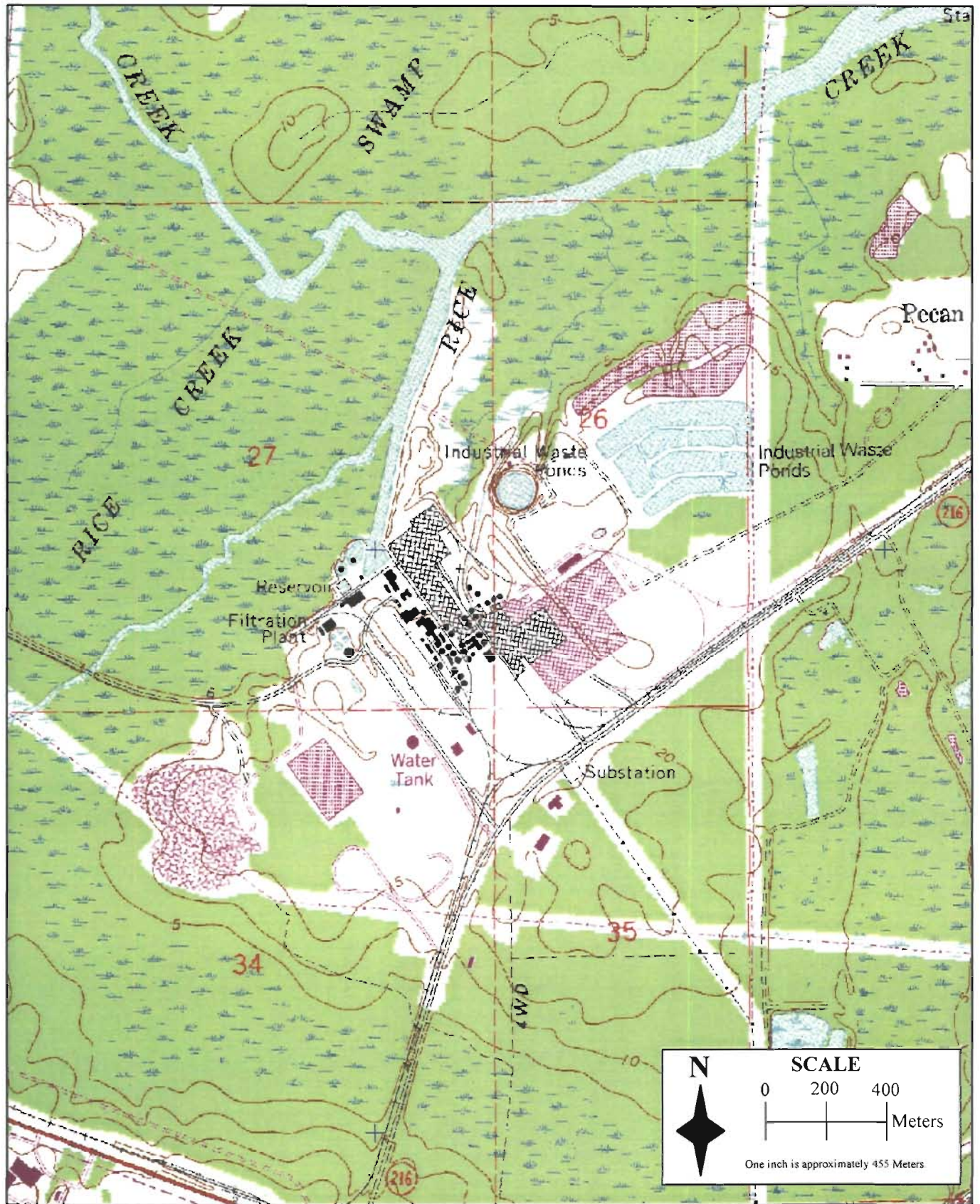
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

ATTACHMENT GP-FI-C1

AREA MAP SHOWING FACILITY LOCATION



Attachment GP-FI-C1
Area Map

Source: Golder, 2001.

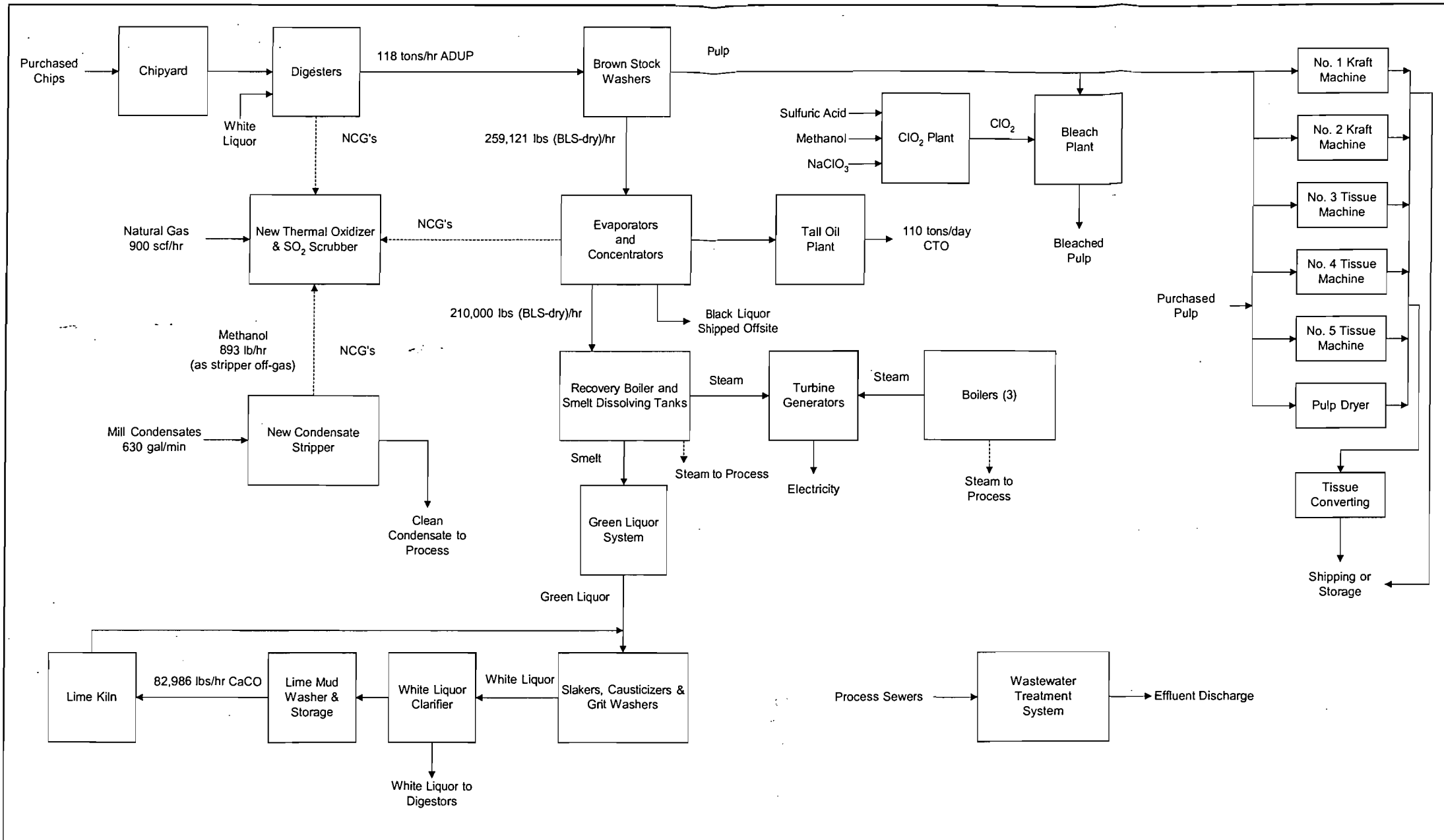


ATTACHMENT GP-FI-C2

FACILITY PLOT PLAN

ATTACHMENT GP-FI-C3

PROCESS FLOW DIAGRAM



Attachment GP-FI-E3
 Facility Process Flow Diagram for MACT I Compliance
 Georgia-Pacific Palatka Operations
 Palatka, Florida

Notes:
 ADUP = Air Dried Unbleached Pulp
 CTO = Crude Tall Oil
 Solid/Liquid →
 Gas →

Filename: 0037601Y/F1/WP/GP-FI-E3.VSD
 Date: 6/13/01



III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Tall Oil Plant			
4. Emissions Unit Identification Number: [] No ID ID: 031 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 26	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Packed tower scrubber

2. Control Device or Method Code(s): **050**

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		110 tons/day CTO
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	Maximum production rate: 110 tons of crude tall oil per 24-hour period with a yearly maximum of 32,000 tons of crude tall oil.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-297.310
62-297.401(1)(a)
62-297.401(2)
62-297.401(3)
62-297.401(4)
62-297.401(16)
62-297.401(16)(a)
62-297.401(16)(b)
62-296.404(3)(b)
62-296.404(4)(d)
62-296.404(4)(f)
62-296.404(5)(d)
62-296.404(6)(a)
62-296.404(6)(b)
62-296.404(6)(c)3.
62-296.404(6)(c)4.
62-296.404(6)(d)

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Tall Oil Plant		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 40 feet	7. Exit Diameter: 1.3 feet	
8. Exit Temperature: 150 °F	9. Actual Volumetric Flow Rate: 3,550 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Pulp and Paper and Wood Products, Sulfate (Kraft) Pulping; Other not classified		
2. Source Classification Code (SCC): 3-07-001-99		3. SCC Units: Tons ADUP
4. Maximum Hourly Rate: 118	5. Maximum Annual Rate: 675,250	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum annual rate is based on a maximum daily rate of 1,850 tons per day ADUP (monthly average).		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: TRS	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.14 lb/hour 0.5 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.031 lb TRS/ton CTO Reference: Permit No. 1070005-009-AC	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.031 lb TRS/ton CTO x 110 tons CTO/24-hours = 0.14 lb TRS/hr 32,000 tons/yr x 0.031 lb TRS/ton CTO x ton/2,000 lb = 0.5 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): The emission factor is based on a 12-hour average.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.031 lb TRS/ton CTO	4. Equivalent Allowable Emissions: 0.14 lb/hour 0.5 tons/year
5. Method of Compliance (limit to 60 characters): Stack test every 5 years using EPA Method 16 or 16A.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Permit No. 1070005-009-AC	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): <p>As per Permit No. 1070005-009-AC, measures scrubber ringheader flow as a surrogate parameter for TRS emissions. To show compliance, the minimum ringheader flow rate is 29 gpm.</p>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

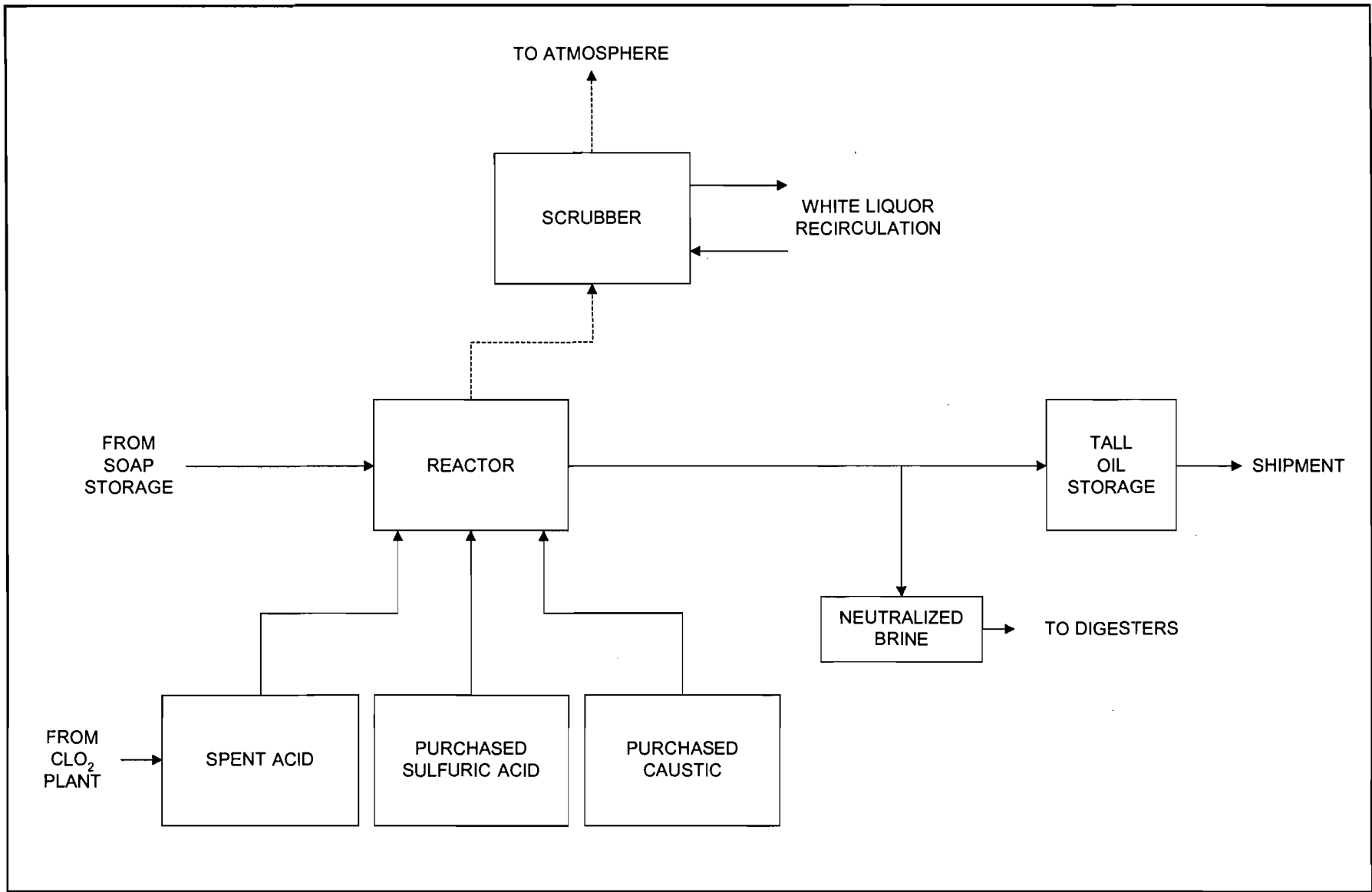
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>GP-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>GP-EU1-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input checked="" type="checkbox"/> Attached, Document ID: <u>GP-EU1-J4</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously submitted, Date: <u>12-15-00</u> <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: GP-EU1-J13 <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT GP-EU1-J1

PROCESS FLOW DIAGRAM



ATTACHMENT GP-EU1-J1
TALL OIL PLANT FLOW DIAGRAM
GEORGIA-PACIFIC PALATKA MILL

Process Flow Legend

Solid/Liquid ———→
Gas - - - - -→
Steam ·····→

Project: 0037601Y/F1/WP
Filename: GP-EU1-J1.VSD
Date: 6/13/01



ATTACHMENT GP-EU1-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT GP-EU1-J3**Control Equipment****Tall Oil Plant**

The Tall Oil Reactor is equipped with a packed tower scrubber for TRS control.

	Packed Tower Scrubber
Manufacturer	Dualam
Inside Diameter (inches)	54
Height of Packing (feet)	10.5
Operating Temperature (°F)	180
Scrubbing Liquor	White Liquor
Control Efficiency (%)	96

ATTACHMENT GP-EU1-J4

DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT GP-EU1-J4
DESCRIPTION OF STACK SAMPLING FACILITIES

The following is a description of the Tall Oil Plant stack sampling facilities [as required per Rule 62-297.310(6)].

Sampling Ports

1. All sampling ports have an inside diameter of approximately 4 inches.
2. The ports are capable of being sealed when not in use.
3. The sampling ports are located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. There are two sampling ports, each 90 degrees apart, and the stack has an outside diameter less than 15 feet (16 inches).

Work Platforms

1. The working platform is greater than 50 square feet in area and approximately 11 feet wide.
2. This circular stack has two sampling ports. A work platform which extends ≥ 110 degrees around the stack is not necessary for TRS sampling. Instead, the platform is located adjacent to the stack.
3. The platform is equipped with an adequate safety rail and toeboard.
4. The safety rail directly in line with the sampling ports is removable so that no obstruction exists in an area 10 inches below each sample port or within 6 inches on either side. This provides adequate space for running Methods 1-4 and 16.

Means of Access

1. Ladders to the work platform have safety cages.
2. Walkways over free fall areas are equipped with safety rails and toeboards.

Equipment Support Structures

1. An eyebolt and angle bracket are not required for performing EPA Methods 1-4 and 16.

ATTACHMENT GP-EU1-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS



Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

FEB 12 2001

GAINESVILLE

David B. Struhs
Secretary

CERTIFIED-RETURN RECEIPT

NOTICE OF PERMIT

Mr. David A. Spraley
Vice President, Palatka Operations
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32178-0919

Dear Mr. Spraley:

Putnam County – AP
Georgia-Pacific Corporation
Palatka Operations
Facility ID No. 1070005
Project: #009, Tall Oil Plant CP Revision

Enclosed is Permit Number 1070005-009-AC to construct the subject air pollution emissions unit(s), issued pursuant to Section 403.087, Florida Statutes (FS).

Any party to this Order (permit) has the right to seek judicial review of the permit under Section 120.68 of the Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Mail Station 35, 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 of Appeal must be filed within 30 days after this Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christopher L. Kirts, P. E.
District Air Program Administrator

CLK:JIC

c: David A. Buff, P.E., Q.E.P., Golder
Myra Carpenter, GP (EMAIL)

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Myra Carpenter 2/8/01
Clerk Date

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

PERMITTEE:

Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32178-0919

I.D. Number: 1070005
Permit/Cert Number: 1070005-009-AC
Date of Issue: February 06, 2001
Expiration Date: August 15, 2002
County: Putnam
Latitude/Longitude: 29°41'00"N; 81°40'45"W
UTM: E-(17)434.0 ; N-3283.4
Project: #009, Tall Oil Plant at
Palatka Mill

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-204, 62-210, 62-212, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Project 009, for the revision of the Emissions Unit (EU) 031, Tall Oil Plant, construction permit #AC54-108945 by changing the current production rate, the TRS emissions hourly rate, the compliance testing run period and the surrogate parameter monitoring requirements.

Located north of CR 216, west of US17, north of Palatka, Putnam County.

In accordance with:

Request for AC Permit revision received October 04, 2000
Additional information received January 05, 2001

"More Protection, Less Process"

Printed on recycled paper.

PERMITTEE:
Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32178-0919

I.D. Number: 1070005
Permit/Cert Number: 1070005-009-AC
Date of Issue: February 06, 2001
Expiration Date: August 15, 2002

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the 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 403.087(6) and 403.722(5), Florida Statutes, 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 the permit.
4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does 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 no 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 permitted 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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;

PERMITTEE:
Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32178-0919

I.D. Number: 1070005
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Date of Issue: February 06, 2001
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GENERAL CONDITIONS:

- 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 non-compliance; and
- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code 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:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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Expiration Date: August 15, 2002

GENERAL CONDITIONS:

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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - 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.

PERMITTEE:
Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32178-0919

I.D. Number: 1070005
Permit/Cert Number: 1070005-009-AC
Date of Issue: February 06, 2001
Expiration Date: August 15, 2002

SPECIFIC CONDITIONS:

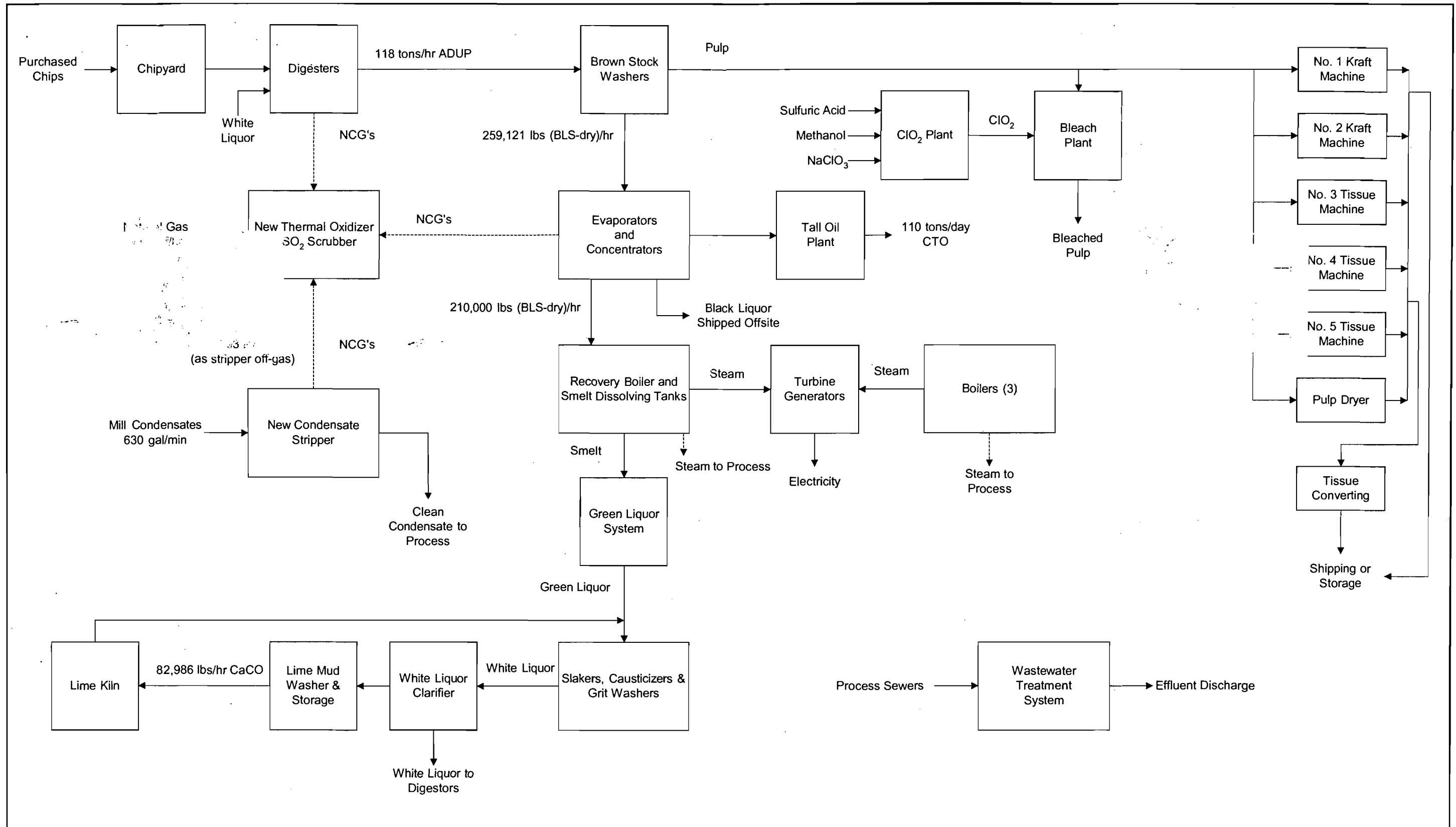
1. The I.D. No. and Project name for this source shall be used on all correspondence.
2. The Tall Oil operating rate shall not exceed 110 tons of crude tall oil per 24-hr period with a yearly maximum of 32,000 tons of crude tall oil.
{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}
[Rules 62-4.160(2) and 62-210.200(PTE)]
3. Hours of Operation. The hours of operation are not limited.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
4. Total Reduced Sulfur (TRS) emissions shall not exceed 0.031 lb TRS/ton of Tall Oil as 12-hr avg; 0.14 lb/hr and 0.5 TPY.
[Rule 62-296.404(3)(b)1., F.A.C.; applicant request]
5. Total Reduced Sulfur (TRS) emissions testing shall comply with the applicable requirements of Rule 62-296.404(4)(d), F.A.C., Rule 62-297.401(16), F.A.C. (EPA Method 16 or 16A, incorporated and adopted by reference in Chapter 62-297, F.A.C.) and performed every 5 years with a frequency base date of 04/30/1999.
The testing shall be comprised of two runs with one run covering the entire acidulation portion of the cook and the other run covering the entire neutralization portion of the cook.
6. Total Reduced Sulfur (TRS) emissions continuous monitoring device shall measure the surrogate minimum flow rates (scrubber ringheader inlet flow rate of 29 gpm and scrubber makeup flow rate of 98 gpm) during the entire cook.
7. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
8. An application for a revision to Title V permit shall be submitted no later than 180 days after this emission unit commences operation in accordance with the terms of this construction permit. The permittee shall provide written notice to this Office when this Emission Unit commences operation based on this construction permit.
[Rule 62-213.420(1)(a)5, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida
Statutes, with the designated Department Clerk.
receipt of which is hereby acknowledged.
Joselyn Benefield 2/8/01
Clerk Date


Christopher L. Kirts, P.E.
District Air Program Administrator



Attachment GP-FI-E3
 Facility Process Flow Diagram for MACT I Compliance
 Georgia-Pacific Palatka Operations
 Palatka, Florida

Notes:
 ADUP = Air Dried Unbleached Pulp
 CTO = Crude Tall Oil
 Solid/Liquid →
 Gas - - - - -

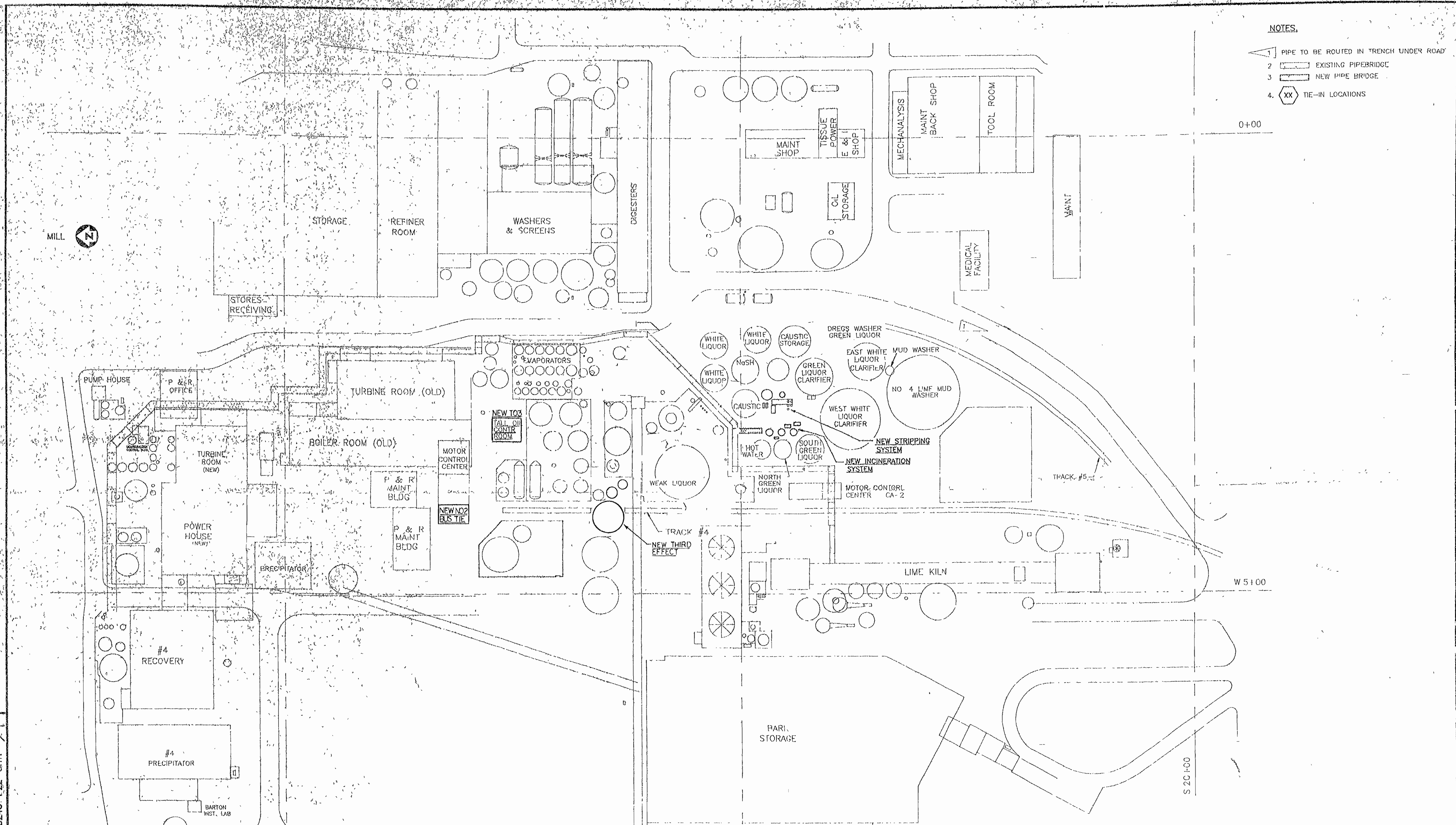
Filename: 0037601Y/F1/WP/GP-FI-E3.VSD

Date: 6/13/01



NOTES.

- 1 PIPE TO BE ROUTED IN TRENCH UNDER ROAD
- 2 EXISTING PIPEBRIDGE
- 3 NEW PIPE BRIDGE
- 4 XX TIE-IN LOCATIONS



SPEC. AL-985248-P22 SH. 1/1

THIS DRAWING IS THE PROPERTY OF A.H. LUNDBERG ASSOCIATES AND IS TO BE RETURNED UPON REQUEST. IT IS LOANED UPON CONDITION THAT IT WILL NOT BE REPRODUCED IN WHOLE OR IN PART, OR USED TO FURNISH INFORMATION TO OTHERS, OR FOR ANY PURPOSE OTHER THAN WORK AUTHORIZED BY A.H. LUNDBERG ASSOCIATES.

REV	DESCRIPTION	BY	DATE	CHK	DATE	REV	DESCRIPTION	BY	DATE	CHK	DATE

ITEM	NO.	DESCRIPTION	MATL.	REFERENCE
REFERENCE ONLY JUN 1 1998				
DRAWN BY: CH		A.H. LUNDBERG ASSOCIATES, INC.		
DATE: 5/18/98		P.O. Box 597, Bellevue, Washington 98009		
MILL PLOT PLAN				
APP BY:	SCALE: 1"=50'-0"	EQUIP. NO.:	DRAWING NO.:	SHT.:
DATE:			AL-985248-P22	1/1

Kofax Separator

Application