

*Georgia Pacific  
File*

~~FILE~~

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
**INTEROFFICE MEMORANDUM**

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

TO: Victoria J. Tschinkel  
FROM: Clair Fancy *Clair Fancy*  
DATE: October 30, 1981  
SUBJ: Approval and Signature of Attached Air  
Construction Permit described below.

Attached please find one Air Construction Permit for which the applicant is the Georgia-Pacific Corporation. The proposed construction is a combination boiler at the applicants facility near Palatka, Putnam County, Florida.

Day 90, after which the permit would be issued by default is November 2, 1981.

The Bureau recommends your approval and signature.

CF/bjm

Enclosure

**SENDER:** Complete items 1, 2, and 3.  
 Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered. ----- c  
 Show to whom, date and address of delivery. ----- c  
 **RESTRICTED DELIVERY**  
 Show to whom and date delivered. ----- c  
 **RESTRICTED DELIVERY**  
 Show to whom, date, and address of delivery. S -----  
 (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**  
 Mr. Roger C. Sherwood  
 P.O. Box 919 - G.P.  
 Palatka, TP 32077

3. **ARTICLE DESCRIPTION:**  

|                |               |             |
|----------------|---------------|-------------|
| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|                | 7682495       |             |

 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE:  Addressee  Authorized Agent  
*Johanna Peterson*

4. **DATE OF DELIVERY:** \_\_\_\_\_  
**POSTMARK:** PALATKA, FLA. NOV 1981

5. **ADDRESS (Complete only if requested):** \_\_\_\_\_

6. **UNABLE TO DELIVER BECAUSE:** \_\_\_\_\_  
**CLERK'S INITIALS:** *AW*

PS Form 3817, Jan. 1978  
 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

November 2, 1981

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

Dear Mr. Sherwood:

AC 54-43773  
AC 54-43791  
Enclosed is Permit Number AC 54-43795, dated November 2, 1981  
to Georgia-Pacific Corporation  
issued pursuant to Section 403, Florida Statutes.

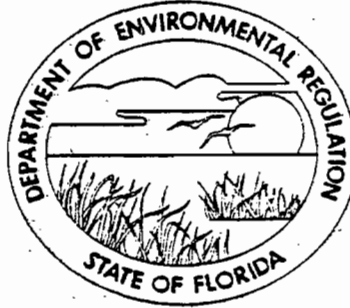
Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

CHF/bjm

Enclosure



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 54-43773

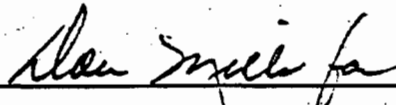
GEORGIA-PACIFIC CORPORATION  
COMBINATION BOILER No. 5  
PUTNAM COUNTY, FLORIDA

DATE OF ISSUANCE

Nov. 2, 1981

DATE OF EXPIRATION

DECEMBER 31, 1983

  
VICTORIA TSCHINKEL,  
SECRETARY



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 54-43791

GEORGIA-PACIFIC CORPORATION  
RECOVERY BOILER No. 5 AND  
TWO SMELT TANKS No. 5

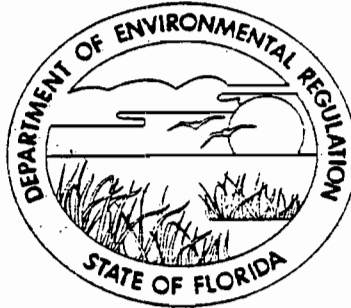
DATE OF ISSUANCE

Nov. 2, 1981

DATE OF EXPIRATION

DECEMBER 31, 1985

*Victoria Tschinkel*  
VICTORIA TSCHINKEL,  
SECRETARY



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 54-43795

GEORGIA-PACIFIC CORPORATION  
LIME KILN No. 5  
PUTNAM COUNTY, FLORIDA

DATE OF ISSUANCE

Nov. 2, 1981

DATE OF EXPIRATION

DECEMBER 31, 1985

*Victoria Tschinkel*  
VICTORIA TSCHINKEL,  
SECRETARY

FINAL DETERMINATION

Georgia-Pacific Corporation  
Palatka, Florida

Application Numbers:

AC 54-43773  
AC 54-43791  
AC 54-43795

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

October 29, 1981

Georgia-Pacific Corporation Construction Permit  
Final Determination

Georgia-Pacific Corporation's Construction Permit applications for the construction of a recovery boiler, 2 smelt tanks, a lime kiln, and a combination boiler that will be fired with bark and/or peat, to modify their existing kraft pulp mill in Palatka, Florida, has been reviewed by the Department. The Department has assessed the impact of this project and has determined that there will be no harmful effects to the environment or to public health. Public notice of the "Departments Intent to Issue a Construction Permit" was published in the Palatka Daily News on September 28, 1981. Copies of the "Preliminary Determination" were available for public inspection at the Florida Department of Environmental Regulation's St. Johns River Subdistrict office and at the Bureau of Air Quality Management office.

Comments were received on the preliminary determination from Georgia-Pacific Corporation and their consultant, Environmental Science and Engineering of Gainesville, Florida. These comments are located in Attachment B. The significant changes are 1) July 13, 1981 BACT revised on September 24, 1981 because peat was changed to reflect an unclassified fuel, 2) October 1, 1981 process description change under the section "Process and Controls", 3) October 20, 1981 correction of boiler steam temperatures for the combination and recovery boilers under "Specific Conditions", and 4) October 27, 1981 correction of the TRS emissions for the recovery boiler (transcribed incorrectly) and a change in the SO<sub>2</sub> emissions due to a change in the emission limit from 50 ppm<sub>2</sub> to 150 ppm-corrected to 8% oxygen (this value is the correct emission limit declared as BACT by EPA). The BACT and the construction permit package were changed to reflect this emission rate change. The applicant modeled the SO<sub>2</sub> emissions at 250.0 lbs./hr. and should have modeled at 293.88 lbs./hr. This increase is still considered insignificant compared to the total increment consumed and will not warrant remodeling.

The final action of the Department will be to issue the permit as noticed in the public review process.



PERMIT CONDITIONS

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43773

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Combination  
Boiler No. 5 (fired with  
bark and/or peat).

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a combination boiler to produce a maximum of 700,000 lbs./hr. of steam, fired with bark and/or peat, equipped with an electrostatic precipitator, and will use No. 6 Fuel Oil, (maximum 2.5% Sulfur content, not to exceed 40 barrels/hr. - maximum  $250 \times 10^6$  Btu/hr. heat input), as an auxiliary fuel for startup, shutdown, and emergency only. Permitted hours of operation will be 8760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122 (16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachment B).
4. Stack sampling drawing.
5. DER's letter of October 1, 1981 (change in process description - via phone call from Vernon Adams, see Attachment B).
6. DER's letter of October 7, 1981 (correcting the DER FORM number, see Attachment B).
7. GPC's letter of October 9, 1981 (change of boiler steam temperature, see Attachment B).
8. GPC's letter of October 19, 1981 (change of TRS and SO<sub>2</sub> emissions-recovery boiler; also, a revision in the BACT was required-signed October 27, 1981, see Attachment B and A respectively).

PAGE 1 OF 4

PERMIT NO.: AC 54-43773  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
  - Determination of Best Available Control Technology (BACT)
  - Determination of Prevention of Significant Deterioration (PSD)
  - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 54-43773  
 APPLICANT: Georgia-Pacific Corporation

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum steam generation will be 700,000 pounds per hour at 980°F.
5. Maximum bark consumption will be 254,965 pounds per hour with a maximum heat input of  $1083.6 \times 10^6$  Btu per hour.
6. Maximum peat consumption will be 217,869 pounds per hour with a maximum heat input of  $1005.9 \times 10^6$  Btu per hour.
7. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, and emergency. Maximum sulfur content is 2.5%. Maximum consumption will be 40 barrels per hour with a maximum heat input of  $250 \times 10^6$  Btu per hour.
8. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limitation</u>  | <u>Maximum Allowable Emissions</u><br>(lbs./hr.) |             |
|--------------------|---|--|-------------|
|                    |   | <u>Bark</u>                                      | <u>Peat</u> |
| Particulate Matter | 0.10 lbs./ $10^6$ Btu heat input  | 108.36   | 100.59      |
| SO <sub>2</sub>    | 0.65 lbs./ $10^6$ Btu heat input  | 704.34   | 653.84      |
| NO <sub>x</sub>    | 0.30 lbs./ $10^6$ Btu heat input  | 325.08   | 301.77      |
| VE                 | 20% maximum Opacity (except for one 6-minute period per hour of not more than 27% Opacity). |  |             |

PERMIT NO.: AC 54-43773  
APPLICANT: Georgia-Pacific Corporation

Specific Conditions (Cont'd)

9. To assure compliance of the emission limits imposed through BACT the applicant shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions. Testing for particulate matter will be EPA reference methods 1, 2, 3, 5 and 9 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source and/or 17-2.23, FAC. Stack sampling facilities will include the eyebolts and angle described in the attached figure.
10. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions as described in "Specific Condition No. 9".
11. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
12. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, and amount of steam produced.

Expiration Date: December, 1983

Issued this 2 day of November, 1981

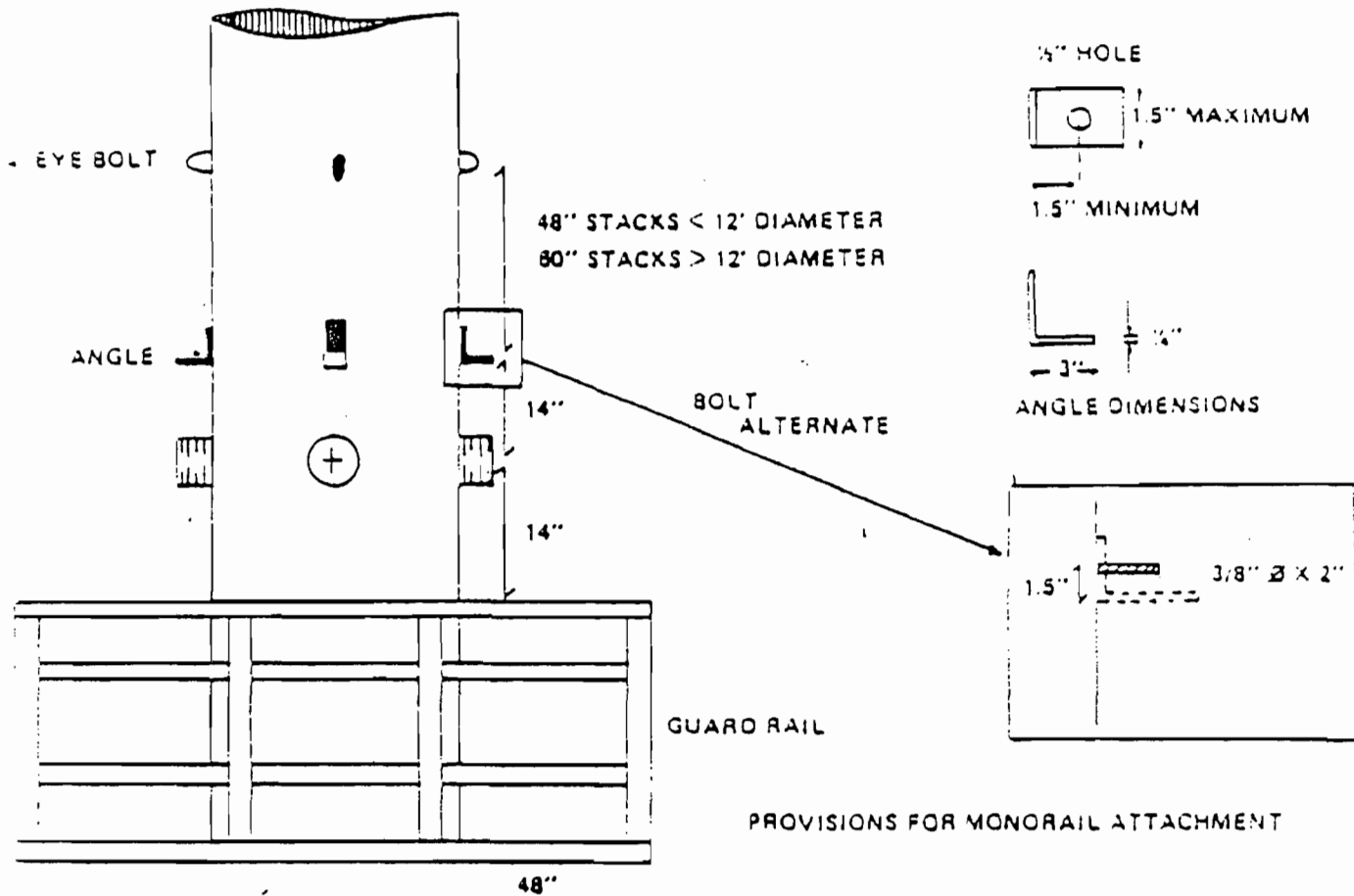
           Pages Attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

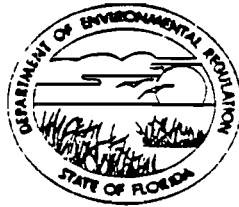
  
Signature

PAGE 4 OF 4

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43791

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Recovery  
Boiler No. 5 and two  
Smelt Dissolving Tanks  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2  
and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to  
perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and  
made a part hereof and specifically described as follows:

For the construction of a recovery boiler to produce a maximum of 607,500  
lbs./hr. of steam, equipped with an electrostatic precipitator. In  
addition, two smelt dissolving tanks will be constructed, equipped with  
a wet scrubber each. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and  
application amendments, documents, and drawings except as otherwise  
noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of  
operating hours, see Attachment B).
4. Stack sampling drawing.
5. DER's letter of October 1, 1981 (change in process description -  
via phone call from Vernon Adams, see Attachment B).
6. DER's letter of October 7, 1981 (correcting the DER FORM number,  
see Attachment B).
7. GPC's letter of October 9, 1981 (change of boiler steam temperature,  
see Attachment B).
8. GPC's letter of October 19, 1981 (change of TRS and SO<sub>2</sub> emissions-  
recovery boiler; also a revision in the BACT was required-signed  
October 27, 1981, see Attachment B and A respectively).

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions," and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
  - Determination of Best Available Control Technology (BACT)
  - Determination of Prevention of Significant Deterioration (PSD)
  - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)



PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the sources.
3. Operation time will be 8,760 hours per year.
4. Maximum steam generation will be 607,500 pounds per hour at 900°F. Maximum black liquor, at 65% solids, consumption will be 230,679 pounds per hour with a maximum heat input of  $990 \times 10^6$  Btu per hour, yielding 63,000 pounds per hour of smelt.
5. Maximum total smelt utilization in the smelt dissolving tanks is 63,000 pounds per hour.
6. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, emergency and system checking. Maximum sulfur content is 2.5%. Maximum consumption will be 23.8 barrels per hour with a maximum heat input of  $146 \times 10^6$  Btu per hour.
7. Maximum allowable emissions are:

Recovery Boiler No. 5:

| <u>Pollutant</u>              | <u>Emission Limitation</u>                                     | <u>Maximum Allowable Emissions</u><br><u>(lbs./hr.)</u> |
|-------------------------------|--|---|
| Particulate Matter            | 0.044 grains/DSCF<br>corrected to 8% oxygen                    | 75.4  |
| Total Reduced<br>Sulfur (TRS) | 5 ppm. by volume on a<br>dry basis, corrected to<br>8% oxygen. | 5.2   |
| SO <sub>2</sub>               | 150 ppm., corrected to<br>8% oxygen                            | 293.88  |
| Visible Emissions             | 30% maximum Opacity  |   |

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific

Smelt Dissolving Tanks No. 5:

| <u>Pollutant</u>   | <u>Emission Limitation</u>                       | <u>Maximum Allowable Emissions</u><br>(total)<br>(lbs./hr.) |
|--------------------|--|---|
| Particulate Matter | 0.2 lbs./ton black liquor solids (dry weight)    | 15.0  |
| TRS                | 0.0168 lbs./ton black liquor solids (dry weight) | 1.26  |

8. To assure compliance of the emission limits imposed through BACT and New Source Performance Standards (NSPS), 40 CFR 60, Subpart BB, the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring opacity of emissions and TRS emissions from the recovery boiler.
9. For emissions from the recovery boiler and smelt tanks, compliance test procedures will be EPA reference methods 1, 2, 3, 5, 9 and 16 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source. Stack sampling facilities will include the eyebolt and angle described in the attached figure.
10. Before the construction permit expires, the recovery boiler and two smelt tanks will be sampled for pollutant emissions as described in "Specific Condition No. 9".
11. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
12. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, and amount of steam produced.

Expiration Date: December, 1985

Issued this 2 day of Nov, 1981

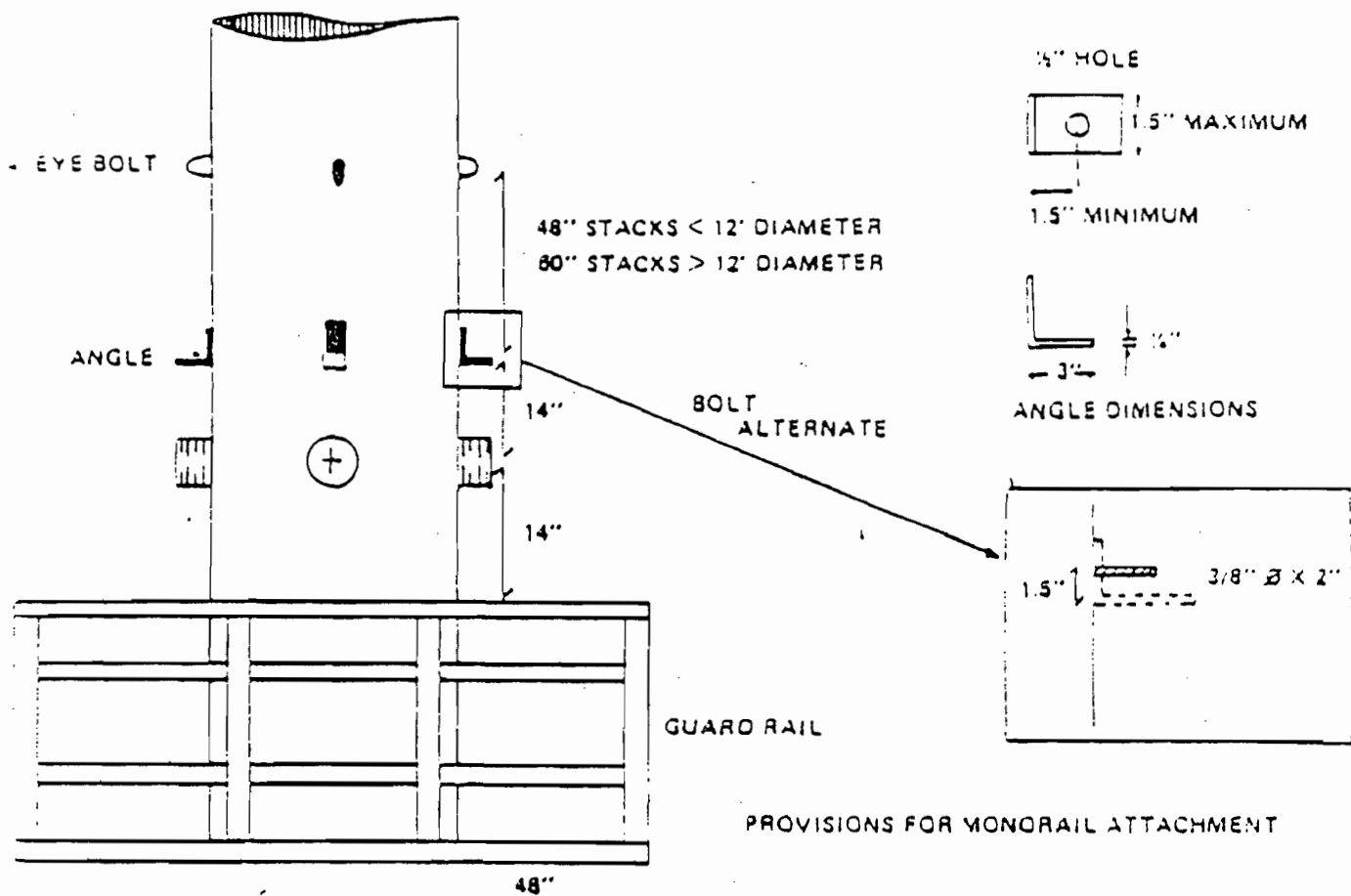
Pages Attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

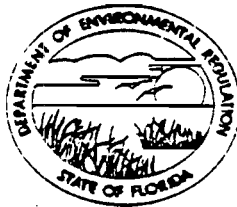


Signature

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL OUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43795

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Lime Kiln  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2  
and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a lime kiln with a maximum capacity of 320 tons per day, equipped with a high energy venturi scrubber. No. 6 Fuel Oil maximum consumption will be 16.6 barrels per hour with a maximum heat input of  $102 \times 10^6$  Btu per hour. Maximum sulfur content is 2.5%. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachment B).
4. Stack sampling drawing.
5. DER's letter of October 1, 1981 (change in process description via phone call from Vernon Adams, see Attachment B).
6. DER's letter of October 7, 1981 (correcting the DER FORM number, see Attachment B).
7. GPC's letter of October 9, 1981 (change of boiler steam temperature, see Attachment B).
8. GPC's letter of October 19, 1981 (change of TRS and SO<sub>2</sub> emissions-recovery boiler; also, a revision in the BACT was required-signed October 27, 1981, see Attachment B and A respectively).

PERMIT NO.: AC 54-43795  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 54-43795  
APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum capacity is 320 tons per day.
5. No. 6 Fuel Oil maximum consumption is 16.6 barrels per hour with a maximum heat input of  $102 \times 10^6$  Btu per hour. Maximum sulfur content is 2.5%.
6. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limit</u>                                     | <u>Maximum Allowable Emissions</u><br><u>(lbs./hr.)</u> |
|--------------------|---|---|
| Particulate Matter | 0.13 grains/DSCF<br>(corrected to 10% oxygen)             | 29.31   |
| TRS                | 8 ppm. by volume on a dry basis (corrected to 10% oxygen) | 1.09  |
| VE                 | 20% maximum Opacity                                       |   |

7. To assure compliance of the emission limits imposed through BACT and New Source Performance Standards (NSPS), 40 CFR 60, Subpart BB, the applicant shall install, calibrate, maintain and operate a continuous monitoring system for measuring TRS.
8. Testing for emissions will be EPA reference methods 1, 2, 3, 5, 9 and 16 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source. Stack sampling facilities will include eyebolts and angle as described in the attached figure.

PERMIT NO.: AC 54-43795

APPLICANT: Georgia-Pacific Corporation

9. Before the construction permit expires, the proposed lime kiln will be sampled for pollutant emissions as described in "Specific Condition No. 8".
10. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
11. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, pH and pressure drop.

Expiration Date: December, 1985

Issued this 2 day of November, 1981

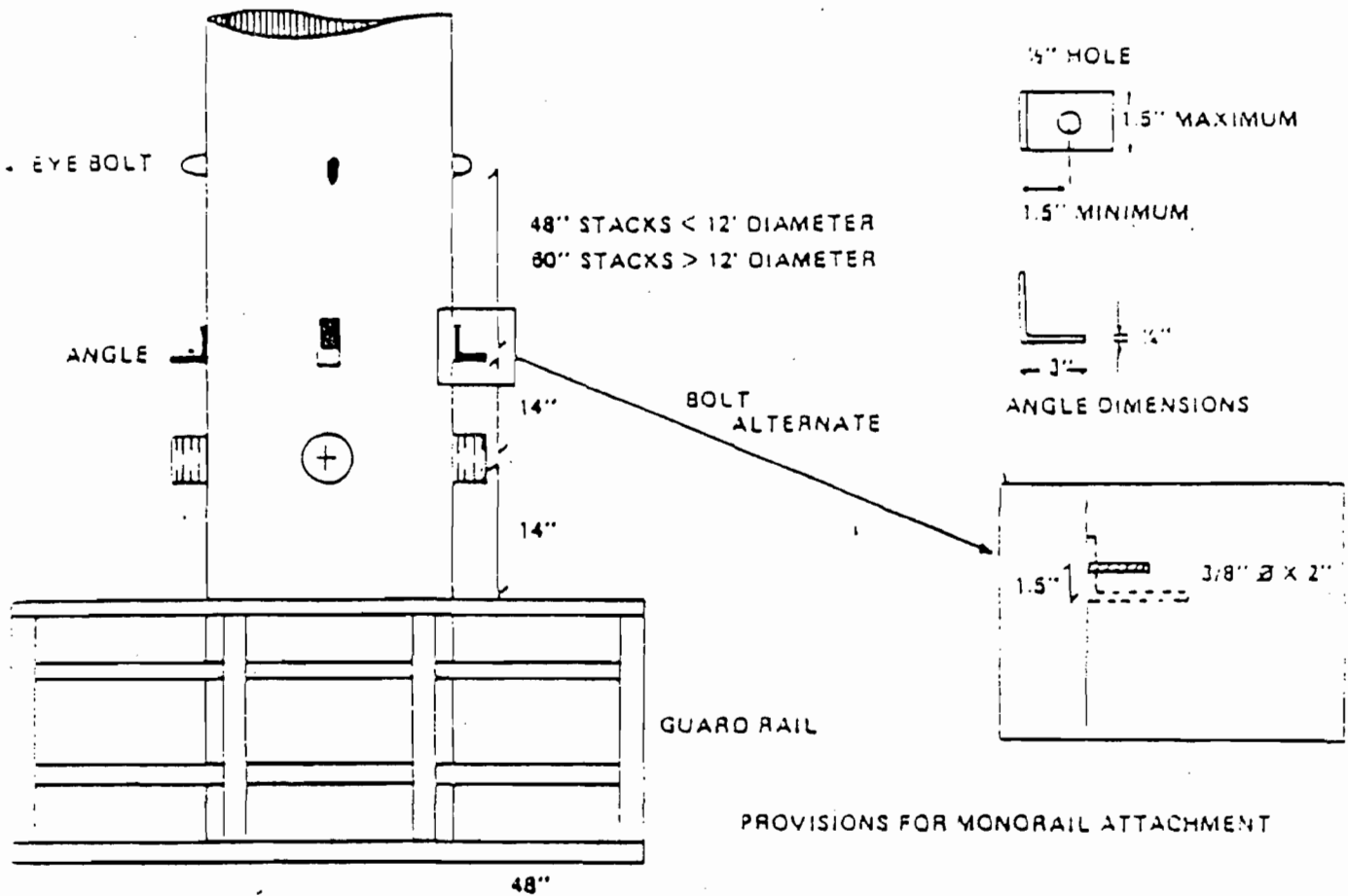
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

\_\_\_\_\_ Pages Attached.

  
Signature

PAGE 4 OF 4

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK I.B. WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.



12:17:105

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
**INTEROFFICE MEMORANDUM**

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

TO: Victoria Tschinkel

FROM: Steve Smallwood *CSJ*

DATE: October 27, 1981

SUBJ: Amended BACT determination for Georgia-Pacific Corporation

**RECEIVED**

OCT 27 1981

Office of the Secretary

Attached please find an amended BACT determination for subject applicant. We recommend that you approve and sign the amendment, the result of which will be made a specific condition of the construction permit.

SS:caa

Best Available Control Technology (BACT) Determination  
Amendment

Georgia-Pacific Corporation  
Putnam County

The applicant plans to increase unbleached pulp production at their facility located in Palatka, Florida. A BACT determination was issued July 13, 1981.

BACT Revision Requested by the Applicant:

The applicant has requested the SO<sub>2</sub> emission limit of 50 ppm for the recovery boiler be changed to 150 ppm. The 50 ppm stated on the application was their typographical error and should have read 150 ppm.

Amended BACT Determination by DER:

The SO<sub>2</sub> emission limit for the black liquor recovery boiler No. 5 is changed to read: "150 ppm, corrected to 8 percent oxygen".

The last paragraph on Page 3 of the BACT issued July 13, 1981 is changed to read.

*"The emission limits determined as BACT for the recovery furnace pollutants: particulates, total reduced sulfur (TRS) and opacity are equal to NSPS, Subpart BB. The moisture content of the black liquor and the reducing atmosphere above the smelt bed tends to inhibit both flame temperature and oxygen levels in the combustion zone. This normally limits the concentration of NO<sub>x</sub> emitted. BACT for the control of NO<sub>x</sub> and CO is to maintain furnace operation within range of the design parameters. The SO<sub>2</sub> emission limit agrees with the latest BACT determination by EPA."*

Justification of Determination Amendment:

The Department used the SO<sub>2</sub> emission limit proposed by the applicant since it was more stringent than previous determinations. The Department acknowledges the applicant's typographical error and has changed the SO<sub>2</sub> emission limit to be equal to the most current EPA and Departmental determinations for a similar source.

Page Two

Details of the Analysis May be Obtained by Contacting:

Edward Palagyi, BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Recommended By:

for                       
Steve Smallwood, Chief, BAOM

Date:

                    10/27/81                    

Approved:

                    Victoria Tschinkel                      
Victoria Tschinkel, Secretary

Date:

                    10/28/81                    

SS:caa



Georgia-Pacific Corporation Palatka Operations  
Southern Pulp & Paper Division  
P.O. Box 919  
Palatka, Florida 32078-0919  
Telephone (904) 325-2004

NOV 1988  
MAY 3 1989  
REGULATIVE  
DER-JACKSONVILLE

RECEIVED

MAY 3 1989

DER-BAQM

April 28, 1989

Mr. William Stewart  
Florida Department of Environmental Regulation  
3426 Bills Rd.  
Jacksonville, Florida 32207

Dear Bill;

We recently received letters from you requesting that we submit operating permit applications for our No. 5 Recovery Boiler, No. 5 Smelt Dissolving Tanks, No. 5 Lime Kiln, and No. 5 Combination Boiler. These are sources for which we currently have construction permits, but have not as yet constructed. Due to changes in economic conditions and foreseeable plans for the mill we do not intend to construct these sources at this time and do acknowledge that the construction permits will expire in July of 1989. We do however appreciate all of the assistance the department has provided in helping us to obtain these permits.

If you have any questions, please call me at 904-325-2001.

Sincerely,

Vernon L. Adams  
Superintendent of  
Environmental Affairs

cc: W. L. Baxter  
H. Hirschman  
E. Schmidt

cc: Wayne Aronson, Region IV, EPA

PSD-FL-079  
AC 54-43773

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

- 1. TO: (NAME, OFFICE, LOCATION) *DARM,*  
*Bill Thomas, BAQM, CAPS*
- 2. *Boman* *Rec* *5-4-89*
- 3. *Bruce - 5-3*
- 4. *FYI -*

|         |
|---------|
| Initial |
| Date    |
| Initial |
| Date    |
| Initial |
| Date    |
| Initial |
| Date    |

REMARKS:

*FYI*

*I guess send thru Bill to me for file - Thanks Patty*

**INFORMATION**

- Review & Return
- Review & File
- Initial & Forward

**RECEIVED**

MAY 3 1989

DER - BAQM

Files: *PSA-FL-079*  
*AC 54-43773*

*Patty,*  
*We might want to send a copy to EPA, Region IV: Wayne Aronson*

**DISPOSITION**

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM:

*Johnny Cole*

DATE

*05-02-89*

PHONE

PM  
1 Feb. 1988  
Palatka, JH

File Copy



Georgia-Pacific Corporation Palatka Operations  
Southern Pulp & Paper Division  
P.O. Box 919  
Palatka, Florida 32078-0919  
Telephone (904) 325-2001

January 28, 1988

DER

FEB 2, 1988

BAQM

Mr. Bruce Mitchell  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Bruce;

Please find enclosed a copy of the letter we received which extended the expiration dates for permits AC 54-43773, AC 54-43791, and AC 54-43795. If you need additional information please call me.

Sincerely,

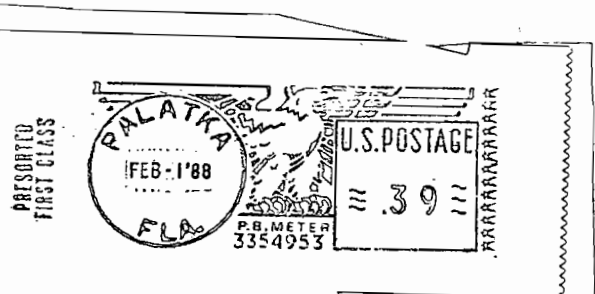
Vernon L. Adams  
Supervisor of  
Environmental Affairs

cc: W. L. Baxter

Copied: Mike Bailey }  
CHF/BT } 2.2.88 (m)

2-2-88  
FYI  
(i)

2-2-88  
Mike:  
Should I copy  
anyone else?  
(i)



# Georgia-Pacific



Palatka Operations  
Southern Pulp & Paper Division  
P.O. Box 919  
Palatka, FL 32078-0919

VERNON L. ADAMS

MR. BRUCE MITCHELL  
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

P 408 530 355

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

|   |    |
|---|----|
| Sent to<br>Vernon L. Adams                                    |    |
| Street and No.  |    |
| P.O., State and ZIP Code                                      |    |
| Postage   | \$ |
| Certified Fee   |    |
| Special Delivery Fee  |    |
| Restricted Delivery Fee                                       |    |
| Return Receipt Showing to whom and Date Delivered             |    |
| Return Receipt Showing to whom, Date, and Address of Delivery |    |
| TOTAL Postage and Fees  | \$ |
| Postmark or Date<br>11/18/83                                  |    |

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered.....  
 Show to whom, date and address of delivery.....  
 RESTRICTED DELIVERY  
 Show to whom and date delivered.....  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery \$.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Mr. Vernon L. Adams  
 Georgia-Pacific  
 P. O. Box 919  
 Palatka, FL 32077

3. ARTICLE DESCRIPTION:  

|                |               |             |
|----------------|---------------|-------------|
| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|                | P408530355    |             |

 (Always obtain signature of addressee or agent)  
 I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY  
 NOV 22 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK  
 NOV 22 1983  
 PALATKA  
 CLERK'S INITIALS





**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

**RECEIVED**

August 24, 1982

SEP 7 1982

Dept. of Environmental Regulation  
Office of General Counsel

AUG 26 1982

EAQW

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

Dear Clair:

The current construction permit No. AC54-43773 for Georgia-Pacific's No. 5 Combination Boiler expires in December of 1983. It is our intent to burn peat harvested from within the State of Florida as the main fuel in this unit. We have met delays in obtaining the required environmental permits to harvest the peat and we wish to delay construction of this boiler at this time. We hereby request an extension of this construction permit through December 1985.

If you have any comments or questions please contact me at 904/325-2001.

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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

DEPARTMENT OF ENVIRONMENTAL REGULATION

|                                     |                 |
|-------------------------------------|-----------------|
| <b>ROUTING AND TRANSMITTAL SLIP</b> | ACTION NO.      |
|                                     | ACTION DUE DATE |

|   |         |
|---|---------|
| 1. TO: (NAME, OFFICE, LOCATION)   | INITIAL |
| <i>Chris Faney</i>  | DATE    |
| 2. <i>Bill - please tone</i> <b>DER</b>   | INITIAL |
|   | DATE    |
| 3. <i>letter drafted extending</i> <b>SEP 08 1982</b><br><i>these prints as requested</i> | INITIAL |
|   | DATE    |
| 4. <b>BAQM</b>  | INITIAL |
|   | DATE    |

REMARKS:

*I have no problems with extended <sup>ing</sup> either one. I would like to know why G-P is asking so early, though. (P.S. Talked to district lawyer for Jacksonville. G-P has been unable to get dredge & fill permit to mine peat. They are now trying to get approval as a pilot project.)*

|                          |                    |
|--------------------------|--------------------|
| INFORMATION              |                    |
| <input type="checkbox"/> | REVIEW & RETURN    |
| <input type="checkbox"/> | REVIEW & FILE      |
| <input type="checkbox"/> | INITIAL & FORWARD  |
| DISPOSITION              |                    |
| <input type="checkbox"/> | REVIEW & RESPOND   |
| <input type="checkbox"/> | PREPARE RESPONSE   |
| <input type="checkbox"/> | FOR MY SIGNATURE   |
| <input type="checkbox"/> | FOR YOUR SIGNATURE |
| <input type="checkbox"/> | LET'S DISCUSS      |
| <input type="checkbox"/> | SET UP MEETING     |
| <input type="checkbox"/> | INVESTIGATE & REPT |
| <input type="checkbox"/> | INITIAL & FORWARD  |
| <input type="checkbox"/> | DISTRIBUTE         |
| <input type="checkbox"/> | CONCURRENCE        |
| <input type="checkbox"/> | FOR PROCESSING     |
| <input type="checkbox"/> | INITIAL & RETURN   |

FROM: *Mark Hall*

|       |            |
|-------|------------|
| DATE  | <i>9/8</i> |
| PHONE |            |

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

*Marta Hall*

INITIAL

DATE

2.

INITIAL

DATE

3.

INITIAL

DATE

4.

INITIAL

DATE

REMARKS:

*Do you see any problems with granting these applications? I would grant them for refined metals & tell Georgetown to reapply when it gets near to application date.*

**RECEIVED**

SEP 7 1982

Dept. of Environmental Regulation  
Office of General Counsel

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW A RESPONSE

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & COPY

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

*Clair Joney*

DATE

*9/7*

PHONE

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

**SENDER:** Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- Show to whom and date delivered.....¢
  - Show to whom, date and address of delivery.....¢
  - RESTRICTED DELIVERY  
Show to whom and date delivered.....¢
  - RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery.\$\_\_\_\_\_
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Mr. Roger C. Sherwood  
 P.O. Box 919 - G.P.  
 Palatka FL 32077

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|----------------|---------------|-------------|
|                | 7682495       |             |

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized Agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



Georgia Pacific

5/18/81

proposed 1200 tpd pulp expansion phone

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

See PSD-FL-079

for complete copy

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 33573

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Georgia-Pacific Corporation Date June 2, 1981

Address Palatka Division, Palatka, FL 32077 Dollars \$ 100<sup>00</sup>

Applicant Name & Address (above)

Source of Revenue \_\_\_\_\_

Revenue Code 0101 Application Number AC 54-43773  
43791 43795

By Jim Jewell

Start CAPS hanging file:

{ Georgia-Pacific Corp.  
Palatka }

1-1-11

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

**INTEROFFICE MEMORANDUM**

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

TO: Steve Smallwood  
Mary Clark

FROM: John Svec *JS*

DATE: February 10, 1981

SUBJ: Bubble Proposal of Georgia Pacific Company - Palatka Plant

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

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

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

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

JS:dav

John Socc.  
File  
Bubble

x Ga Pacific?

FILE #

New file  
for bubble applications







Georgia-Pacific Corporation Palatka Operations  
Southern Pulp & Paper Division  
P.O. Box 919  
Palatka, Florida 32078-0919  
Telephone (904) 325-2001

RECEIVED  
MAY 3 1989  
DER-JACKSONVILLE

RECEIVED

MAY 3 1989

DER-BAQM

April 28, 1989

Mr. William Stewart  
Florida Department of Environmental Regulation  
3426 Bills Rd.  
Jacksonville, Florida 32207

Dear Bill;

We recently received letters from you requesting that we submit operating permit applications for our No. 5 Recovery Boiler, No. 5 Smelt Dissolving Tanks, No. 5 Lime Kiln, and No. 5 Combination Boiler. These are sources for which we currently have construction permits, but have not as yet constructed. Due to changes in economic conditions and foreseeable plans for the mill we do not intend to construct these sources at this time and do acknowledge that the construction permits will expire in July of 1989. We do however appreciate all of the assistance the department has provided in helping us to obtain these permits.

If you have any questions, please call me at 904-325-2001.

Sincerely,  
*Vernon L. Adams*  
Vernon L. Adams  
Superintendent of  
Environmental Affairs

cc: W. L. Baxter  
H. Hirschman  
E. Schmidt  
cc: Wayne Aronson, Region IV, EPA

PSD-FL-079  
AC 54-43773

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

*Bill Thomas, DARM, BAQM, CAPS*

Initial

Date

2.

*Ben Rm 5-4-89*

Initial

Date

3.

Initial

Date

4.

*Bruce - 5-3  
FYI -  
I guess send thru  
Bill to me for  
file - thanks  
Patty*

Initial

Date

REMARKS:

*FYI*

INFORMATION

Review & Return

Review & File

Initial & Forward

**RECEIVED**

MAY 3 1989

DER-BAQM

Files: PSD-FL-079

AC 54-43773

*Patty,  
we might want to send a  
copy to EPA, Region II: Wayne  
Aronson*

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

*Johnny Cole*

DATE

*05-02-89*

PHONE

PM  
1 Feb 1988  
Palatka, FL

File Copy



Georgia-Pacific Corporation Palatka Operations  
Southern Pulp & Paper Division

P.O. Box 919  
Palatka, Florida 32078-0919  
Telephone (904) 325-2001

January 28, 1988

DER

FEB 2, 1988

BAQM

Mr. Bruce Mitchell  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Bruce;

Please find enclosed a copy of the letter we received which extended the expiration dates for permits AC 54-43773, AC 54-43791, and AC 54-43795. If you need additional information please call me.

Sincerely,

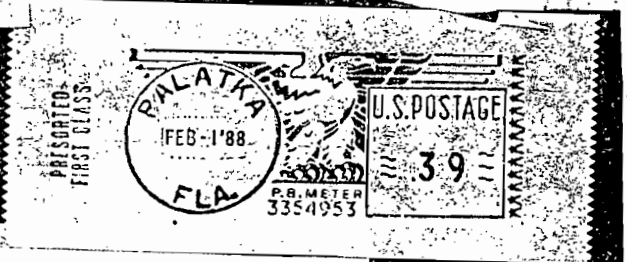
Vernon L. Adams  
Supervisor of  
Environmental Affairs

cc: W. L. Baxter

Copied: Mike Bailey }  
CHF/BT } 22-88 (M)

2-2-88  
FUI  
(M)

2-2-88  
Mike:  
Should I copy  
anyone else?  
(u)



# Georgia-Pacific



Palatka Operations  
Southern Pulp & Paper Division  
P.O. Box 919  
Palatka, FL 32078-0919

VERNON L. ADAMS

MR. BRUCE MITCHELL  
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

November 21, 1985

cc: W.L. Baxter  
W.R. Wilson  
E. Schmidt  
Air File  
Air Permit File

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon L. Adams  
Supervisor of Environmental Affairs  
Georgia-Pacific Corporation  
Post Office Box 919  
Palatka, Florida 32077

DER  
FEB 2, 1988  
BAQM

Dear Mr. Adams:

Re: Extension of the Expiration Date for AC 54-43773,  
AC 54-43791 and AC 54-43795

The bureau is in receipt of your request to extend the expiration date of the above referenced construction permits issued November 2, 1981, and are to expire December 31, 1985. The request is acceptable and the following condition is changed:

Expiration Date:

From: December 31, 1985  
To: July 31, 1989

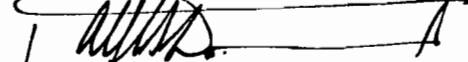
Attachment to be incorporated is:

- ° AC 54-43773  
10. Mr. Vernon L. Adams' letter dated November 12, 1985.
- ° AC 54-43791 and AC 54-43795  
9. Mr. Vernon L. Adams' letter dated November 12, 1985.

November 21, 1985  
Page Two

This letter and attachment shall be attached to each of your construction permits, No. AC 54-43773, -43791 and -43795, and shall become a part of that permit.

Sincerely,



Victoria J. Tschinkel  
Secretary

VJT/p

cc: W. R. Wilson  
Johnny Cole

Georgia-Pacific Corporation

Hudson Paper Corp.  
A wholly-owned subsidiary

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

November 12, 1985

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

DER  
FEB 2, 1988  
BAQM

Dear Clair:

Georgia-Pacific hereby requests an extension of construction permits, numbers AC 54-43773, AC 54-43791 and AC 54-43795, all of which expire on December 31, 1985. These permits are for the construction of a new lime kiln, recovery boiler and combination boiler. The receipt of our PSD permit from EPA in December of 1984, combined with a subsequent appeal of this permit which was resolved in October of 1985, has made it impossible to construct these sources prior to the expiration date of our current Florida permits. It is for these reasons that we respectfully request an extension of these permits until July 31, 1989. This period is requested in order to allow time to begin construction, complete construction and complete the compliance testing of these units.

If you have any questions, please contact me at (904) 325-2001.

Sincerely,



Vernon L. Adams  
Supervisor of Environmental Affairs

/de

cc: W. L. Baxter-Palatka  
J. Cole - FDER-Jax  
W. R. Wilson-Palatka  
D. Hodges - Atlanta 11  
E. Schmidt- Atlanta 09

DER

NOV 18 1985

BAQM





**Georgia-Pacific Corporation** 133 Peachtree Street, N.E.  
 P.O. Box 105605  
 Atlanta, Georgia 30348  
 (404) 521-4000

DER

July 16, 1984

JUL 23 1984

BAQM

State of Florida  
 Department of Environmental Regulation  
 Bureau of Air Quality  
 2600 Blair Stone Road  
 Tallahassee, FL 32301

Gentlemen:

Effective July 16, 1984, the facilities listed below, which had been part of St. Regis Corporation became part of Georgia-Pacific Corporation which is located at 133 Peachtree Street, N.E., Atlanta, Georgia 30303. Please transfer the following permits to the new owner and direct all correspondence to the plant address under the name Georgia-Pacific Corporation.

Your acknowledgement of this request at the earliest convenience would be appreciated. Should you have any questions regarding this matter, please feel free to contact me at 404/521-4645.

Facility Location

Permit Number

Mr. Charles Shaver  
 400 State Road 70 West  
 Lake Placid, FL 33852

AO28-54661  
 AO28-54664

Mr. Norbert Lechwar  
 P. O. Box 18016  
 659 Eastport Rd  
 Jacksonville, FL 32301

AO16-18728  
 AC16-74511

Very truly yours,

Eric J. Schmidt  
 Senior Environmental Engineer

EJS:faj

cc: G. F. McCaig  
 R. A. Horder  
 Charles Shaver  
 Norbert Lechwar

8/7/84

Sent } NE Dist. - Doug Dutton / John Brown  
 Copies to } BES - Ferry Woosley  
 SE Fla Dist - Roy Duke / Tom Tittle  
 West Palm local Program - Gene Sacco

RBW

Clair Fancy

November 16, 1983

CERTIFIED MAIL - RECEIPT REQUESTED

Mr. Vernon L. Adams  
Supervisor of Environmental Affairs  
Georgia-Pacific Corporation  
Post Office Box 919  
Palatka, Florida 32077

Re: Extension of the Expiration Date for AC 54-43773

Dear Mr. Adams:

The bureau is in receipt of your request to extend the expiration date of the above referenced construction permit issued November 2, 1981, and is to expire December 31, 1983. The request is acceptable and the following condition is changed:

Expiration Date:

From: December 31, 1983  
To: December 31, 1985

Attachment to be incorporated is:

9. Mr. Vernon L. Adams' letter dated March 9, 1983.

This letter and attachment shall be attached to your construction permit, No. AC 54-43773, and shall become a part of that permit.

Sincerely,

/s/Victoria J. Tschinkel  
Victoria J. Tschinkel  
Secretary

VJT/s

cc: R. C. Sherwood, Georgia-Pacific Corporation  
D. A. Buff, Environmental Science and Engineering, Inc.

P 408 530 355

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

|   |    |
|---|----|
| Sent to<br><b>Vernon L. Adams</b>                             |    |
| Street and No.  |    |
| P.O., State and ZIP Code                                      |    |
| Postage   | \$ |
| Certified Fee   |    |
| Special Delivery Fee  |    |
| Restricted Delivery Fee                                       |    |
| Return Receipt Showing to whom and Date Delivered             |    |
| Return Receipt Showing to whom, Date, and Address of Delivery |    |
| TOTAL Postage and Fees  | \$ |
| Postmark or Date<br><b>11/18/83</b>                           |    |

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered.....
- Show to whom, date and address of delivery.....
- RESTRICTED DELIVERY Show to whom and date delivered.....
- RESTRICTED DELIVERY Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
Mr. Vernon L. Adams  
Georgia-Pacific  
P. O. Box 919  
Palatka, FL 32077

3. ARTICLE DESCRIPTION:  
REGISTERED NO. CERTIFIED NO. INSURED NO.  
P408530355 B

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE:  Addressee  Authorized agent  
*Johnny B. Hill*

4. DATE OF DELIVERY: NOV 22 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK: PALATKA NOV 22 1983

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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

**RECEIVED**

NOV 17 1983

TO: Victoria J. Tschinkel  
FROM: Clair Fancy *Clair Fancy*

Office of the Secretary

DATE: November 16, 1983

SUBJ: Approval and signature of a modification to extend the expiration date of the construction permit, No. AC 54-43773, for Georgia-Pacific Corporation, issued November 2, 1981.

Enclosed is a modification to the referenced construction permit and the bureau recommends approval.

CF/s

attachment



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

March 9, 1983

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

DER  
MAR 11 1983  
BAQM

Dear Clair:

In August of 1982 we requested an extension of construction permit No. AC54-43773 which expires in December 1983 for Georgia-Pacific's No. 5 Combination Boiler. Your office suggested that we should re-submit this request in March of 1983. We again request the extension of construction permit No. AC54-43773 through December of 1985. The situation described in our August 24th letter still exists.

If I can be of any assistance, please contact me.

Sincerely,

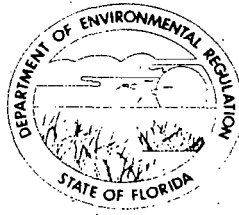
Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg  
Copy of 8/24/82 Ltr. Enclosed

cc D. A. Buff - Environ. Science & Engr. - Gainesville  
D. A. Martinez  
R. C. Sherwood

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

September 27, 1982

Mr. Vernon L. Adams  
Supervisor of Environmental Affairs  
Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

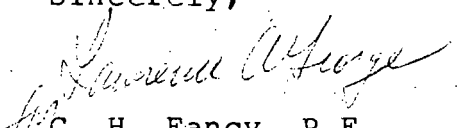
Re: Expiration Date Extension Request of Construction Permit  
No. AC 54-43773: No. 5 Combination Boiler

Dear Mr. Adams:

The Bureau is in receipt of your request for the extension of the expiration date of the referenced construction permit. After review of this request, the Bureau recommends that the request be resubmitted approximately 9 months (April, 1983) before the referenced permit expires, December 31, 1983.

If there are any questions, please call me at (904) 488-1344 or write to me at the above address.

Sincerely,

  
C. H. Fancy, P.E.  
Deputy Bureau Chief  
Bureau of Air Quality  
Management

CHF/RBM/bjm

Enclosure

cc: John Ketteringham  
Martha Harrell Hall



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

RECEIVED

August 24, 1982

SEP 7 1982

DER

AUG 20 1982

BAOM

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

Dept. of Environmental Regulation  
Office of General Counsel

Dear Clair:

The current construction permit No. AC54-43773 for Georgia-Pacific's No. 5 Combination Boiler expires in December of 1983. It is our intent to burn peat harvested from within the State of Florida as the main fuel in this unit. We have met delays in obtaining the required environmental permits to harvest the peat and we wish to delay construction of this boiler at this time. We hereby request an extension of this construction permit through December 1985.

If you have any comments or questions please contact me at 904/325-2001.

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

TO (NAME, OFFICE, LOCATION)

INITIAL

DATE

1

*Chas. Farny*

INITIAL

DATE

2

*Bill - please have* DER

INITIAL

DATE

3

*letter drafted yesterday* SEP 08 1982  
*these permits as requested*

INITIAL

DATE

REMARKS

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPLY

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

*I have no problems with extended either one. I would like to know why G-P is asking so early, though. (P.S. Talked to district lawyer for Jacksonville. G-P has been unable to get dredge & fill permit to mine peat. They are now trying to get approval as a pilot project.)*

FROM

*Marti Hall*

DATE

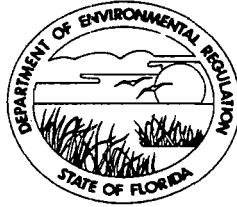
*9/8*

PHONE



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

MEMORANDUM

TO: Georgia-Pacific Corporation File  
FROM: Vernon Adams/David Buff  
DATE: October 27, 1981  
SUBJ: Correction to Construction Permit: AC 54-43791

Please note the following corrections and changes in the construction permit package.

In "Specific Condition No. 7", the "Maximum Allowable Emissions" for TRS and SO<sub>2</sub> were transposed incorrectly. The correction should read:

| <u>Pollutant</u> | <u>Maximum Allowable Emissions</u><br>(lbs./hr.) |
|------------------|--|
| TRS              | 5.2  |

ESE and Georgia-Pacific Corporation claim that the "EPA declared BACT for SO<sub>2</sub> of 50 ppm" was transposed incorrectly and the correct limit should have been "150 ppm". Checking with EPA, the limit of 150 ppm is the correct value. Therefore, the corrected "Maximum Allowable Emissions" is:

| <u>Pollutant</u> | <u>Emission Limitation</u>      | <u>Maximum Allowable Emissions</u> |
|------------------|---------------------------------|------------------------------------|
| SO <sub>2</sub>  | 150 ppm, corrected to 8% oxygen | (lbs./hr.)<br>293.88               |

If there are any questions, please call me at 904/488-1344.

Sincerely,

A handwritten signature in cursive script that reads "R. Bruce Mitchell".

R. Bruce Mitchell  
Engineer, III, BAQM-CAPS

cc: Vernon Adams, Georgia-Pacific  
Johnny Cole, St. Johns River District  
David Buff, Env. Science and Engineering

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

**INTEROFFICE MEMORANDUM**

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

TO: Georgia-Pacific Corporation Construction Permit Package  
FROM: Comments from Georgia-Pacific/ESE on October 19, 1981  
DATE: October 27, 1981  
SUBJ: BACT and Applicant SO<sub>2</sub> Emission Rate Change

Enclosed is the change of the SO<sub>2</sub> "Projected Actual Emission RATE" due to the BACT and application emission rate change and should have accompanied the October 27, 1981 letter and contents.

Please call me if there are any questions.

Sincerely,



R. Bruce Mitchell  
Central Air Permitting  
Bureau of Air Quality Management

cc: Vernon Adams, Georgia-Pacific Corporation  
Johnny Cole, St. Johns River Subdistrict  
David Buff, Environmental Science and Engineering

RBM:caa

$$\begin{array}{r} 87.60 \\ 97.5 \\ \hline 6032.0 \end{array}$$

10/26/81  
@ 1600+

From: Claire Fancy  
Via: Vernon Adams

AP42 for direct contact evaporator  
That is where 250 come from

non-direct is there's 5 Vernon Adams  
thinks 150 is tough as is.

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



**BOB GRAHAM**  
GOVERNOR  
**VICTORIA J. TSCHINKEL**  
SECRETARY

MEMORANDUM

TO: Georgia-Pacific Corporation File  
FROM: Bruce Mitchell/Vernon Adams  
DATE: October 20, 1981  
SUBJ: Correction to the Construction Permits:  
AC 54-43773 - Combination Boiler  
AC 54-43791 - Recovery Boiler

Please note the changes made to the construction permits for the "combination boiler" and "recovery boiler". Insert the corrected pages to reflect the correct steam temperatures. On pages "3 of 4", No. 4 Specific Condition, the correct steam temperature is 900° F.

If there are any questions, please call me at 904/488-1344.

Sincerely,

R. Bruce Mitchell  
Engineer III, BAQM-CAPS

cc: Vernon Adams, Georgia-Pacific  
Johnny Cole, St. Johns River District  
David Buff, Env. Science and Engineering

PERMIT NO.: AC 54-43773  
 APPLICANT: Georgia-Pacific Corporation

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum steam generation will be 700,000 pounds per hour at 900°F.
5. Maximum bark consumption will be 254,965 pounds per hour with a maximum heat input of  $1083.6 \times 10^6$  Btu per hour.
6. Maximum peat consumption will be 217,869 pounds per hour with a maximum heat input of  $1005.9 \times 10^6$  Btu per hour.
7. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, and emergency. Maximum sulfur content is 2.5%. Maximum consumption will be 40 barrels per hour with a maximum heat input of  $250 \times 10^6$  Btu per hour.
8. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limitation</u>  | <u>Maximum Allowable Emissions</u><br>(lbs./hr.) |             |
|--------------------|---|--|-------------|
|                    |   | <u>Bark</u>                                      | <u>Peat</u> |
| Particulate Matter | 0.10 lbs./ $10^6$ Btu heat input  | 108.36   | 100.59      |
| SO <sub>2</sub>    | 0.65 lbs./ $10^6$ Btu heat input  | 704.34   | 653.84      |
| NO <sub>x</sub>    | 0.30 lbs./ $10^6$ Btu heat input  | 325.08   | 301.77      |
| VE                 | 20% maximum Opacity (except for one 6-minute period per hour of not more than 27% Opacity). |  |             |

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the sources.
3. Operation time will be 8,760 hours per year.
4. Maximum steam generation will be 607,500 pounds per hour at 900°F. Maximum black liquor, at 65% solids, consumption will be 230,679 pounds per hour with a maximum heat input of  $990 \times 10^6$  Btu per hour, yielding 63,000 pounds per hour of smelt.
5. Maximum total smelt utilization in the smelt dissolving tanks is 63,000 pounds per hour.
6. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, emergency and system checking. Maximum sulfur content is 2.5%. Maximum consumption will be 23.8 barrels per hour with a maximum heat input of  $146 \times 10^6$  Btu per hour.
7. Maximum allowable emissions are:

Recovery Boiler No. 5:

| <u>Pollutant</u>              | <u>Emission Limitation</u>                                     | <u>Maximum Allowable Emission:</u><br><u>(lbs./hr.)</u> |
|-------------------------------|--|---|
| Particulate Matter            | 0.044 grains/DSCF<br>corrected to 8% oxygen                    | 75.4  |
| Total Reduced<br>Sulfur (TRS) | 5 ppm. by volume on a<br>dry basis, corrected to<br>8% oxygen. | 97.96   |
| SO <sub>2</sub>               | 50 ppm   | 5.2   |
| Visible Emissions             | 30% maximum Opacity  |   |



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

October 19, 1981

*Bill*  
Mr. Clair Fancy  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Dear Clair:

I asked Dave Buff of ESE to review and comment on the BACT determination and proposed permit package for our mill. He had several comments which we feel are pertinent, so I am sending you a copy of his review. Please modify the packet and the permits accordingly.

If you have any questions or if I can be of further service, please call.

Sincerely,

Vernon L. Adams  
Supervisor of Environmental Affairs

:la

Attachment

cc: J. L. Cole, DER - Jacksonville  
R. B. Mitchell, DER - Tallahassee  
Bill Thomas, DER - Tallahassee  
R. C. Sherwood, G-P - Palatka





October 13, 1981  
ESE No. 81-128-100

Mr. Vernon Adams  
Environmental Engineer  
Georgia-Pacific Corporation  
P.O. Box 919  
Palatka, Florida 32077

Dear Vernon:

I have reviewed the DER's Technical Evaluation and Preliminary Determination as well as the draft construction permits for G-P's proposed expansion at the Palatka mill. I offer the following comments on the determinations.

Technical Evaluation and Preliminary Determination

Under item I.C., second to last paragraph - the sentence "PM emissions will be controlled with wet scrubbers." apparently applies to the smelt dissolving tanks, although it is not stated as such.

Under item II., the potential uncontrolled emission rate for TRS should be 3107 tons per year, and not the 3,197 stated therein.

Under item III.A., the emission limitation for SO<sub>2</sub> on the recovery boiler appears to be too low. The limit of 50 ppm is reflected throughout the document, including the BACT determination. This limit apparently was derived from page 6 of 10 of the Recovery Boiler No. 5 permit application, Item VI.B., wherein it is stated that EPA has declared BACT to be 50 ppm for SO<sub>2</sub>. This 50 ppm appears to be a typographical error on our part, since review of the EPA BACT determination attached to the application indicate the lowest BACT limit declared to be 150 ppm. The 50 ppm limit results in an emission limitation of 97.96 lb/hr, whereas a 150 ppm limit would allow 293.88 lb/hr. The emission rate contained in the permit application, and included in all SO<sub>2</sub> modeling for the Palatka mill, was 250 lb/hr, based upon the AP-42 factor for recovery boilers. It is ESE's belief that the 50 ppm (97.96) value is too low and probably cannot be met by the new boiler, and the limit should be revised to either 150 ppm (293.88 lb/hr) or 250 lb/hr.

BACT Determination

Comments provided above concerning SO<sub>2</sub> limit on recovery boiler also apply here.

Under "Justification for DER Determination", it is stated that an NSPS exists for SO<sub>2</sub> on the recovery boiler, and this limit was determined to be BACT. To my knowledge, NSPS for SO<sub>2</sub> does not exist for the recovery boiler.

ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

Mr. Vernon Adams  
October 13, 1981  
Page 2

Draft Construction Permits

Concerning the Recovery Boiler No. 5 permit, the same comments as above apply to the 50 ppm SO<sub>2</sub> emission limitation. Also the maximum allowable emissions (lb/hr) for TRS and SO<sub>2</sub> seem to have been transposed.

I hope these comments prove useful to you in pursuing final permit issuance.

Sincerely,

*David A. Buff*

David A. Buff, P.E.  
Senior Engineer  
Project Operations

DAB/sn



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

October 9, 1981

Mr. Bill Thomas  
Bureau of Air Quality  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301



Dear Bill:

In reviewing the proposed construction permits for our expansion, I noticed steam temperatures of 350° F on the Combination Boiler and 393° F on the Recovery Boiler. These numbers were evidently transposed from the stack gas exit temperatures.

The correct steam temperature is 900° F for each of these units. Please make this change on the permits.

If I can be of further service, please call.

Sincerely,

Vernon L. Adams  
Supervisor of Environmental Affairs

/ct

cc: Mr. R. Sherwood  
Mr. D. Buff, ESE, Gainesville

PERMIT NO.: AC 54-43773  
 APPLICANT: Georgia-Pacific Corporation

SPECIFIC CONDITIONS:

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum steam generation will be 700,000 pounds per hour at 900°F.
5. Maximum bark consumption will be 254,965 pounds per hour with a maximum heat input of  $1083.6 \times 10^6$  Btu per hour.
6. Maximum peat consumption will be 217,869 pounds per hour with a maximum heat input of  $1005.9 \times 10^6$  Btu per hour.
7. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, and emergency. Maximum sulfur content is 2.5%. Maximum consumption will be 40 barrels per hour with a maximum heat input of  $250 \times 10^6$  Btu per hour.
8. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limitation</u>  | <u>Maximum Allowable Emissions (lbs./hr.)</u> |             |
|--------------------|---|---|-------------|
|                    |   | <u>Bark</u>                                   | <u>Peat</u> |
| Particulate Matter | 0.10 lbs./ $10^6$ Btu heat input  | 108.36  | 100.59      |
| SO <sub>2</sub>    | 0.65 lbs./ $10^6$ Btu heat input  | 704.34  | 653.84      |
| NO <sub>x</sub>    | 0.30 lbs./ $10^6$ Btu heat input  | 325.08  | 301.77      |
| VE                 | 20% maximum Opacity (except for one 6-minute period per hour of not more than 27% Opacity). |   |             |

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the sources.
3. Operation time will be 8,760 hours per year.
4. Maximum steam generation will be 607,500 pounds per hour at 900°F. Maximum black liquor, at 65% solids, consumption will be 230,679 pounds per hour with a maximum heat input of  $990 \times 10^6$  Btu per hour, yielding 63,000 pounds per hour of smelt.
5. Maximum total smelt utilization in the smelt dissolving tanks is 63,000 pounds per hour.
6. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, emergency and system checking. Maximum sulfur content is 2.5%. Maximum consumption will be 23.8 barrels per hour with a maximum heat input of  $146 \times 10^6$  Btu per hour.
7. Maximum allowable emissions are:

Recovery Boiler No. 5:

| <u>Pollutant</u>              | <u>Emission Limitation</u>                                     | <u>Maximum Allowable Emissions</u><br>(lbs./hr.) |
|-------------------------------|--|--|
| Particulate Matter            | 0.044 grains/DSCF<br>corrected to 8% oxygen                    | 75.4   |
| Total Reduced<br>Sulfur (TRS) | 5 ppm. by volume on a<br>dry basis, corrected to<br>8% oxygen. | 97.96  |
| SO <sub>2</sub>               | 50 ppm   | 5.2  |
| Visible Emissions             | 30% maximum Opacity  |  |

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

MEMORANDUM

TO: Georgia-Pacific Corporation File  
FROM: Bruce Mitchell *BM*  
DATE: October 7, 1981  
SUBJ: Correction to the Construction Permit Package

Insert/replace the enclosed pages in the appropriate section of the package. The correction was:

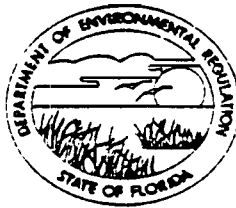
from: 1. Application to Construct Air Pollution Sources,  
DER, Form 17-1.22(16)  
to: 1. Application to Construct Air Pollution Sources,  
DER, Form 17-1.122(16).

If there are any questions please call me at (904) 488-1344.

cc: Vernon Adams, Georgia Pacific  
Johnny Cole, St. Johns River District  
David Buff, Env. Science and Engineering

BM:caa

TWIN TOWERS OFFICE BUILDING  
2500 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR

Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43791

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Recovery  
Boiler No. 5 and two  
Smelt Dissolving Tanks  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a recovery boiler to produce a maximum of 607,500 lbs./hr. of steam, equipped with an electrostatic precipitator. In addition, two smelt dissolving tanks will be constructed, equipped with a wet scrubber each. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachment B).
4. Stack sampling drawing.

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43773

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Combination  
Boiler No. 5 (fired with  
bark and/or peat).

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a combination boiler to produce a maximum of 700,000 lbs./hr. of steam, fired with bark and/or peat, equipped with an electrostatic precipitator, and will use No. 6 Fuel Oil, (maximum 2.5% Sulfur content, not to exceed 40 barrels/hr. - maximum  $250 \times 10^6$  Btu/hr. heat input), as an auxiliary fuel for startup, shutdown, and emergency only. Permitted hours of operation will be 8760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122 (16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachments B).
4. Stack sampling drawing.



TWIN TOWERS OFFICE BUILDING  
2500 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43795

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Lime Kiln  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a lime kiln with a maximum capacity of 320 tons per day, equipped with a high energy venturi scrubber. No. 6 Fuel Oil maximum consumption will be 16.6 barrels per hour with a maximum heat input of  $102 \times 10^6$  Btu per hour. Maximum sulfur content is 2.5%. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.I22(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachments B).
4. Stack sampling drawing.

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

TO: Georgia-Pacific Corporation File  
SUBJ: Comments/Amendments to Construction Permit Package  
FROM: Bruce Mitchell<sup>BM</sup>/Vernon Adams  
DATE: October 1, 1981

Corrections were made in the "Process" description in the Technical Evaluation and Preliminary Determination under I.C.: Process and Controls. Please insert this page in place of the original.

If there are any questions please call me at (904) 488-1344.

BM/VA/bjm

cc: Vernon Adams  
Georgia-Pacific

Johnny Cole  
St. Johns River Subdistrict

David Buff, ESE

It is economically necessary to recover both the inorganic cooking chemicals and the heat content of the spent "black liquor," which is separated from the cooked pulp. Recovery is accomplished by first concentrating the liquor to a level that will support combustion and then feeding it to a furnace where burning and chemical recovery take place.

Initial concentration of the weak black liquor, which contains about 15 percent solids, occurs in the multiple-effect evaporator. Here process steam is passed countercurrent to the liquor in a series of evaporator tubes that increase the solids content to 65 percent. The black liquor concentration is then sprayed into the nondirect contact recovery furnace where the organic content supports combustion. The inorganic compounds fall to the bottom of the furnace and are discharged to the smelt dissolving tank to form a solution called "green liquor". The green liquor is then conveyed to a causticizer where slaked lime (calcium hydroxide) is added to convert the solution back to white liquor, which can be reused in subsequent cooks. Residual lime sludge from the causticizer can be recycled after being dewatered and calcined in the hot lime kiln.

The combination boiler will be serviced with an electrostatic precipitator (ESP) to remove particulate matter (PM). The expected efficiency of this control device is 99+%.

The non-direct contact recovery boiler's PM emissions will be controlled with an ESP with an expected collection efficiency of 99%. PM emissions will be controlled with wet scrubbers. Expected collection efficiency is 98%.

The lime kiln's PM emissions will be controlled with a high energy venturi scrubber. Expected collection efficiency is 99.7%.



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

MEMORANDUM

TO: Roger C. Sherwood, Georgia-Pacific Corporation  
David Buff, ESE Consultants  
Johnny Cole, FDER, St. Johns River Subdistrict

FROM: C. H. *Bill Thomas* Bureau of Air Quality Management

DATE: September 29, 1981

SUBJ: Preliminary Determination-Georgia-Pacific Corpora-  
tion, Proposed Constructions that will Double  
Production Capacity

Attached is one copy of the applications, Technical Evaluation and Preliminary Determination, BACT determinations and proposed permits to construct a recovery boiler and associated smelt tanks (2), lime kiln and combination bark/peat fired boiler at the Georgia-Pacific Kraft Pulp Mill near Palatka, Putnam County, Florida.

Please submit any comments which you wish to have considered concerning this section, in writing, to Bill Thomas of the Bureau of Air Quality Management.

CF/bjm

Attachment

Public Notice

The Department intends to issue permits to Georgia-Pacific Corporation for the construction of a recovery boiler, two smelt tanks, a lime kiln and a combination steam generator fired with bark and/or peat to modify their existing kraft pulp mill in Palatka, Florida. The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code (FAC).

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

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

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.15, FAC, within fourteen (14) days of the date of this notice with:

Ms. Mary Clark  
Office of General Counsel  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

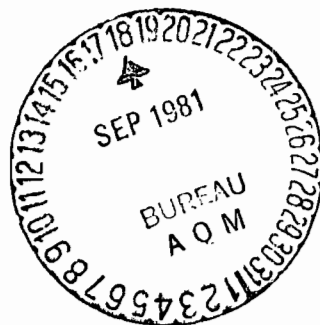
PROPOSED AGENCY ACTION

The Florida Department of Environmental Regulation (DER) has received applications from and intends to issue Construction permits to Georgia-Pacific Corporation for the modification of a Kraft Pulp Mill, located at their facility near Palatka, Putnam County, Florida. A determination of Best Available Control Technology was required. Copies of the applications, BACT Determination, Technical Evaluation, and Departmental Intent are available for inspection at the following offices:

FDER, St. Johns River Subdistrict  
Office  
3426 Bills Road  
Jacksonville, Florida 32217

DER Bureau of Air Qual. Mgmt.  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Comments on this action shall be submitted in writing to C. H. Fancy of the Tallahassee office, within 30 days of this notice.



TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



*F-89*

BOB GRAHAM  
GOVERNOR  
JACOB D. VARN  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Palatka Daily News  
1825 St. Johns Ave  
Palatka FL 32077

9/18/81

Dear Sir:

We are forwarding to you a legal/~~classified~~ advertisement to be published:

9/28/81 (only)

Subject: Public Notice - Proposed Action

To ensure prompt payment, please send an invoice and proof of publication for legal ads to the address below:

Department of Environmental Regulation  
PURCHASING OFFICE  
2600 Blair Stone Road  
Tallahassee, FL 32301

If you have any questions, please contact us at 904/488/0870.

Sincerely,

William H. Wallace  
Purchasing Office

Enclosure: (1)



Technical Evaluation  
and  
Preliminary Determination

Georgia-Pacific Corporation  
Palatka, Florida

Application Numbers:

AC 54-43773  
AC 54-43791  
AC 54-43795

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

## I. PROJECT DESCRIPTION

A. Applicant  
Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

### B. Project and Location

The applicant proposes to increase unbleached pulp production by 1200 tons per day at their existing kraft pulp mill in Putnam County. This modification will be accomplished by the construction of a recovery boiler, two smelt tanks, a lime kiln, and a combination boiler. The proposed combination boiler will be fired with bark and/or peat to produce a maximum 700,000 lbs./hr. of steam while the recovery boiler will burn black liquor solids to produce a maximum 607,500 lbs./hr. of steam. The combination boiler will use No. 6 Fuel Oil as a supplementary fuel for startup, shutdown, emergencies, and system checking, with a consumption rate not to exceed 40 barrels per hour and a maximum heat input of 250 million Btu per hour. The 320 ton/day lime kiln will be fired with No. 6 Fuel Oil with a consumption rate not to exceed 16.6 barrels per hour and a maximum heat input of 102 million Btu per hour. The sources are expected to operate continuously, a total of 8760 hours per year.

The plant location is north of S.R. 216 and west of U.S. 17 in Palatka, Florida. UTM coordinates are 434.0 km. East and 3283.4 km. North.

### C. Process and Controls

The kraft process involves the cooking of wood chips under pressure in the presence of a cooking liquor in either a batch or a continuous digester. The cooking liquor, or "white liquor" consisting of an aqueous solution of sodium sulfide and sodium hydroxide, dissolves the lignin that binds the cellulose fibers together.

When cooking is completed, the contents of the digester are forced into the blow tank. Here the major portion of the spent cooking liquor, which contains the dissolved lignin, is drained, and the pulp enters the initial stage of washing. From the blow tank the pulp passes through the knotter where unreacted chunks of wood are removed. The pulp is then washed and, in some mills, bleached before being pressed and dried into the finished product.

It is economically necessary to recover both the inorganic cooking chemicals and the heat content of the spent "black liquor," which is separated from the cooked pulp. Recovery is accomplished by first concentrating the liquor to a level that will support combustion and then feeding it to a furnace where burning and chemical recovery take place.

Initial concentration of the weak black liquor, which contains about 15 percent solids, occurs in the multiple-effect evaporator. Here process steam is passed countercurrent to the liquor in a series of evaporator tubes that increase the solids content to 40 to 55 percent. Further concentration is then effected in the <sup>65</sup>direct contact evaporator. This is generally a scrubbing device (a cyclonic or venturi scrubber or a cascade evaporator) in which hot combustion gases from the recovery furnace mix with the incoming black liquor to raise its solids content to 55 to 70 percent. The black liquor concentration is then sprayed into the nondirect contact recovery furnace where the organic content supports combustion. The inorganic compounds fall to the bottom of the furnace and are discharged to the smelt dissolving tank to form a solution called "green liquor". The green liquor is then conveyed to a causticizer where slaked lime (calcium hydroxide) is added to convert the solution back to white liquor, which can be reused in subsequent cooks. Residual lime sludge from the causticizer can be recycled after being dewatered and calcined in the hot lime kiln.

The combination boiler will be serviced with an electrostatic precipitator (ESP) to remove particulate matter (PM). The expected efficiency of this control device is 99+%.

The non-direct contact recovery boiler's PM emissions will be controlled with an ESP with an expected collection efficiency of 99%. PM emissions will be controlled with wet scrubbers. Expected collection efficiency is 98%.

The lime kiln's PM emissions will be controlled with a high energy venturi scrubber. Expected collection efficiency is 99.7%.

## II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code (FAC).

The proposed project is located in Putnam County, which is designated attainment area for all criteria pollutants. The mill is more than 50 km. from any particulate matter (PM) or SO<sub>2</sub> nonattainment area and more than 100 km. from any Class I area.

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

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

Since the proposed project is a physical change to an existing major emitting facility which would result in an increase in potential emissions of either PM or SO<sub>2</sub> over the baseline, it constitutes a modification subject to review under State prevention of significant deterioration (PSD) regulations (17-2.04(6), FAC). (In this case, potential emissions of both PM and SO<sub>2</sub> will increase, but only SO<sub>2</sub> concentrations will increase over the baseline. The post-1974 shut-down of lime kilns 1-3 and recovery boilers 1-3 at the mill have expanded the PSD increment such that PM emissions from the proposed project will not result in concentrations over the baseline). PSD review consists of a determination of best available control technology (BACT) for all pollutants emitted and an air quality impact analysis to demonstrate that the project would not cause or contribute to a violation of any ambient air quality standard or PSD increment.

The proposed combination steam generator fuel is bark and/or peat. Peat and lignite form a transition layer between biomasses and coals (Tappi-August-1981), therefore peat, being neither a fossil-fuel nor a carbonaceous fuel as defined in 17-2. FAC, is presently considered an unclassified fuel. Bark, however, is defined as "wood residue" in NSPS, Subpart D, subsection 60.41 (e), and as a "carbonaceous fuel" in 17-2.02 (21) FAC.

BACT has been established on bark fired steam generators for particulate matter (PM) and that limit is 0.1 lbs. per million Btu heat input. The technology to fire peat is not unknown and the Department believes that manufacturers of emission control devices now have the expertise to build equipment for the level of particulate control required for this installation and in limiting peat PM emissions to 0.1 lbs. per million Btu heat input as BACT.

In addition, back up fuel will be No. 6 Fuel Oil, a fossil fuel, and shall have a maximum heat input of 250 million Btu per hour. Since the minimum level to trigger NSPS, 40 CFR 60, Subpart D, for fossil fuel fired steam generators, or combinations of fossil fuel and wood residue (bark), is greater than 250 million Btu per hour heat input, 40 CFR 60, Subpart D does not apply as a mandatory limit. However, practical control levels do not experience a "step function" at exactly 250 million Btu per hour heat input, but would have a smooth transition through the large to small boiler size range based primarily on economics. Therefore, the Department has determined that through the BACT process the limits of 40 CFR 60, Subpart D do furnish a valuable and valid guide. Consequently, emission limits for SO<sub>2</sub>, NO<sub>x</sub>, and visible emissions (VE) will be imposed in accordance with the BACT determination for the combination steam generator.

Although not yet adopted at the State level, the federal NSPS for kraft pulp mills (40 CFR 60.280, Subpart BB) will be considered in the BACT determination for PM and TRS emissions from the recovery boiler, smelt tanks, and lime kiln. Also, the emission limit for SO<sub>2</sub> for the recovery boiler has been declared by EPA as BACT for this class of source.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The allowable pollutant emissions from this facility, by source, will be:

| Emission Limiting Standard  |                 |  |   |             |
|-----------------------------|-----------------|--|---|-------------|
| Source                      | Pollutant       | Emission Limitation  | Plant Allowable Emissions<br>(Maximum lbs./hr.) |             |
| Combination<br>Boiler No. 5 |                 |  | <u>Bark</u>                                     | <u>Peat</u> |
|                             | Particulates    | 0.1 lb/10 <sup>6</sup> Btu<br>heat input   | 108.36  | 100.59      |
|                             | SO <sub>2</sub> | 0.65 lb/10 <sup>6</sup> Btu<br>heat input  | 704.34  | 653.84      |
|                             | NO <sub>x</sub> | 0.30 lb/10 <sup>6</sup> Btu<br>heat input  | 325.08  | 301.77      |
|                             | VE              | 20% maximum Opacity<br>(except for one 6-<br>minute period per<br>hour of not more<br>than 27% Opacity). |   |             |
| Recovery<br>Boiler No. 5    | Particulates    | 0.044 grains/DSCF<br>(corrected to 8%<br>oxygen)   | 75.4  |             |
|                             | SO <sub>2</sub> | 50 ppm   | 97.96   |             |
|                             | TRS             | 5 ppm by volume on<br>a dry basis (corrected<br>to 8% oxygen)  | 5.2   |             |
|                             | VE              | 35% maximum Opacity  |   |             |
| Smelt Tanks<br>No. 5        | Particulates    | 0.2 lb/ton black<br>liquor solids (dry<br>weight)  | 15.0 (Total)                                    |             |
|                             | TRS             | 0.0168 lb/ton black<br>liquor solids (dry weight)  | 1.26 (Total)                                    |             |

Emission Limiting Standard

| Source          | Pollutant    | Emission Limitation                                      | Plant Allowable Emissions<br>(Maximum lbs./hr.) |
|-----------------|--------------|--|---|
| Lime Kiln No. 5 | Particulates | 0.13 grains/DSCF<br>(corrected to 10% oxygen)            | 29.31   |
|                 | TRS          | 8 ppm by volume on a dry basis (corrected to 10% oxygen) | 1.09  |
|                 | VE           | 20% maximum Opacity                                      |   |

The permitted emissions are in compliance with all applicable requirements of Chapter 17-2 (FAC), referenced New Source Performance Standards (NSPS), and what has been determined to be BACT (see Attachment A).

## B. Air Quality Impact Analysis

The State PSD review for PM and SO<sub>2</sub> requires an air quality impact analysis which includes a PSD increment analysis and a Florida Ambient Air Quality Standards (FAAQS) analysis. The PSD increment and FAAQS analyses depend on air quality modeling carried out in accordance with FDER-approved methods.

Based on these required analyses, FDER has reasonable assurance that the Georgia-Pacific modification, as described in this permit and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or ambient air quality standard. A discussion of the required analyses follows.

### 1. Modeling Methodology

The Industrial Source Complex (ISC) model, an FDER and EPA-approved dispersion model, was used to determine the maximum predicted annual concentrations and to identify the worst-case short-term meteorological conditions which would affect emissions from Georgia-Pacific after the proposed modification is completed. The maximum short-term impacts were refined using the ISC model with a 0.1 kilometer spacing between receptor rings and only the days on which worst-case meteorological conditions occurred.

The surface meteorological data used in the model were National Weather Service data collected at Jacksonville, Florida, during the period 1970-74. Upper air meteorological data used in the model were collected during the same period at Waycross, Georgia.



## 2. Analysis of Existing Air Quality

Preconstruction ambient monitoring for total suspended particulate (TSP) and SO<sub>2</sub> is being conducted at the Georgia-Pacific site. Since the results of the monitoring program are not yet available, conservative background TSP concentrations of 40 ug/m<sup>3</sup>, annual average, and 80 ug/m<sup>3</sup>, 24-hour average, were assumed in the air quality impact analysis. Since all significant sources of SO<sub>2</sub> within 50 km of the mill were included in the modeling, a background concentration of 0 ug/m<sup>3</sup> was assumed for SO<sub>2</sub>.

## 3. PSD Increment Analysis

The Georgia-Pacific mill is located in an area where the Class II PSD increments apply. There is no Class I area within 100 km of the mill site.

In addition to the proposed modification, increment consumption is affected by the post-1974 shut down of lime kilns 1-3 and recovery boilers 1-3. In combination with these shut downs, the proposed modification will result in no increase in TSP concentrations over the baseline. As shown in the following table, the predicted maximum SO<sub>2</sub> increment consumption due to the shut downs and the proposed modification will not exceed allowable increments. The highest, second-highest short-term predicted concentrations are given in the table since five years of meteorological data were used in the modeling.

Maximum SO<sub>2</sub> Increment Consumption  
(ug/m<sup>3</sup>)

|  | <u>Averaging Time</u> |                |               |
|--|-----------------------|----------------|---------------|
|  | <u>3-hour</u>         | <u>24-hour</u> | <u>Annual</u> |
| Class II PSD Increment Consumed by Georgia-Pacific | 99                    | 15             | <5            |
| Allowable Class II Increment                       | 512                   | 91             | 20            |

#### 4. Ambient Air Quality Standards Analysis

State PSD regulations require the permit applicant to demonstrate that, given existing air quality in an area, a proposed emissions increase subject to PSD review will not cause or contribute to any violation of ambient air quality standards. As shown in the following table, predicted maximum ground-level TSP and SO<sub>2</sub> concentrations resulting from total mill emissions after the proposed modification will be below the FAAQS. The highest, second-highest, short-term predicted values are given in this table since five years of meteorological data were used in the modeling.

|                                      | <u>Predicted Concentration* (ug/m<sup>3</sup>)</u> |                       |                       |                |               |
|--------------------------------------|--|-----------------------|-----------------------|----------------|---------------|
|                                      | <u>3-hour</u>                                      | <u>24-hour</u>        | <u>Annual</u>         | <u>24-hour</u> | <u>Annual</u> |
|                                      | <u>SO<sub>2</sub></u>                              | <u>SO<sub>2</sub></u> | <u>SO<sub>2</sub></u> | <u>TSP</u>     | <u>TSP</u>    |
| Maximum<br>Georgia-Pacific<br>Impact | 410  | 116                   | 22                    | 108            | 44            |
| FAAQS                                | 1,300  | 260                   | 60                    | 150            | 66            |

\*Includes background TSP concentrations of 80 ug/m<sup>3</sup>, 24-hour average, and 40 ug/m<sup>3</sup>, annual average.

#### IV. Conclusions

FDER proposes a preliminary determination of approval with conditions for the construction of the proposed combination boiler, recovery boiler, two smelt tanks, and lime kiln by Georgia-Pacific Corporation. The determination is made on the basis of information contained in the application and in the additional information dated June 26, June 30, July 31, and August 25, 1981 (Attachments B).

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of Chapter 17-2 (FAC), NSPS, and what has been determined as BACT.

ATTACHMENT A

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

| For Routing To District Offices<br>And/Or To Other Than The Addressee |              |
|---|--------------|
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| To: _____   | Locn.: _____ |
| To: _____   | Locn.: _____ |
| From: _____   | Date: _____  |

TO: District, Subdistrict and Local Program Air Engineers  
FROM: Ed. Palagyi<sup>EP</sup>, BACT Coordinator  
DATE: July 15, 1981  
SUBJ: BACT as determined for Georgia - Pacific Corporation

Attached please find one copy of the BACT as determined by the Florida Department of Environmental Regulation for the subject applicant.

Should you have any questions regarding this BACT, please contact me at (904) 488-1344 or Suncom 278-1344.

EP:dav

Best Available Control Technology (BACT) Determination

Georgia-Pacific Corporation

Putnam County, Florida

July 13, 1981

The applicant plans to increase unbleached pulp production by 1200 tons per day at their existing facility located in Palatka, Florida. To accomplish this goal, a recovery boiler, two smelt tanks, a lime kiln, and a combination steam generator fired with bark and/or peat will be constructed. The steam generator will use No. 6 oil as a supplementary fuel with a consumption rate not be exceed 40 barrels per hour. The lime kiln will be fired with No. 6 fuel oil at a maximum heat input of 102 million Btu per hour. The sources are scheduled to operate continuously, a total of 8760 hours per year.

BACT Determination Requested by the Applicant:

| <u>Pollutant</u>                 | <u>Emission Limit</u>                       |
|----------------------------------|---|
| A. <u>Steam Generator No. 5:</u> |   |
| Particulates                     | 0.2 lb/million Btu input                    |
| SO <sub>2</sub>                  | 0.65 lb/million Btu input                   |
| NO <sub>x</sub> , VOC, CO        | Boiler design & proper operation            |
| B. <u>Recovery Boiler No. 5:</u> |   |
| Particulates                     | 0.044 grains/DSCF                           |
| TRS                              | 5 ppm dry basis as H <sub>2</sub> S         |
| SO <sub>2</sub>                  | Proper process control & wet scrubber       |
| C. <u>Smelt Tank Vents:</u>      |   |
| Particulates                     | 0.2 lb/ton black liquor solids (dry wt.)    |
| TRS                              | 0.0168 lb/ton black liquor solids (dry wt.) |
| SO <sub>2</sub>                  | Proper process control & wet scrubber       |
| D. <u>Lime Kiln No. 5:</u>       |   |
| Particulates                     | 0.13 grains/DSCF when burning liquid fuel   |
| TRS                              | 8 ppm by volume (dry basis)                 |
| Others                           | Proper kiln design & operation              |

Date of Receipt of a BACT Application:

June 2, 1981

Date of Publication in the Florida Administrative Weekly:

June 5, 1981

Review Group Members:

The BACT determination was made based on recommendations from Bruce Mitchell and John Svec, BAQM New Source Review Section; Steve Pace, Jacksonville Bio-Environmental Services; and Larry George, BAQM Air Modeling Section.

BACT Determination by DER:

A. 700,000 lb/hr Steam Generator No. 5:

| <u>Pollutant</u>  | <u>Emission Limit<br/>(lb/million Btu heat input)</u>   |
|-------------------|---|
| Particulates      | 0.10  |
| SO <sub>2</sub>   | 0.65  |
| NO <sub>x</sub>   | 0.30  |
| Visible Emissions | 20% maximum opacity<br>except for one six-<br>minute period per hour<br>of not more than 27%<br>opacity |

B. Black Liquor Recovery Boiler No. 5:

| <u>Pollutant</u>           | <u>Emission Limit</u>                                     |
|----------------------------|---|
| Particulates               | 0.044 grains/DSCF corrected<br>to 8 percent oxygen        |
| Total Reduced Sulfur (TRS) | 5 ppm by volume on a dry<br>basis, corrected to 8% oxygen |
| SO <sub>2</sub>            | 50 ppm  |
| Visible Emissions          | Maximum 35% opacity                                       |



C. Smelt Tank Vents:

| <u>Pollutant</u> | <u>Emission Limit</u>                             |
|------------------|---|
| Particulates     | 0.2 lb/ton black liquor solids<br>(dry weight)    |
| TRS              | 0.0168 lb/ton black liquor solids<br>(dry weight) |

D. Lime Kiln No. 5:

| <u>Pollutant</u>  | <u>Emission Limit</u>                                      |
|-------------------|--|
| Particulates      | 0.13 grains/DSCF corrected to<br>10% oxygen                |
| TRS               | 8 ppm by volume on a dry basis,<br>corrected to 10% oxygen |
| Visible Emissions | Maximum 20% opacity  |

Justification of DER Determination:

The applicant proposes to use peat as a fuel in the steam generator. The precursor of coal is peat, which is formed by bacterial and chemical action on biological debris. Subsequent actions of heat, pressure and other physical phenomena metamorphosed the peat to the various ranks of coal as we know them today. (Ref: Chemical Engineers Handbook, fifth edition). Peat is determined to be a solid fossil fuel in this determination.

The emissions limits determined as BACT for the combination steam generator for particulates, SO<sub>2</sub>, NO<sub>x</sub> and percent opacity are equal to, or more stringent than<sup>2</sup> the<sup>x</sup>New Source Performance Standards (NSPS), Subpart D. Carbon monoxide does not lend itself to exhaust gas removal techniques. The control of its formation by following the boiler design firing parameters is determined as BACT. The reference methods as provided under subsection 60.46 of the NSPS, Subpart D, shall be used to determine compliance.

The emission limits determined as BACT for the recovery furnace pollutants for particulates, total reduced sulfur (TRS), SO<sub>2</sub> and opacity are equal to NSPS, Subpart BB. The moisture content of the black liquor and the reducing atmosphere above the smelt bed tend to inhibit both flame temperature and oxygen levels in the combustion zone. This normally limits the concentration of NO<sub>x</sub> emitted. BACT for the control of NO<sub>x</sub> and CO is to maintain<sup>x</sup> furnace operation within range of the<sup>x</sup> design parameters.



# Steam / its generation and use

**Babcock & Wilcox**

161 East 42nd Street, New York, N.Y. 10017

212-637-6700

Atlanta, Ga.

404-939-6392

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Thirty-ninth edition

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*Library of Congress Catalog Card Number: 77-90791      Printed in the United States of America.*

Table 4. The countries in southwest Asia have, by far, most of the known reserves of petroleum with 45.2%. North Africa and Middle South Asia are next with 11.7% and 9.8%. The U.S.S.R. is fourth with 8.9%. North and Middle America, including Alaska and Canada, is sixth with 7.65%.

The Organization of Petroleum Exporting Countries (OPEC) is an international cartel that has gained dominance in the petroleum industry over the past ten years. Table 5 shows how the OPEC nations dominate world oil production. Table 6 shows how their revenues have grown in the years 1971 through 1974. It also gives the member nations of OPEC.

**Table 2**  
Solid fossil fuel resources by continents and nations  
with major resources, 1974  
(Million metric tons)

| Country or<br>Continent | Economic Reserves |           | Total<br>Resources |
|-------------------------|-------------------|-----------|--------------------|
|                         | Recoverable       | Total     |                    |
| U.S.S.R.                | 136,600           | 273,200   | 5,713,600          |
| China, P.R. of          | 80,000            | 300,000   | 1,000,000          |
| Rest of Asia            | 17,549            | 40,479    | 108,053            |
| United States           | 181,781           | 363,562   | 2,924,503          |
| Canada                  | 5,537             | 9,034     | 108,777            |
| Latin America           | 2,803             | 9,201     | 32,928             |
| Europe                  | 126,775           | 319,807   | 607,521            |
| Africa                  | 15,628            | 30,291    | 58,844             |
| Oceania                 | 24,518            | 74,699    | 199,654            |
| Total                   | 591,191           | 1,402,274 | 10,753,880         |

Source, World Energy Conference, *Survey of Energy Sources*, 1974.

### Natural gas

The natural gas reserves are somewhat different with Russia having the greatest amount, 32.6%, and North and Middle America second with 19.88%. See the natural gas tabulation on Table 4.

### Oil shale

Oil shale deposits are widely distributed throughout the world with the largest reserves being in the United States and Canada. Table 7 shows the countries with the largest reserves. The production of oil from shale oil has not progressed past the pilot plant stage in the United States. This is primarily because foreign oil is cheaper than oil extracted from shale.

### Wood

Forest lands of the world are estimated at 9.6 billion acres, equivalent to about 27% of the land area of the world. The productive forest area is estimated to be about 6.4 billion acres. Of this, about 4 billion acres may be considered as economically accessible.

Until the latter part of the nineteenth century, when it was replaced by coal, wood was the principal source of heat energy. Wood is no longer a major factor as a source of heat energy because of the depletion of the forests and the increasing demands for wood as lumber and in the production of paper, plywood, rayon and other products. Today the burning of wood and bark for steam generation is largely confined to locations where it is available as a by-product or waste from the lumber, furniture, ply-

**Table 3**  
World production of solid fossil fuels by rank and nation, 1971  
(Thousand metric tons—2205 lb/ton)

| Nation or Area  | Anthracite | Bituminous | Brown Coal<br>or Lignite | Peat*  | Total     | Percent of<br>World<br>Production |
|-----------------|------------|------------|--------------------------|--------|-----------|-----------------------------------|
| U.S.S.R.        | 79,000     | 404,000    | 154,000                  | 57,000 | 694,000   | 22.7                              |
| United States   | 8,830      | 495,300    | 5,800                    |        | 509,930   | 16.7                              |
| China, P.R. of  | 20,000     | 390,000**  | (Not reported)           |        | 410,000   | 13.5                              |
| Canada          |            | 14,600     | 3,000                    |        | 17,600    | 0.6                               |
| Europe          |            |            |                          |        |           |                                   |
| Western         | 27,800     | 132,300    | 111,100                  | 320    | 271,520   | 8.9                               |
| Southern        | 3,140      | 8,650      | 46,270                   |        | 58,260    | 1.9                               |
| Northern        | 3,760      | 143,550    | 90                       | 5,020  | 152,420   | 5.0                               |
| Eastern         | 200        | 187,700    | 447,730                  | 50     | 635,680   | 20.6                              |
| Total           | 34,900     | 472,200    | 605,190                  | 5,390  | 1,117,680 | 36.4                              |
| India           |            | 69,120     | 3,700                    |        | 72,820    | 2.4                               |
| Australia       |            | 48,920     | 23,390                   |        | 72,310    | 2.4                               |
| South Africa    | 1,680      | 56,840     |                          |        | 58,520    | 1.9                               |
| Japan           | 1,040      | 32,940     | 130                      |        | 34,110    | 1.1                               |
| North Korea     | 21,800     | 6,170**    | (Not reported)           |        | 27,970    | 0.9                               |
| South Korea     | 12,400     |            |                          |        | 12,400    | 0.4                               |
| Turkey          |            | 4,180      | 5,820                    |        | 10,000    | 0.3                               |
| Rest of Asia    | 3,000      | 8,150**    | 450                      |        | 11,600    | 0.3                               |
| Rest of Oceania |            | 1,920      | 160                      |        | 2,080     | 0.1                               |
| Rest of Africa  | 430        | 4,970      |                          |        | 5,400     | 0.2                               |
| Latin America   | 7          | 10,970     |                          |        | 10,980    | 0.1                               |
| Total           | 183,090    | 2,020,280  | 801,640                  | 62,390 | 3,067,400 | 100.0                             |

\* Includes peat used for fuel only.

\*\* Includes some lignite for Peoples Republic of China, Peoples Republic of Korea, Mongolia and Pakistan.

Source, World Energy Conference, *Survey of Energy Sources*, 1974.

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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| Date Due: _____  | Date Due: _____    |                |

TO: District, Subdistrict and Local Program Air Engineers

FROM: Ed Palagyi, BACT Coordinator

DATE: September 25, 1981

SUBJ: Revised BACT as determined for Georgia-Pacific Corporation.

The attached BACT amends the determination issued to subject applicant on July 13, 1981. Should you have any question regarding this amendment, please contact me at (904) 488-1344 or Suncom 278-1344.

ED/bjm

Attachment

Best Available Control Technology (BACT) Determination

Amendment

Georgia-Pacific Corporation

Putnam County

The applicant plans to increase unbleached pulp production at their facility located in Palatka, Florida. A BACT determination was issued July 13, 1981.

BACT Revision Requested by the Applicant:

The applicant has indicated that peat is not a fossil fuel as defined in the BACT determination of July 13, 1981. The applicant argues that peat is not a fossil fuel as defined in the Florida Administrative Code, Section 17-2.02(54) or EPA New Source Performance Standards, Section 60.41(b).

Applicant contends that peat is not a fossil fuel and therefore no State or Federal emission limitations exist for boilers burning peat as fuel. The applicant recommends a particulate emission limit of 0.2 pounds per million Btu heat input instead of the 0.1 limit determined as BACT.

Original BACT Determination by DER:

The Department determined peat to be a solid fossil fuel based on the fact peat is a precursor of coal as described in the Chemical Engineers Handbook, fifth edition. Authors P.D. Moore and D.J. Bellamy in their publication "Peatlands" describe peat as the fossilized excess of thousands of years of photosynthesis and this storage of a reserve of energy by mire ecosystems is of considerable importance since such "fossil" energy can be tapped by man and released in combustion.

The particulate emission limit of 0.1 pounds per million Btu heat input originally determined as BACT is equal to the New Source Performance Standard (NSPS) for fossil-fuel-fired steam generators, Subpart D, Subsection 60.42(1).

Amended BACT Determination by DER:

The first paragraph under the subsection "justification of DER determination" of the BACT determination issued July 13, 1981 is to be deleted and replaced by the following paragraph:

*"The applicant plans to fire peat and/or bark as the fuel in the prototype steam generator No. 5. Peat and lignite form a transition layer between biomasses and coals (Tappi-August 1981), therefore peat, being neither a fossil-fuel nor a carbonaceous fuel as defined in 17-2. F.A.C., is presently considered an unclassified fuel. Bark, however, is defined as "wood residue" in NSPS, Subpart D, subsection 60.41(e), and as a "carbonaceous fuel" in 17-2.02(21) F.A.C.*

Justification of Determination Amendment:

The Department agrees with the applicant's request not to define peat as a fossil fuel. Establishing a definition is a rule making process and beyond the scope of a BACT determination. Peat, for this determination, will be considered an alternate energy source.

Peat has found use as fuel in the USSR, Ireland, and Finland but was only recently considered an alternative boiler fuel by United States industry. The technology to fire peat is not unknown and the Department believes that the manufacturers of emission control devices now have the expertise to build equipment for the level of particulate control required for this installation.

The Department reaffirms that the particulate emission limit, for steam generator No. 5, of 0.1 pound per million Btu heat input is BACT as per the determination of July 13, 1981.

In making this determination, the Department recognizes that peat mire ecosystems vary in composition. There is not sufficient information at this time to indicate the particulate emission limit determined as BACT is not achievable. If information becomes available, and the Department determines the particulate emission limit is not achievable, the BACT determination will be reviewed and the appropriate changes made.

Details of the Analysis May be Obtained by Contacting:

Edward Palagyi, BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Recommended By:

Steve Smallwood  
Steve Smallwood, Chief, BAQM

Date:

9/24/81

Approved:

Victoria Tschinkel  
Victoria Tschinkel, Secretary

Date:

Sept. 25, 1981



**ATTACHMENTS B**



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

*Recd  
9/2/81  
pm*

*Bill*

August 25, 1981

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

Dear Mr. Fancy:

In response to the Department's concern about odor control for new miscellaneous sources such as new digesters, evaporator vents, and brown stock washer vents associated with the Mill's expansion, I would like to assure you that G-P will comply fully with the New Source Performance Standards wherever they apply.

Current plans, though preliminary, are to incinerate the odoriferous gases in the lime kiln which will result in the complete control of the odor from these sources.

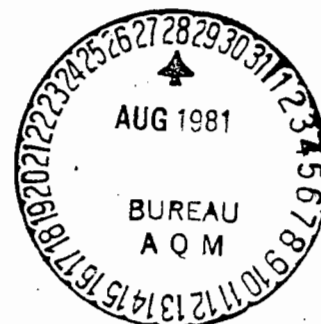
If I can be of further service, please let me know.

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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



July 31, 1981  
ESE No. 81-128-100



Mr. Steve Smallwood, P.E.  
Chief, Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Subject: Permit Applications AC54-43773, AC54-43791, and AC54-43795

Dear Mr. Smallwood:

ESE, on behalf of Georgia Pacific Corporation, has reviewed your comments concerning the above referenced applications as contained in your letter of July 2, 1981. Presented below are the responses to these comments.

SO<sub>2</sub> Short-Term Analysis

\*Table 4-2 was found to be incorrect in regards to SO<sub>2</sub> emissions for Lime Kilns #1, #2, and #3 and Power Boiler #4. The correct values are as shown in the computer model printouts. A revised Table 4-2 is included for your convenience.

\*Your comments concerning the five-year SO<sub>2</sub> ISCST runs are correct. This source group (all projected sources) has been rerun with the five-year ISCST, and all ISCST refinements with this source group have also been rerun. These runs resulted in slightly higher projected SO<sub>2</sub> impacts, and as a result revised sections 6.0 and 7.1 of the PSD report are included for your review. Other sections of the PSD report are not affected by these changes in projected SO<sub>2</sub> air quality. As you will note, there is now slightly positive SO<sub>2</sub> increment consumption predicted for the proposed modification. Supportive computer model printouts are attached.

TSP Short-Term Analysis

\*Your comment is correct concerning the five year TSP ISCST run. However, source group #3 contained only the proposed new G-P sources. The impacts from these sources were not used directly in the analysis, and actually were not even referred to in the report. Since this source group does not have any bearing on the results or conclusions of the PSD report, it is not considered necessary to rerun the model for this source group.

Long-Term Analysis

\*Per your request, a key to the modeled sources is provided for both the SO<sub>2</sub> and TSP ISCLT model runs.

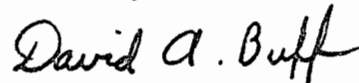
ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

Mr. Steve Smallwood  
July 31, 1981  
Page 2

Additional information has also been provided in Sections 6.1 and 6.2 demonstrating compliance with AAQS and PSD increments in the vicinity of Seminole Electric and FPL with the proposed sources in operation. This information should satisfy any concerns the Department may have had on this aspect of the project.

We hope this information facilitates your review of the application, but if you have any further questions, please call.

Sincerely,



David A. Buff, P.E.  
Senior Engineer  
Project Operations

DAB/sn

cc: Vernon Adams

Table 4-1. Short-Term Modeling Case Runs and Meteorological Periods

| Scenario                           | Day                                 |
|------------------------------------|-------------------------------------|
| <u>SO<sub>2</sub></u>              |                                     |
| Maximum 24-Hour                    | 280, 1970                           |
| Interaction with Seminole Electric | 109, 1974<br>116, 1974<br>279, 1974 |
| Interaction with FP&L Plants       | 280, 1970                           |
| Maximum 3-Hour                     | 180, 4/1971                         |
| Interaction with Seminole Electric | 109, 4/1974                         |
| Interaction with FP&L Plants       | 171, 6/1974                         |
| <u>TSP</u>                         |                                     |
| Maximum 24-Hour                    | 222, 1971<br>137, 1973<br>281, 1970 |
| Interaction with Seminole Electric | 7, 1973                             |
| Interaction with FP&L Plants       | 143, 1971                           |

and various modeling reports were considered in developing the inventory, and the maximum emission rates contained therein were used.

#### 4.4 AIR QUALITY IMPACT DETERMINATION

The ISCLT model was used to estimate annual average ground-level concentrations for TSP and SO<sub>2</sub>. For these pollutants, modeling was performed for permitted sources within a 50-km radius, including the G-P sources. For annual nitrogen oxides (NO<sub>x</sub>), reference is made to the March 1981 POS for which NO<sub>x</sub> modeling was conducted. These modeling results showed that the proposed action will pose no threat to the AAQS. All annual printouts are included in Appendix B of this report.

Evaluation of short-term maximum impacts (highest, second-highest) for TSP and SO<sub>2</sub> for the G-P proposed conditions was made using the ISCST. The appropriate highest, second-highest concentrations were determined in 5-year ISCST executions with the following short-term interacting sources included with the G-P sources in the source input data:

1. Seminole Electric (7.5 km and 39 degrees from G-P),
2. FPL Putnam (10.9 km and 120 degrees from G-P), and
3. FPL Palatka (10.6 km and 123 degrees from G-P).

The results of the 5-year ISCST modeling were refined using the ISCST model to determine the maximum impacts and impacts in the interacting directions. The modeled sources and emissions are shown in Table 4-2.

#### 4.5 INCREMENT CONSUMPTION DETERMINATION

The maximum short-term PSD increment consumption was determined by subtracting receptors point-by-point in 5-year ISCST baseline executions from 5-year ISCST projected impacts. Seminole Electric is the only new source in the G-P impact area and currently is under construction. FPL Palatka consumes TSP increments by virtue of a variance to emit particulate up to 0.3 lb/10<sup>6</sup> Btu, increased from 0.1 lb/10<sup>6</sup> Btu. FPL Putnam

Table 4-2. Modeled Sources and Emissions for G-P Proposed Modification

| Source                            | Baseline Emissions |                 |                    |                      | Projected Emissions |                 |
|-----------------------------------|--------------------|-----------------|--------------------|----------------------|---------------------|-----------------|
|                                   | Annual (TPY)       |                 | Short-Term (lb/hr) |                      | (lb/hr)             |                 |
|                                   | TSP                | SO <sub>2</sub> | TSP                | SO <sub>2</sub>      | TSP                 | SO <sub>2</sub> |
| Recovery Boiler #1                | 345                | 216             | 78.8               | 49.3                 | —                   | —               |
| Recovery Boiler #2                | 441                | 309             | 100.7              | 70.5                 | —                   | —               |
| Recovery Boiler #3                | 477                | 298             | 109.0              | 68.1                 | —                   | —               |
| Recovery Boiler #4                | 729                | 1,215           | 166.5              | 277.5                | 166.5               | 277.5           |
| Proposed Recovery Boiler #5       | —                  | —               | —                  | —                    | 75.4                | 250.0           |
| Smelt #1                          | 11                 | 4               | 2.4                | 1.0                  | —                   | —               |
| Smelt #2                          | 16                 | 6               | 3.6                | 1.4                  | —                   | —               |
| Smelt #3                          | 14                 | 6               | 3.3                | 1.4                  | —                   | —               |
| Smelt #4                          | 193                | 25              | 40.8               | 5.6                  | 40.8                | 5.6             |
| Proposed Smelt                    | —                  | —               | —                  | —                    | 15.0                | 5.2             |
| Lime Kiln #1                      | 723                | 8               | 180.0              | 1.9                  | —                   | —               |
| Lime Kiln #2                      | 415                | 8               | 95.0               | 1.9                  | —                   | —               |
| Lime Kiln #3                      | 407                | 17              | 93.0               | 3.8                  | —                   | —               |
| Lime Kiln #4                      | 54.6               | 48.6            | 31.6               | 11.1                 | 31.6                | 11.1            |
| Proposed Lime Kiln #5             | —                  | —               | —                  | —                    | 29.3                | 10.5            |
| Power Boiler #4                   | 105                | 1,192           | 106.3              | 358.9 <sup>x10</sup> | 106.3               | 358.9           |
| Power Boiler #5                   | 186                | 4,658           | 46.4               | 1,279.0              | 46.4                | 1,279.0         |
| Combination Boiler #4             | 2,561              | 1,008           | 711.8              | 962.5                | 117.0               | 962.5           |
| Proposed Combination<br>Boiler #5 | —                  | —               | —                  | —                    | 216.7               | 654.0           |
| FPL Palatka                       | 468                | 12,888          | 107.0              | 2,942.5              | 321.0               | 2,942.5         |
| FPL Putnam                        | 1,206              | 6,723           | 275.4              | 1,535.0              | 275.4               | 3,070.0         |
| Seminole                          | —                  | —               | —                  | —                    | 324.6               | 12,984.1        |

Sources: ESE, 1981. G-P, 1981.

## 6.0 IMPACT ANALYSIS RESULTS

### 6.1 AIR QUALITY STANDARDS

#### 6.1.1 Particulate Matter

The highest, second-highest predicted 24-hour ground-level concentration for the projected conditions considering the proposed action at G-P is  $107.5 \text{ ug/m}^3$ , including an assumed background concentration of  $80 \text{ ug/m}^3$ . This predicted maximum impact (highest, second-highest) is 72 percent of the AAQS for TSP. Predicted maximum interaction impacts are 101, 105, and  $102 \text{ ug/m}^3$  (including background). These interactions are 67, 70, and 68 percent of the AAQS for TSP and result from operations at Seminole Electric, FPL Palatka, and FPL Putnam, respectively.

The maximum predicted annual TSP impact for the projected conditions, including all interacting sources, is  $44 \text{ ug/m}^3$  and is 73 percent of the annual AAQS for TSP. This value includes the assumed background of  $40 \text{ ug/m}^3$ . All modeling results are shown in Table 6-1 along with the applicable AAQS for visual comparison.

In order to demonstrate that AAQS will not be violated in the vicinity of Seminole Electric or FPL Palatka/Putnam due to operation of the proposed sources, two air quality impact reports were reviewed: "Seminole Electric PSD Application," Section 9.0, Modeling Analysis Results; and "Analysis of the Air Quality Impact Resulting From a Particulate Emission Rule Change for Fossil-Fuel Steam Generators in Florida," ESE, Inc., May 1979.

In the first referenced report, maximum TSP impacts in the vicinity of Seminole, Georgia-Pacific, and FPL were  $3 \text{ ug/m}^3$ , annual average, and occurred 10 km almost due north of Seminole. If the maximum annual average TSP impact in the vicinity of Georgia-Pacific due to these sources, i.e.,  $4 \text{ ug/m}^3$ , is added to this (i.e., maximum added to maximum),  $7 \text{ ug/m}^3$  is the result. Adding the TSP background of  $40 \text{ ug/m}^3$  results in a total of  $47 \text{ ug/m}^3$ , well below the annual standard of  $60 \text{ ug/m}^3$ .



Table 6-1. Proposed G-P Mill Modification: Maximum Annual and Highest, Second-Highest Short-Term Predicted Concentrations\*

| Scenario                              | Concentration (ug/m <sup>3</sup> ) |                         |             |                        |            |
|---------------------------------------|------------------------------------|-------------------------|-------------|------------------------|------------|
|                                       | 3-Hour SO <sub>2</sub>             | 24-Hour SO <sub>2</sub> | 24-Hour TSP | Annual SO <sub>2</sub> | Annual TSP |
| Maximum Predicted                     | 410                                | 116                     | 108         | 22                     | 44         |
| Interaction with<br>Seminole Electric | 346                                | 71                      | 101         | --                     | --         |
| Interaction with<br>FPL Putnam        | 355                                | 116                     | 105         | --                     | --         |
| Interaction with<br>FPL Palatka       | 355                                | 116                     | 102         | --                     | --         |
| State of Florida<br>Standard          | 1,300                              | 260                     | 150         | 60                     | 60         |

\* Concentrations include a TSP background of 80 ug/m<sup>3</sup> (24-hour) and 40 ug/m<sup>3</sup> (annual).

Source: ESE, 1981.

For the 24-hour averaging time, the Seminole PSD predicted a highest, second-highest point source impact of  $5 \text{ ug/m}^3$ , which occurred in the vicinity of FPL. This value, however, does not reflect FPL Palatka's variance from 0.1 lb/mm Btu to 0.3 lb/mm Btu for particulate emissions. In the second referenced report above, FPL Palatka was predicted to have a maximum increase of  $8 \text{ ug/m}^3$  24-hour impact due to the variance emission rate of 0.3 lb/mm Btu (Table 5.3 of said report). Adding both of these predicted maximums to the highest, second-highest predicted impact in the vicinity of G-P,  $28 \text{ ug/m}^3$  (excluding background; see Table 6-1), and adding the background,  $80 \text{ ug/m}^3$ , results in a total 24-hour concentration of  $121 \text{ ug/m}^3$ . This value is still well below the AAQS of  $150 \text{ ug/m}^3$ . This analysis, which is extremely conservative in nature, serves to adequately demonstrate without additional modeling that the TSP AAQS will not be violated in the vicinity of Seminole and FPL.

#### 6.1.2 Sulfur Dioxide

The highest, second-highest 3- and 24-hour concentrations predicted for the proposed conditions are 410 and  $116 \text{ ug/m}^3$ , respectively. Predicted highest, second-highest concentrations due to interaction with Seminole Electric, FPL Putnam, and FPL Palatka are 346, 355, and  $355 \text{ ug/m}^3$ , respectively, for the 3-hour averaging time, and 71, 116, and  $116 \text{ ug/m}^3$ , respectively, for the 24-hour averaging time (see Table 6-1). The maximum predicted annual  $\text{SO}_2$  impact as a result of the proposed and including interacting sources is  $22 \text{ ug/m}^3$ , or 37 percent of the annual  $\text{SO}_2$  standard.

In order to demonstrate that  $\text{SO}_2$  AAQS will not be violated in the vicinity of Seminole Electric or FPL Palatka/Putnam due to operation of the proposed sources, three air quality impact reports were reviewed: "Seminole Electric PSD Application," Section 9.0, Modeling Analysis Results; "Analysis of the Air Quality Impact Resulting from Burning Higher Sulfur Fuels," prepared for Florida Power & Light Company by ESE, Inc., March 1979; and "Study of the Impact on Air Quality as a Result of Stack Height Changes at FP&L Putnam Facilities," ESE, Inc., January 1980.

In the first referenced report, a maximum annual SO<sub>2</sub> concentration due to Seminole, G-P, and FPL was reported as 28 ug/m<sup>3</sup>, occurring 6 km almost due south of Seminole. If this value is added directly to the maximum annual average predicted in the vicinity of G-P, 22 ug/m<sup>3</sup>, the result is 50 ug/m<sup>3</sup>, which is still below the AAQS of 60 ug/m<sup>3</sup>. This is an extremely conservative methodology and result.

In the Seminole PSD application, the highest, second-highest reported SO<sub>2</sub> impacts were 60 ug/m<sup>3</sup>, 24-hour, and 514 ug/m<sup>3</sup>, 3-hour concentration. Both of these maximums occurred in the immediate vicinity of Seminole Electric. If this maximum is added directly to the highest, second-highest predicted concentrations in the vicinity of G-P (see Table 6-1), the resulting concentrations are 176 ug/m<sup>3</sup>, 24-hour average, and 924 ug/m<sup>3</sup>, 3-hour average. These levels are well below the SO<sub>2</sub> AAQS.

Review of the other referenced reports revealed that compliance with AAQS in the vicinity of FPL Palatka/Putnam could not be adequately demonstrated by the above conservative approach. Therefore, an additional 5-year ISCST model was executed with all projected sources included and receptors placed downwind of FPL in the direction which aligns FPL and G-P, 120° from north. The resulting highest, second-highest impacts were 87 ug/m<sup>3</sup>, 24-hour average, and 310 ug/m<sup>3</sup>, 3-hour average. These levels are below the AAQS and demonstrate that G-P will not cause or contribute to any violations in the vicinity of FPL.

### 6.1.3 Nitrogen Oxides and Carbon Monoxide

Preliminary modeling conducted for the POS showed small impacts for NO<sub>x</sub> and CO; therefore, no additional modeling was conducted.

## 6.2 INCREMENT CONSUMPTION

The short-term increment consumption analysis is the same for the federal review as for DER; however, because EPA uses actual baseline emissions instead of allowable, the annual analysis predicted slightly different consumptions for the proposed action. The predicted short-term TSP

increment consumption under both EPA and DER regulations is negative (i.e., an air quality improvement at all locations compared to the baseline concentrations). Maximum increment consumption for SO<sub>2</sub> in the vicinity of G-P, based upon receptor-by-receptor subtraction of the 5-year ISCST baseline and projected results, is predicted to be 99 ug/m<sup>3</sup>, 3-hour average, and 15 ug/m<sup>3</sup>, 24-hour average. Because these maximum increment consumption levels are low compared to the allowable PSD increments, refined increment consumption model runs were not performed.

To demonstrate that PSD increments for SO<sub>2</sub> will not be exceeded in the vicinity of Seminole Electric, the reports referenced in Section 6.1 were again reviewed. In the Seminole PSD application, Seminole was the only increment consuming source, and it consumed a maximum of 5 ug/m<sup>3</sup>, annual average SO<sub>2</sub>, 60 ug/m<sup>3</sup>, 24-hour average, and 437 ug/m<sup>3</sup>, 3-hour average. The maximum predicted increment consumption in the vicinity of G-P and in the direction towards Seminole Electric (see computer model printouts) is 6 ug/m<sup>3</sup>, annual average, 7 ug/m<sup>3</sup>, 24-hour average, and 24 ug/m<sup>3</sup>, 3-hour average. If these are added directly to the Seminole maximums, which is an extremely conservative methodology, the resulting concentrations are 11 ug/m<sup>3</sup>, annual average, 67 ug/m<sup>3</sup>, 24-hour average, and 461 ug/m<sup>3</sup>, 3-hour average. These values are all below the allowable Class II PSD increments.

To demonstrate that PSD increments for SO<sub>2</sub> will not be violated in the vicinity of FPL Palatka/Putnam, an additional 5-year ISCST with both baseline and projected sources was executed, with receptors placed downwind of FPL along the direction which aligns G-P and FPL. The results of this analysis showed maximum 24-hour increment consumption of 22 ug/m<sup>3</sup> and maximum 3-hour increment consumption of 86 ug/m<sup>3</sup>, both below allowable Class II increments.

Annual TSP increment consumption under both DER and EPA regulations was negative at all receptor locations, indicating an improvement in TSP air quality compared to the baseline concentrations. Annual SO<sub>2</sub> increment

consumption based on DER regulations was less than 5 ug/m<sup>3</sup>, and annual SO<sub>2</sub> increment consumption was less than 6 ug/m<sup>3</sup>. Results of the increment consumption analysis are presented in Table 6-2 along with allowable Class II increments for comparison purposes.

### 6.3 CLASS I IMPACTS

Because of the distance to the nearest Class I area (Okefenokee Swamp, 120 km northwest), impacts on the Class I area were not addressed quantitatively. However, increment modeling in the vicinity of G-P showed a substantial decrease in TSP levels since the baseline.

### 6.4 DOWNWASH

In comparing the 24-hour highest, second-highest TSP refinement execution requesting the G-P proposed sources only with and without downwash, it was found that with the consideration of downwash effects, the maximum increase was only 1 ug/m<sup>3</sup> above no downwash considerations. For the 24-hour SO<sub>2</sub> refinement, the maximum increase was 5 ug/m<sup>3</sup> above the no-downwash case (24-hour averages).

In comparing four selected hours of meteorological data conducive to downwash effects, the maximum 1-hour increase due to downwash was 27 ug/m<sup>3</sup> for TSP and 50 ug/m for SO<sub>2</sub>. Using the EPA method given in the guidelines document, Volume 10, a factor of 0.6 (maximum) was used to correct for a 24-hour average. The increases were then predicted to be 16 ug/m<sup>3</sup> and 30 ug/m<sup>3</sup>, respectively. If these increases were applied to the worst-case modeling results (see Sections 6.1.1 and 6.1.2), the resulting concentrations would remain below AAQS (123.5 ug/m<sup>3</sup> for 24-hour TSP and 127.6 for 24-hour SO<sub>2</sub>), indicating that the stacks proposed at heights less than GEP will not pose a threat to AAQS.

Table 6-2. Summary of PSD Increment Consumption Results: Proposed G-P Modification

| Pollutant                     | Increment Consumption (ug/m <sup>3</sup> ) |         |        |        |         |        |
|-------------------------------|--|---------|--------|--------|---------|--------|
|                               | EPA  |         |        | DER    |         |        |
|                               | 3-Hour                                     | 24-Hour | Annual | 3-Hour | 24-Hour | Annual |
| <u>Sulfur Dioxide</u>         |  |         |        |        |         |        |
| Maximum Increment Consumption | 99   | 15      | <6     | 99     | 15      | <5     |
| Allowable Increment           | 512  | 91      | 20     | 512    | 91      | 20     |
| <u>Particulate</u>            |  |         |        |        |         |        |
| Maximum Increment Consumption | --   | <0      | <0     | --     | <0      | <0     |
| Allowable Increment           | --   | 37      | 19     | --     | 37      | 19     |

Source: ESE, 1981.

## 7.0 ADDITIONAL IMPACTS ON SOILS, VEGETATION, AND VISIBILITY

### 7.1 IMPACTS ON SOILS AND VEGETATION

Impacts on soils and vegetation due to operation of the proposed sources are expected to be minor. The projected highest, second-highest 3-hour SO<sub>2</sub> concentration of 410 ug/m<sup>3</sup> and annual mean concentration of 22 ug/m<sup>3</sup> (see Table 6-1) are well below levels generally reported for damage to sensitive plant species. As an example of such damage levels, European studies have found one-half hour levels of 3,406 ug/m<sup>3</sup> and long-term means of 393 ug/m<sup>3</sup> to approximate threshold levels for several species (Heck and Brandt, 1977). Other long-term studies have indicated threshold ranges for sensitive species of 47 ug/m<sup>3</sup> to 78 ug/m<sup>3</sup> over two to four months of exposure and 31 ug/m<sup>3</sup> over seven months (Florida Sulfur Oxides Study, Inc., 1978).

Alfalfa, which is commonly thought to be one of the most SO<sub>2</sub>-sensitive species, has a 2-hour threshold level of at least 2,620 ug/m<sup>2</sup> and an 8-hour threshold of 655 ug/m<sup>2</sup> (Heck and Brandt, 1977), far above the predicted impact levels. Based upon results such as these, no discernable impacts are predicted from this the proposed modification.

Particulate matter is generally considered to have a relatively unimportant effect on vegetation (Jacobson & Hill, 1970). A net air quality improvement is predicted over the baseline conditions (see Section 6); as such, no adverse effect on soils and vegetation due to particulate emissions is expected.

Plant species classified as "sensitive" to NO<sub>2</sub>, such as pinto bean, cucumber, lettuce, and tomato, displayed injury when exposed to NO<sub>2</sub> levels of 3,760 to 4,960 ug/m<sup>3</sup> for a 2-hour period. Extremely resistant species, such as heath, were unaffected by an exposure of 1,900,000 ug/m<sup>3</sup> for 1 hour. Blue grass, orange tree plants, and rye are all classified as "intermediate" in resistance to NO<sub>2</sub> injury.

TSP ISCLT - Key to Sources Modeled

| <u>Source No.</u> | <u>Source Description</u>             |
|-------------------|---------------------------------------|
| 1                 | P.B.#4 Projected, DER, EPA Baseline   |
| 2                 | Combo Boiler #4, Projected            |
| 3                 | P.B.#5 Projected, DER, EPA Baseline   |
| 4                 | R.B.#4 Projected, DER, EPA Baseline   |
| 5                 | Smelt #4 Projected, DER, EPA Baseline |
| 6                 | L.K.#4 Projected, DER, EPA Baseline   |
| 7                 | Proposed Lime Kiln #5                 |
| 8                 | Proposed R.B. #5                      |
| 9                 | Proposed Smelt Tanks #5               |
| 10                | Proposed Combo Boiler #5              |
| 11                | FPL Palatka - DER, EPA Baseline       |
| 12                | Seminole                              |
| 13                | FPL Putnam - Projected                |
| 14                | R.B.#1, DER, EPA Baseline             |
| 15                | R.B.#2, DER, EPA Baseline             |
| 16                | R.B.#3, DER, EPA Baseline             |
| 17                | Smelt #1, DER, EPA Baseline           |
| 18                | Smelt #2, DER, EPA Baseline           |
| 19                | Smelt #3, DER, EPA Baseline           |
| 20                | Lime Kiln #1, DER, EPA Baseline       |
| 21                | Lime Kiln #2, DER, EPA Baseline       |
| 22                | Lime Kiln #3, DER, EPA Baseline       |
| 23                | Combo Boiler #4, DER, EPA Baseline    |
| 24                | *FPL Putnam Baseline                  |
| 25                | Feldspar Corporation                  |
| 26                | Feldspar Corporation                  |
| 27                | Feldspar Corporation                  |
| 28                | National Protein                      |
| 29                | Florida Solite Corporation            |
| 30                | Florida Solite Corporation            |
| 31                | Johns Manville Prod. Corporation      |
| 32                | E.I. Dupont                           |
| 33                | E.I. Dupont                           |

\* Note: Stack height should have been 17.67 m. This difference is insignificant, however, and actually would result in a higher baseline concentration and therefore lower increment consumption.



SO<sub>2</sub> ISCLT - Key to Sources Modeled

| <u>Source No.</u> | <u>Source Description</u>                      |
|-------------------|--|
| 1                 | P.B.#4 - Projected, EPA, DER Baseline          |
| 2                 | Combo Boiler #4 - Projected, EPA, DER Baseline |
| 3                 | P.B.#5 - Projected, EPA, DER Baseline          |
| 4                 | R.B.#4 - Projected, EPA, DER Baseline          |
| 5                 | Smelt #4 - Projected, EPA, DER Baseline        |
| 6                 | L.K. #4 - Projected EPA, DER Baseline          |
| 7                 | Proposed Lime Kiln #5                          |
| 8                 | Proposed R.B. #5                               |
| 9                 | Proposed Smelt Tanks #5                        |
| 10                | Proposed Combo Boilers #5                      |
| 11                | FPL Palatka - Projected, DER, EPA Baseline     |
| 12                | Seminole                                       |
| 13                | FPL Putnam - Projected                         |
| 14                | R.B.#1 - DER, EPA Baseline                     |
| 15                | R.B.#2 - DER, EPA Baseline                     |
| 16                | R.B.#3 - DER, EPA Baseline                     |
| 17                | Smelt #1 - DER, EPA Baseline                   |
| 18                | Smelt #2 - DER, EPA Baseline                   |
| 19                | Smelt #3 - DER, EPA Baseline                   |
| 20                | Lime Kiln #1 - DER, EPA Baseline               |
| 21                | Lime Kiln #2 - DER, EPA Baseline               |
| 22                | Lime Kiln #3 - DER, EPA Baseline               |
| 23                | Combo Boiler #4 - Baseline                     |
| 24                | FPL Putnam - Baseline                          |



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

June 30, 1981

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

Dear Mr. Mitchell:

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

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

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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





Georgia-Pacific Corporation

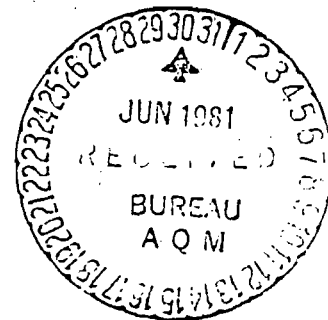
Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

June 26, 1981

*John*

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



Dear Mr. Fancy:

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

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

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

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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

PERMIT CONDITIONS

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43773

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Combination  
Boiler No. 5 (fired with  
bark and/or peat).

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a combination boiler to produce a maximum of 700,000 lbs./hr. of steam, fired with bark and/or peat, equipped with an electrostatic precipitator, and will use No. 6 Fuel Oil, (maximum 2.5% Sulfur content, not to exceed 40 barrels/hr. - maximum  $250 \times 10^6$  Btu/hr. heat input), as an auxiliary fuel for startup, shutdown, and emergency only. Permitted hours of operation will be 8760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.22 (16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachments B).
4. Stack sampling drawing.

PERMIT NO.: AC 54-43773  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare; animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water; nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
  - Determination of Best Available Control Technology (BACT)
  - Determination of Prevention of Significant Deterioration (PSD)
  - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 54-43773  
 APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum steam generation will be 700,000 pounds per hour at 350°F.
5. Maximum bark consumption will be 254,965 pounds per hour with a maximum heat input of  $1083.6 \times 10^6$  Btu per hour.
6. Maximum peat consumption will be 217,869 pounds per hour with a maximum heat input of  $1005.9 \times 10^6$  Btu per hour.
7. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, and emergency. Maximum sulfur content is 2.5%. Maximum consumption will be 40 barrels per hour with a maximum heat input of  $250 \times 10^6$  Btu per hour.
8. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limitation</u>  | <u>Maximum Allowable Emissions:</u><br>(lbs./hr.) |             |
|--------------------|---|---|-------------|
|                    |   | <u>Bark</u>                                       | <u>Peat</u> |
| Particulate Matter | 0.10 lbs./ $10^6$ Btu heat input  | 108.36  | 100.59      |
| SO <sub>2</sub>    | 0.65 lbs./ $10^6$ Btu heat input  | 704.34  | 653.84      |
| NO <sub>x</sub>    | 0.30 lbs./ $10^6$ Btu heat input  | 325.08  | 301.77      |
| VE                 | 20% maximum Opacity (except for one 6-minute period per hour of not more than 27% Opacity). |   |             |

PERMIT NO.: AC 54-43773  
APPLICANT: Georgia-Pacific Corporation

Specific Conditions (Cont'd)

9. To assure compliance of the emission limits imposed through BACT the applicant shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions. Testing for particulate matter will be EPA reference methods 1, 2, 3, 5 and 9 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source and/or 17-2.23, FAC. Stack sampling facilities will include the eyebolts and angle described in the attached figure..
10. Before the construction permit expires, the proposed boiler will be sampled for pollutant emissions as described in "Specific Condition No. 9".
11. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
12. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, and amount of steam produced.

Expiration Date: December, 1983

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

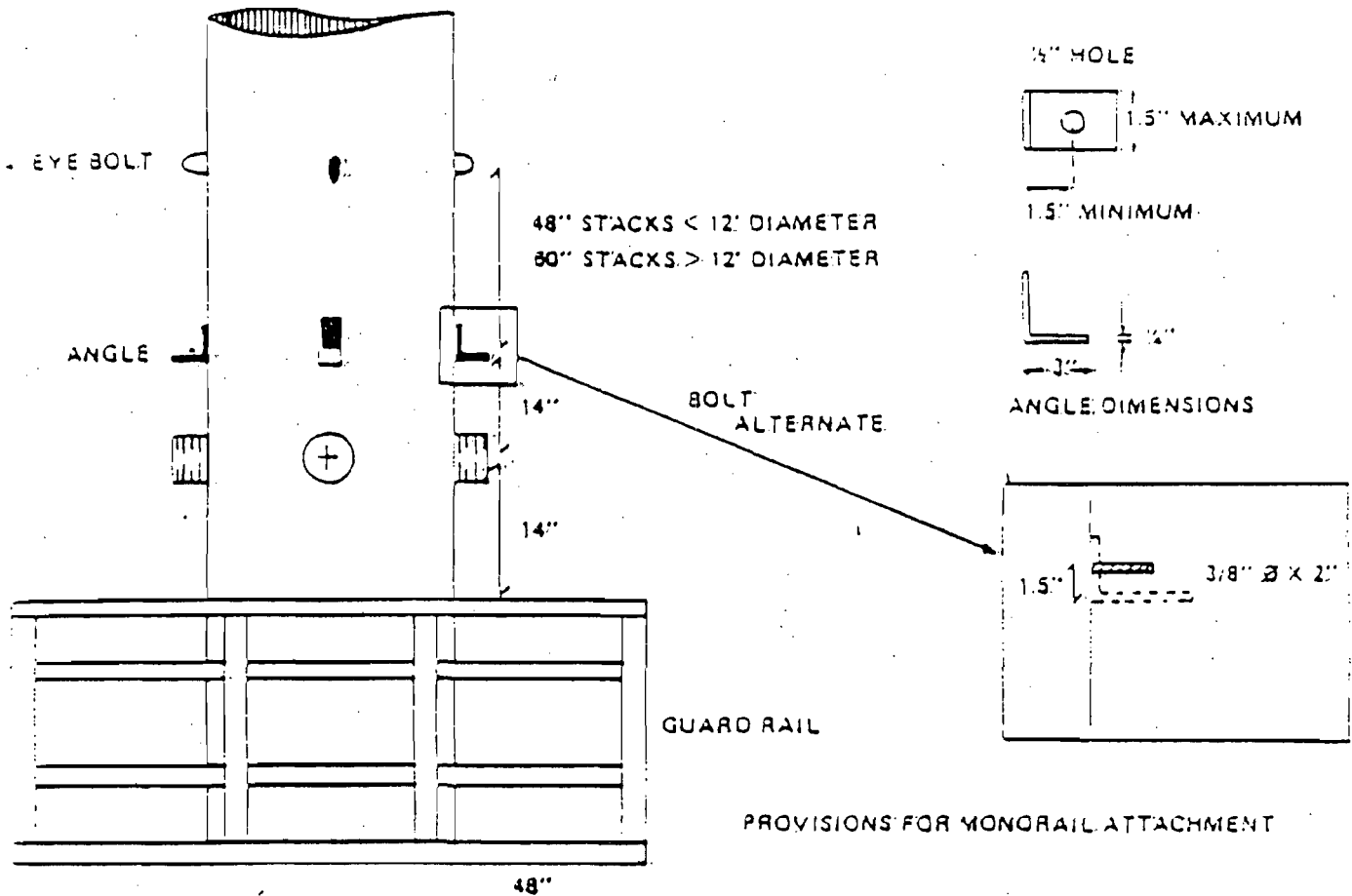
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

\_\_\_\_\_ Pages Attached.

\_\_\_\_\_  
Signature

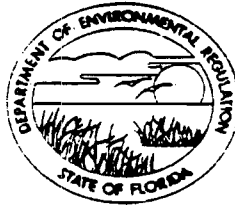


AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK I.B. WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43791

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Recovery  
Boiler No. 5 and two  
Smelt Dissolving Tanks  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes; and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a recovery boiler to produce a maximum of 607,500 lbs./hr. of steam, equipped with an electrostatic precipitator. In addition, two smelt dissolving tanks will be constructed, equipped with a wet scrubber each. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.22(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachment B).
4. Stack sampling drawing.

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions," and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title; and does not constitute authority for the reclamation 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.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the sources.
3. Operation time will be 8,760 hours per year.
4. Maximum steam generation will be 607,500 pounds per hour at 393°F. Maximum black liquor, at 65% solids, consumption will be 230,679 pounds per hour with a maximum heat input of  $990 \times 10^6$  Btu per hour, yielding 63,000 pounds per hour of smelt.
5. Maximum total smelt utilization in the smelt dissolving tanks is 63,000 pounds per hour.
6. No. 6 Fuel Oil is to be fired only as an auxiliary fuel for startup, shutdown, emergency and system checking. Maximum sulfur content is 2.5%. Maximum consumption will be 23.8 barrels per hour with a maximum heat input of  $146 \times 10^6$  Btu per hour.
7. Maximum allowable emissions are:

Recovery Boiler No. 5:

| <u>Pollutant</u>              | <u>Emission Limitation</u>                                     | <u>Maximum Allowable Emissions</u><br>(lbs./hr.) |
|-------------------------------|--|--|
| Particulate Matter            | 0.044 grains/DSCF<br>corrected to 8% oxygen                    | 75.4   |
| Total Reduced<br>Sulfur (TRS) | 5 ppm. by volume on a<br>dry basis, corrected to<br>8% oxygen. | 97.96  |
| SO <sub>2</sub>               | 50 ppm   | 5.2  |
| Visible Emissions             | 30% maximum Opacity  |  |

PERMIT NO.: AC 54-43791  
APPLICANT: Georgia-Pacific

Smelt Dissolving Tanks No. 5:

| <u>Pollutant</u>   | <u>Emission Limitation</u>                       | <u>Maximum Allowable Emissions</u><br>(total)<br>(lbs./hr.) |
|--------------------|--|---|
| Particulate Matter | 0.2 lbs./ton black liquor solids (dry weight)    | 15.0  |
| TRS                | 0.0168 lbs./ton black liquor solids (dry weight) | 1.26  |

8. To assure compliance of the emission limits imposed through BACT and New Source Performance Standards (NSPS), 40 CFR 60, Subpart BB, the applicant shall install, calibrate, maintain, and operate continuous monitoring systems for measuring opacity of emissions and TRS emissions from the recovery boiler.
9. For emissions from the recovery boiler and smelt tanks, compliance test procedures will be EPA reference methods 1, 2, 3, 5, 9 and 16 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source. Stack sampling facilities will include the eyebolt and angle described in the attached figure.
10. Before the construction permit expires, the recovery boiler and two smelt tanks will be sampled for pollutant emissions as described in "Specific Condition No. 9".
11. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
12. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, and amount of steam produced.

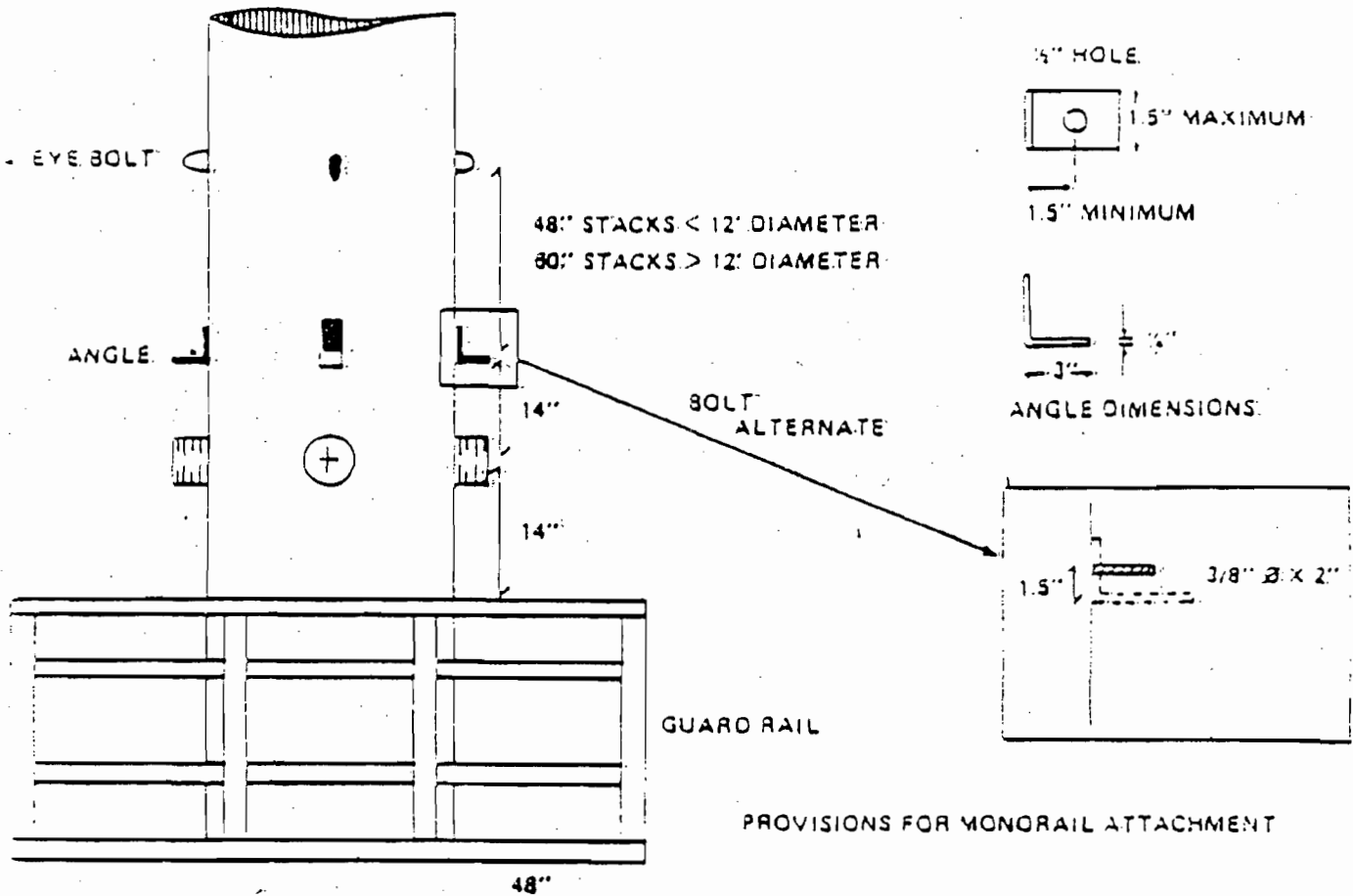
Expiration Date: December, 1985 Issued this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

\_\_\_\_\_ Pages Attached.

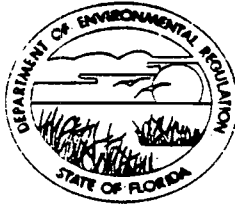
\_\_\_\_\_  
Signature

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

TWIN TOWERS OFFICE BUILDING.  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32077

PERMIT/CERTIFICATION  
NO. AC 54-43795

COUNTY: Putnam

PROJECT: Kraft Pulp Mill  
Expansion: Lime Kiln  
No. 5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a lime kiln with a maximum capacity of 320 tons per day, equipped with a high energy venturi scrubber. No. 6 Fuel Oil maximum consumption will be 16.6 barrels per hour with a maximum heat input of  $102 \times 10^6$  Btu per hour. Maximum sulfur content is 2.5%. Permitted hours of operation will be 8,760 hours.

Construction shall be in accordance with the permit application and application amendments, documents, and drawings except as otherwise noted on pages 3 and 4, "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.22(16).
2. BACT determination (see Attachment A).
3. Georgia-Pacific Corporation's letter of June 30, 1981 (change of operating hours, see Attachments B).
4. Stack sampling drawing.

PERMIT NO.: AC 54-43795  
APPLICANT: Georgia-Pacific Corporation

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions," and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
  - Determination of Best Available Control Technology (BACT)
  - Determination of Prevention of Significant Deterioration (PSD)
  - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)



PERMIT NO.: AC 54-43795  
APPLICANT: Georgia-Pacific Corporation

**SPECIFIC CONDITIONS:**

1. Construction shall reasonably conform to the plans and schedule given in the application and application amendments. The applicant shall report any delays in construction and completion of the project covered by this permit to the Department.
2. Reasonable precautions shall be taken by the applicant to prevent fugitive particulate emissions during construction and operation of the source.
3. Operation time will be 8760 hours per year.
4. Maximum capacity is 320 tons per day.
5. No. 6 Fuel Oil maximum consumption is 16.6 barrels per hour with a maximum heat input of  $102 \times 10^6$  Btu per hour. Maximum sulfur content is 2.5%.
6. Maximum allowable emissions are:

| <u>Pollutant</u>   | <u>Emission Limit</u>                                     | <u>Maximum Allowable Emissions</u><br><u>(lbs./hr.)</u> |
|--------------------|---|---|
| Particulate Matter | 0.13 grains/DSCF<br>(corrected to 10% oxygen)             | 29.31   |
| TRS                | 8 ppm. by volume on a dry basis (corrected to 10% oxygen) | 1.09  |
| VE                 | 20% maximum Opacity                                       |   |

7. To assure compliance of the emission limits imposed through BACT and New Source Performance Standards (NSPS), 40 CFR 60, Subpart BB, the applicant shall install, calibrate, maintain and operate a continuous monitoring system for measuring TRS.
8. Testing for emissions will be EPA reference methods 1, 2, 3, 5, 9 and 16 as in 40 CFR 60, Appendix A, or other state approved methods. Minimum sampling time and volume will be specified in NSPS for this type of source. Stack sampling facilities will include eyebolts and angle as described in the attached figure.

PERMIT NO.: AC 54-43795  
APPLICANT: Georgia-Pacific Corporation

9. Before the construction permit expires, the proposed lime kiln will be sampled for pollutant emissions as described in "Specific Condition No. 8".
10. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to St. Johns River Subdistrict Office prior to 90 days before the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or until issuance of an operating permit.
11. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the source. The report will include emission test data, emission test results, fuel consumption and composition, pH and pressure drop.

Expiration Date: December, 1985

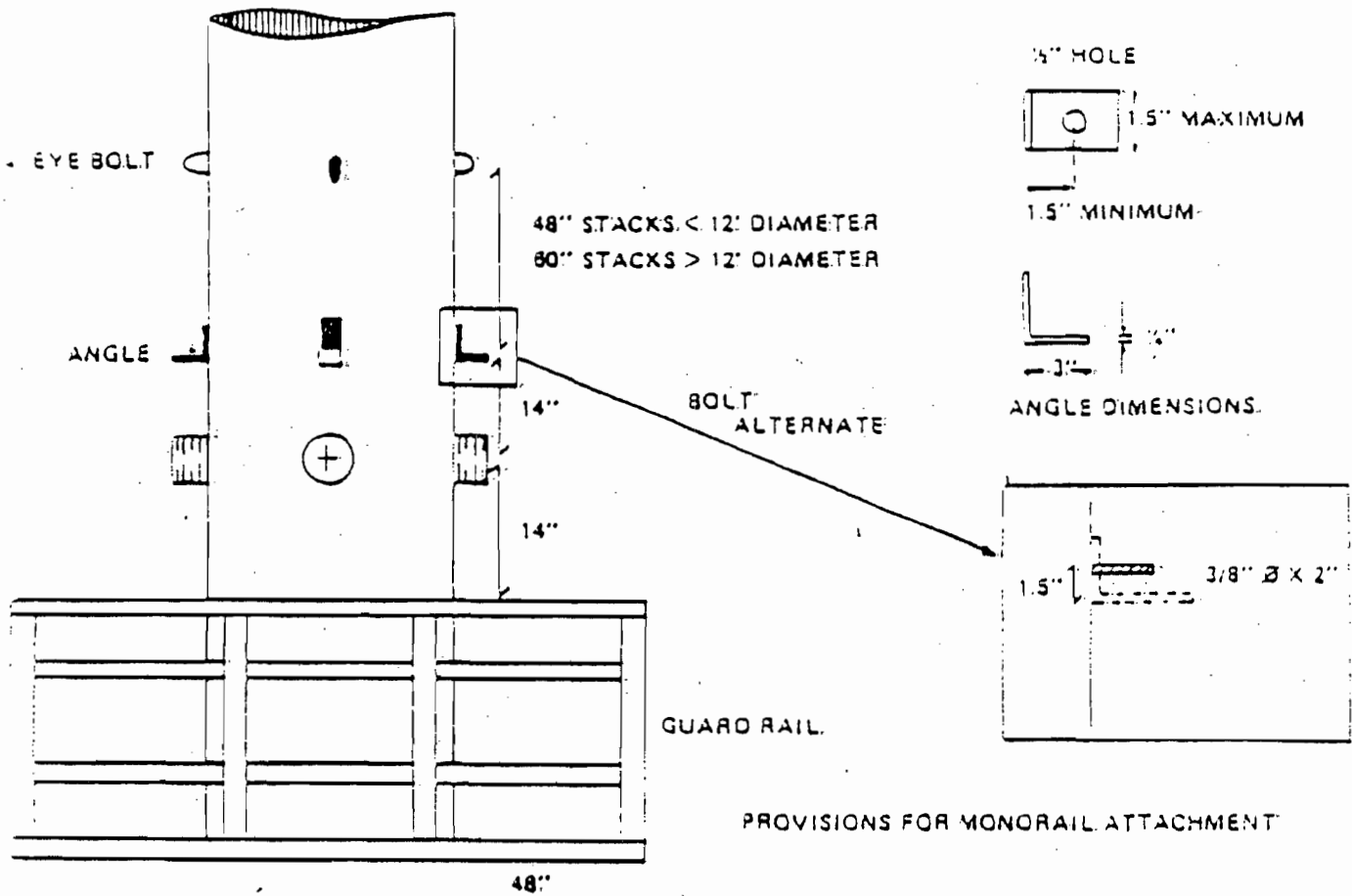
Issued this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

\_\_\_\_\_ Pages Attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Signature

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK I.B. WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



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**INTEROFFICE MEMORANDUM**

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

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

THRU: Clair Fancy  
Bill Thomas  
Larry George *LL*

FROM: Bruce Mitchell *BM*

DATE: August 28, 1981

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

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

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

The G-P mill is in an area designated attainment for all criteria pollutants. It is more than 50 km from any particulate matter (PM) or SO<sub>2</sub> nonattainment area and more than 100 km from any Class I area.

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

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

Since the proposed project is a physical change to an existing major emitting facility which would result in an increase in potential emissions of either PM or SO<sub>2</sub> over the baseline, it constitutes a modification subject to review under State prevention of significant deterioration (PSD) regulations (17-2.04(6), FAC). (In this case, potential emissions of both PM and SO<sub>2</sub> will increase, but only SO<sub>2</sub> concentrations will increase over the baseline. The post-1974 shut-down of lime kilns 1-3 and recovery boilers 1-3 at the mill have expanded the PSD increment such that PM emissions from the proposed project will not result in concentrations over the baseline). PSD review consists of a determination of best available control technology (BACT) for all pollutants emitted and an air quality impact analysis to demonstrate that the project would not cause or contribute to a violation of any ambient air quality standard or PSD increment.

In addition, the combination boiler is subject to a visible emissions (VE) standard and emission limiting standards for PM, SO<sub>2</sub>, and NO<sub>x</sub> under the adopted federal new source performance standards (NSPS) for fossil-fuel steam generators (17-2.21(2)(a), FAC). The BACT determination for these emissions from the boiler must be at least as stringent as the applicable NSPS. Although not yet adopted at the State level, the federal NSPS for kraft pulp mills (40 CFR 60.280, Subpart BB) will be considered in the BACT determination for PM and TRS emissions from the recovery boiler, smelt tanks and lime kiln.

Page Three  
August 28, 1981

APPROVED:

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

B. Thomas                      9/15/81  
B. Thomas                      DATE

C. Fancy                      9/21/81  
C. Fancy                      Date

BM: jr

cc: J. Ketteringham

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

July 2, 1981

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

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

Dear Mr. Sherwood:

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

SO<sub>2</sub> Short-Term Analysis

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

Mr. Roger Sherwood  
Page Two  
July 2, 1981

TSP Short-Term Analysis

- o On the five-year 1SCST runs, source group #3 should have included source #'s 17-20, not #17 alone.

Long-Term Analysis

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

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

Sincerely,

*[Handwritten signature]*

*[Handwritten initials]*  
Steve Smallwood, P.E.  
Chief  
Bureau of Air Quality Management

SS:LG:caa

cc: J. Cole, St. Johns River Subdistrict





Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

June 30, 1981

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

Dear Mr. Mitchell:

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

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

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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





Georgia-Pacific Corporation

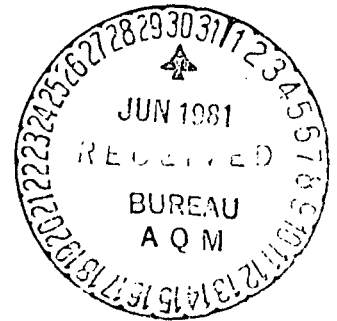
Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

June 26, 1981

*John*

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



Dear Mr. Fancy:

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

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

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

Sincerely,

Vernon L. Adams  
Supervisor of  
Environmental Affairs

mg

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

AC 54-43773  
54-43791  
54-43795

PSD - FL-079



**Georgia-Pacific Corporation**

Hudson Pulp & Paper Corp.  
A wholly-owned subsidiary

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

June 1, 1981

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



Dear Mr. Smallwood:

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

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

Sincerely,

Roger C. Sherwood  
Technical Director

mg  
enclosures

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000043773 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH  
FILE NAME:GA-PACIFIC CORP DATE FIRST REC: 06/02/81 APPLICATION TYPE:AC  
APPL NAME:R. C. SHERWOOD APPL PHONE:(904)325-2001 PROJECT COUNTY:54  
ADDR:P. O. BOX 919 CITY:PALATKA ST:FLZIP:32077  
AGNT NAME:BUFF AGNT PHONE:(904)372-3318  
ADDR:P. O. BOX ESE CITY:GAINESVILLE ST:FLZIP:32604

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

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

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

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

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000043791 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH  
FILE NAME:GA-PACIFIC DATE FIRST REC: 06/02/81 APPLICATION TYPE:AC  
APPL NAME:R. C. SHERWOOD APPL PHONE:(904)325-2001 PROJECT COUNTY:54  
ADDR:P. O. BOX 919 CITY:PALATKA ST:FLZIP:32077  
AGNT NAME:DAVID BUFF AGNT PHONE:(904)372-3318  
ADDR:P. O. BOX ESE CITY:GAINESVILLE ST:FLZIP:32604

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

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

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

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

Best Available Copy

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000043795 COF# DER PROCESSOR: THOMAS DER OFFICE: TLH  
 FILE NAME: GA-PACIFIC DATE FIRST REC: 06/02/84 APPLICATION TYPE: AC  
 APPL NAME: SHERWOOD APPL PHONE: ( ) - PROJECT COUNTY: 54  
 ADDR: CITY: ST: ZIP:  
 AGNT NAME: AGNT PHONE: ( ) - ST: ZIP:  
 ADOR: CITY: ST: ZIP:

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

HEARING REQUEST DATES: / / / / / / / / / / / / / / / /  
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / / / / / / / / / / / /  
 HEARING ORDER OR FINAL ACTION DUE DATE: / / / / / / / / / / / / / / / /

THIS RECORD HAS BEEN SUCCESSFULLY ADDED 06/02/84 16:49:55

FEE PD DATE#1: 06/02/84 \$6020 RECEIPT#00003573 REFUND DATE: / / REFUND \$  
 FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$  
 APPL: ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED: AC DATE: 06/02/84  
 REMARKS: RECOVERY BOILER NO. 5

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

Distribution:

- Ed. Delaney ✓
- ~~copy to Palm Beach Co. Health Dept~~
- ~~copy to DER - St. Johns River Subdistrict~~
- review engineer ✓
- meteorologist ✓
- CAPS file ✓

More copies made ~~10~~ 10:

- ~~Ed. Delaney~~
- ~~P.B. County Health Dept.~~
- DER St. Johns River Subdist.
- 2 P.W. - state
- C.F.
- E.E.N. Fed

Georgia Pacific

5/18/81

proposed 1200 tpd pulp expansion phone

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

See PSD-FL-079

for complete copy

No. 33573

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Georgia-Pacific Corporation Date June 2, 1981

Address P.O. Box 11151, Palm Beach, FL 33407 Dollars \$ 600.00

Applicant Name & Address (above)

Source of Revenue 70101

Revenue Code 43773 Application Number AC 54-43773

By James Powell 43773 43773

Start CAPS hanging file:

{ Georgia-Pacific Corp. }  
 { Palatka }

Handwritten notes on the right side of the page, including "Palatka", "Georgia-Pacific", and "CAPS".

1-1-11

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

**INTEROFFICE MEMORANDUM**

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

TO: Steve Smallwood  
Mary Clark

FROM: John Svec *JS*

DATE: February 10, 1981

SUBJ: Bubble Proposal of Georgia Pacific Company - Palatka Plant

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

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

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

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

JS:dav



John Socc  
File  
Bubble

X Ga Pacific?

FILE #

New file  
for bubble applications