



Palatka Pulp and Paper Operations  
Consumer Products Division

P.O. Box 919  
Palatka, FL 32178-0919  
(386) 325-2001

April 10, 2008

RECEIVED

APR 14 2008

BUREAU OF AIR REGULATION

Mr. Jeffery F. Koerner, Air Permitting North Section  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: #4 Recovery Boiler "Consumed Air" Process Control System Project  
Project No. ~~1070005-038-AC~~ PSD-FL-380

*1070005-053-AE*

Dear Mr. Koerner:

Enclosed for your review is a construction permit application (four copies) for the referenced project that was discussed in a recent conference call between you, Bruce Mitchell of DEP, Mike Curtis, Wayne Galler, and Ron Reynolds of G-P. The "Consumed Air" control system should improve the steam generation efficiency of the boiler by optimizing the air-to-fuel ratio. G-P is not requesting any increase in black liquor solids (BLS) firing rate or permitted emissions rates as a result of this project. G-P is requesting that DEP incorporate this project into the PSD-380 permit issued May 29, 2007.

If there are any questions regarding this response, please do not hesitate to contact Mike Curtis at 386-329-0918.

Sincerely,

Keith W. Wahoske, Vice-President  
Palatka Operations

Enclosure

Cc: W. Galler, T. Champion, T. Wyles, S. Matchett, M. Curtis - GP



# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED

APR 14 2008

#### I. APPLICATION INFORMATION

BUREAU OF AIR REGULATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**  
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>Georgia-Pacific Consumer Operations LLC</b>	
2. Site Name: <b>Palatka Mill</b>	
3. Facility Identification Number: <b>1070005</b>	
4. Facility Location...: Street Address or Other Locator: <b>215 County Road # 216</b> City: <b>Palatka</b> County: <b>Putnam</b> Zip Code: <b>32177</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Michael W. Curtis, Superintendent of Environmental Services</b>		
2. Application Contact Mailing Address... Organization/Firm: <b>Georgia-Pacific Consumer Operations LLC</b> Street Address: <b>P.O. BOX 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178-0919</b>		
3. Application Contact Telephone Numbers... Telephone: <b>(386) 325-2001</b> ext. Fax: <b>(386) 328-0014</b>		
4. Application Contact Email Address: <b>michael.curtis@gapac.com</b>		

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application: <b>4/14/08</b>	
2. Project Number(s): <b>1070005-653-AL</b>	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application: Installation of Consumed Air Control System for No. 4 Recovery Boiler****This application for air permit is submitted to obtain: (Check one)****Air Construction Permit** Air construction permit.**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit  
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

**Installation of Consumed Air Control System for No. 4 Recovery Boiler:** The Mill is proposing to install a "Consumed Air" process control system for the No. 4 Recovery Boiler. The process control system will be supplied by DES Global, LLC of Greenville, South Carolina. The purpose for installing the control system is to make the boiler more efficient by generating more steam from each pound of black liquor solids burned in the boiler. Currently, black liquor flow is controlled as a constant volumetric feed rate to the boiler. Combustion air is fixed at a desired set point at each of the four levels in the boiler. Variations in black liquor solids content, black liquor temperature, black liquor heating value and excess air are not taken into account with the present control system. This causes variations in the combustion process. The combustion variability shows up in the amount of steam produced per pound of black liquor solids fired in the boiler.

The proposed new control package will reduce variation in the combustion process and increase steam generation per pound of black liquor solids. The consumed air control strategy consists of increasing or decreasing the amount of black liquor fuel supplied to the boiler to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. The project is expected to increase steam generation by approximately 6,000 pounds per hour for the same black liquor firing rate.

The consumed air control system works as discussed in the extract below that was taken from a paper presented at a TAPPI Conference in 1997 by Dynamic Energy Systems. The paper was written about experiences with a boiler at an industrial manufacturing complex other than the Palatka Mill:

"The recovery boiler liquor firing strategy provides stable heat input. A consumed air model combines total air and flue gas oxygen measurements to compute the amount of air used, or consumed, in black liquor combustion. The model compensates for air used by auxiliary fuel and for infiltration air. From the data, the heat input is inferred and used to set liquor flow. Air being consumed is continuously calculated and used to adjust liquor flow to the furnace in order to maintain a heat release that corresponds to the air consumed and excess air. Once heat input stability is achieved, there is a significant reduction in the standard deviation of all process variables.

The control system maintains a constant air flow to the furnace that is a function of boiler load while constantly adjusting liquor flow. The control strategy further provides automatic adjustment of the total air flow and air splits to the primary, secondary, and tertiary levels when the firing rate is changed. As load is reduced, the control set point for oxygen is automatically adjusted upward so that an ideal amount of air is available for combustion at all times. The recovery boiler was equipped with two oxygen meters, one on each side of the economizer outlet. Control is governed by the lowest of these recorded values. Mill rationale for selecting the lowest reading recognizes that a failed analyzer could send the recorded oxygen to the high level of the meter range which would be recognized by the control system as an indication of too much air being used. With the lowest value, there is a reduced probability of having insufficient air for combustion when an oxygen analyzer problem occurs.

Automatic control of the boiler is operator friendly. The "Single knob control" functionality provides operators with a single input interface for changing the recovery boiler load. All other adjustments are automatic based on the load selected. To change load, the operator types an input of the desired new load. With this one input, the computer control system smoothly and precisely ramps liquor flow and air supply to the new load conditions without operator intervention. The throughput change is ramped at a fixed programmed rate determined during start-up. The smooth, ramped load change minimizes drum level, steam header, and furnace pressure upsets. The gradual change further provides furnace stability as load is adjusted to minimize turbulence and carryover that can frequently occur where liquor load is changed and air controls are not."

The Mill is not implementing this project to increase black liquor solid flow through the boiler. Currently, the unit routinely operates at 98% of the 24-hour average permitted capacity. Experience with the control system has resulted in increased black liquor throughput in some instances at other pulp and paper mills. However, we do not believe this will be the case in Palatka. The Mill will not be changing the maximum black liquor solids firing rate or the potential-to-emit emission rates for the No. 4 Recovery Boiler as a result of implementing this project. For this reason, the Mill is requesting the Florida Department of Environmental Protection to incorporate this project into the recently issued PSD permit for the No. 4 Recovery Boiler that was issued on May 29, 2007.

**APPLICATION INFORMATION**

**No. 4 Recovery Boiler  
Palatka, Fl Mill April 2008**

**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
<b>018</b>	<b>No. 4 Recovery Boiler</b>	<b>AC1A</b>	<b>*</b>

**Application Processing Fee**

\*Previously paid to state

Check one:  Attached - Amount:  Not Applicable

**Owner/Authorized Representative Statement****Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name : <b>Keith W. Wahoske, Vice President Manufacturing</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>Georgia-Pacific Consumer Products LLC</b> Street Address: <b>P.O. BOX 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(386) 329-0063</b> ext. Fax: <b>(386) 328-0014</b>
4. Owner/Authorized Representative Email Address: <b>keith.wahoske@gapac.com</b>
5. Owner/Authorized Representative Statement: <p><i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i></p> <p><u>Keith Wahoske</u> Signature</p> <p><u>4/11/08</u> Date</p>

**Application Responsible Official Certification**

**Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”**

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span>City:</span> <span>State:</span> <span>Zip Code:</span> </div>
4. Application Responsible Official Telephone Numbers... Telephone: (    ) -                      ext.                      Fax:    (    ) -
5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

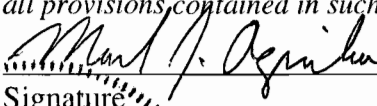
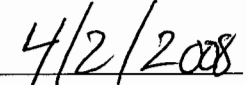
I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Keith Wabosh  
Signature

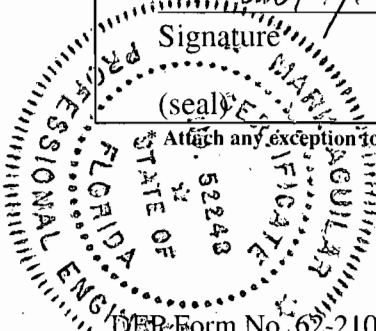
4/11/08  
Date



**Professional Engineer Certification**

1. Professional Engineer Name: <b>Mark J. Aguilar</b> Registration Number: <b>52248</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Georgia-Pacific LLC</b> Street Address: <b>133 Peachtree Street, NE</b> City: <b>Atlanta</b> State: <b>GA</b> Zip Code: <b>30303</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(404) 652-4293</b> ext. Fax: <b>(404) 654-4706</b>
4. Professional Engineer Email Address: <b>mjaguila@gapac.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i>  (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i>  (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i>  (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i>  (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>   _____ Signature  _____ Date

Attach any exception to certification statement. \*\* Board of Professional Engineers Certificate of Authorization # 00001670



II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone <b>17</b> East (km) <b>434.0</b> North (km) <b>3283.4</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) <b>29/41/0</b> Longitude (DD/MM/SS) <b>81/40/45</b>	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>26</b>	6. Facility SIC(s): <b>2611, 2621</b>
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: <b>Michael W. Curtis, Superintendent of Environmental Services</b>			
2. Facility Contact Mailing Address... Organization/Firm: <b>Georgia-Pacific Consumer Products LLC</b> Street Address: <b>P.O. BOX 919</b> City: <b>Palatka</b> State: <b>FL</b> Zip Code: <b>32178-0919</b>			
3. Facility Contact Telephone Numbers: Telephone: <b>(386) 329-0918 ext.</b> Fax: <b>(386) 328-0014</b>			
4. Facility Contact Email Address: <b>michael.curtis@gapac.com</b>			

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:			
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:			
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -			
4. Facility Primary Responsible Official Email Address:			

**Facility Regulatory Classifications**

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	



Palatka Pulp and Paper Operations  
Consumer Products Division

P.O. Box 919  
Palatka, FL 32178-0919  
(386) 325-2001

July 8, 2008

**RECEIVED**

JUL 11 2008

**BUREAU OF AIR REGULATION**

Mr. Jeffery F. Koerner, Air Permitting N Section  
Bureau of Air Regulation  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Georgia-Pacific, Palatka Operations  
Draft Permit Project No. 1070005-053-AC  
PSD-FL-380(B)

Dear Mr. Koerner:

Please find enclosed Proof of Publication of Public Notice for Intent for draft Title V Air Operation Permit No. 1070005-053-AC to install a consumed air process control system on the No. 4 Recovery Boiler.

If further information is needed, please contact me at (386) 329-0967.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Reynolds".

Ron Reynolds  
Environmental Air Engineer

tk

Enclosure

cc: B. T. Champion, GP Atlanta  
Scott Matchett, GP Atlanta

Florida Department of  
Environmental Protection

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**Memorandum**

TO: Trina Vielhauer, Chief - Bureau of Air Regulation  
THROUGH: Jeff Koerner, Administrator, New Source Review Section *JK*  
FROM: Bruce Mitchell *BM*  
DATE: June 11, 2007  
SUBJECT: Draft Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Georgia-Pacific Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination (with BACT Determination);
- Draft PSD Permit Revision; and
- P.E. Certification

The P.E. certification briefly summarizes the proposed permit project. The Technical Evaluation and Preliminary Determination provide a detailed description of the project, rationale, and conclusion. I recommend your approval of the attached Draft Permit for this project.

Attachments



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

June 20, 2008

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

Re: Draft Air Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Georgia-Pacific Consumer Operations LLC – Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

Dear Mr. Wahoske:

On April 14, 2008, you submitted an application requesting authorization to install a “Consumed Air” process control system for the No. 4 Recovery Boiler at the Palatka Mill. This facility is located North of CR 216 and West of US 17 in Palatka, Putnam County, Florida. Enclosed are the following documents:

- Technical Evaluation and Preliminary Determination;
- Draft Permit Revision and Appendices;
- Written Notice of Intent to Issue Air Permit Revision; and
- Public Notice of Intent to Issue Air Permit Revision.

The Public Notice of Intent to Issue Air Permit Revision is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,

A handwritten signature in black ink that reads 'Trina Vielhauer'.

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

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*In the Matter of an*

*Application for Air Permit Revision by:*

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

*Authorized Representative:*

Mr. Keith Wahoske  
Vice President – Palatka Operations

Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project  
Putnam County, Florida

**Facility Location:** Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

**Project:** The applicant proposes to install a new automated control system to make the No. 4 Recovery Boiler more efficient in order to generate more steam from each pound of black liquor solids burned in the boiler. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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

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

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

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

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

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forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit Revision. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit Revision, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit Revision. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation



**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION**

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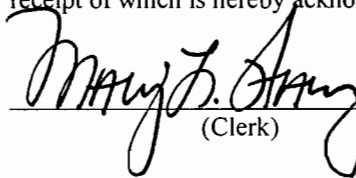
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 6/20/08 to the persons listed below.

- Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))
- Mr. Christopher Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))
- Mr. Dee Morse, National Park Service ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

Clerk Stamp

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

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

6/20/08  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Project No. 1070005-053-AC  
Draft Air Permit Revision No. PSD-FL-380(B)  
Georgia-Pacific Consumer Operations LLC – Palatka Mill  
Putnam County, Florida

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

**Facility Location:** Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

**Project:** The applicant requests authorization to install a "Consumed Air" process control system on the No. 4 Recovery Boiler to improve combustion and efficiency of the unit. The proposed new control package will reduce variation in the combustion process by increasing and decreasing the amount of black liquor solids (BLS) to the boiler to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. Air permit No. PSD-FL-380(A) will be revised to include this minor change.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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

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

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

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to

**(Public Notice to be Published in the Newspaper)**

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT REVISION

the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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**Mediation:** Mediation is not available for this proceeding.

**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Draft Air Construction Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
No. 4 Recovery Boiler, Consumed Air Project

**COUNTY**

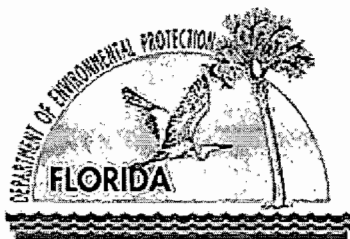
Putnam County

**APPLICANT**

Georgia-Pacific Consumer Operations LLC  
Palatka Mill  
ARMS Facility ID No. 1070005

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section



June 20, 2008

*{Filename: 1070005.053.AC.PSD.FL.380(B).TEPD}*

## 1. GENERAL PROJECT INFORMATION

### Facility Description and Location

The facility is an existing pulp and paper mill, which is categorized under Standard Industrial Classification Code SIC Nos. 2611 and 2621. The UTM coordinates are Zone 17, 434.0 km East, and 3283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS) pursuant to Chapter 62-204, Florida Administrative Code (F.A.C.).

### Facility Regulatory Categories

Title III: The existing facility is identified as a potential major source of hazardous air pollutants (HAP).

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

### Project Description

The applicant requested authorization to install a "Consumed Air" process control system on the existing No. 4 Recovery Boiler. The purpose is to make the boiler more efficient in order to generate more steam from each pound of black liquor solids burned in the boiler. The project is expected to increase steam generation by approximately 6,000 pounds per hour for the same black liquor firing rate.

Currently, black liquor flow is controlled as a constant volumetric feed rate to the boiler. Combustion air is fixed at a desired set point at each of the four levels in the boiler. Variations in black liquor solids content, black liquor temperature, black liquor heating value and excess air are not taken into account with the present control system, which has caused variations in the combustion process. The combustion variability shows up in the amount of steam produced per pound of black liquor solids fired in the boiler.

The proposed new control package will reduce variation in the combustion process and increase steam generation per pound of black liquor solids. The consumed air control system strategy consists of increasing or decreasing the amount of black liquor fuel supplied to the boiler in order to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. The boiler will be equipped with two oxygen meters, one on each side of the economizer outlet, with control governed by the lowest of the recorded values. Mill rationale for selecting the lowest reading recognizes that a failed analyzer could send the recorded oxygen to the highest level of the meter's range, which would be recognized by the control system as an indication of too much air being used. By using the lowest reading, there is a reduced probability of having insufficient air for combustion when an oxygen analyzer problem occurs.

Automatic control of the boiler is operator friendly. The "single knob control" functionality provides operators with a single input interface for changing the recovery boiler load. All other adjustments are automatic based on the load selected. To change load, the operator types in an input of the desired load and the control system smoothly and precisely ramps liquor flow and air supply to the new load conditions without operator intervention. The throughput change is ramped at a fixed programmed rate determined during start-up. The smooth, ramped load change minimizes drum level, steam header, and furnace pressure upsets. The gradual change further provides furnace stability as load is adjusted to minimize turbulence and carryover that can frequently occur where liquor is changed and air controls are not.

Since the recovery boiler has been routinely operating at 98% of the 24-hour average permitted capacity, then there is no anticipated increase in this capacity of black liquor solids throughput. This minor change will be implemented with the other proposed work to modify the No. 4 Recovery Boiler in Permit No. PSD-FL-380(A).

**Processing Schedule**

April 14, 2008: Received the application for a minor source air pollution construction permit; and application deemed complete.

**2. APPLICABLE REGULATIONS**

**State Regulations**

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the F.A.C. This project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards <sup>1</sup>
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

<sup>1</sup> Rule 62-296.404, F.A.C.: Kraft Pulp Mills

**Federal Regulations**

The existing No. 4 Recovery Boiler is subject to the federal provisions of 40 Code of Federal Regulations (CFR) 63, Subpart S, National Emissions Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry, and Subpart MM, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfitic, and Stand-Alone Semichemical Pulp Mills. These applicable provisions are listed in the current Title V Permit, No. 1070005-048-AV, and will not be repeated.

**General PSD Applicability**

The Department regulates major air pollution sources in accordance with Florida's PSD program, pursuant to Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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quality impacts. Although a facility may be “major” with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

### **PSD Applicability for Project**

This project is considered a minor revision of Permit No. PSD-FL-380 and will not result in any emissions increases. Therefore, the project is not subject to PSD preconstruction review. Once the No. 4 Recovery Boiler is modified, carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) emissions will be continuously monitored to ensure efficient combustion as well as compliance with the new standards.

### **3. EMISSIONS STANDARDS**

#### **Draft Permit Requirements**

The previously issued permit will be revised to include the authorization to install the “Consumed Air” process control system on the existing No. 4 Recovery Boiler.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Bruce Mitchell is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department’s Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**DRAFT**

**NOTICE OF PERMIT REVISION**

In the Matter of an  
Application for Permit by:

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

Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

*Authorized Representative:*

Mr. Keith Wahoske, Vice President – Palatka Mill Operations

Georgia-Pacific Consumer Operations LLC operates the Palatka Mill in Putnam County located North of CR 216 and West of US 17 in Palatka, Florida. This draft air construction permit revision amends the original Permit No. PSD-FL-380 (Project No. 1070005-038-AC) and authorizes the installation of a new automated consumed air control system to improve combustion and efficiency of the No. 4 Recovery Boiler. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

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

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

JK/tlv/jfk/bm



**PERMIT REVISION**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Permit Revision (including the Draft Permit Revision) was sent by electronic mail with received receipt requested to the persons listed below.

- Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))
- Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))
- Mr. Christopher Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))
- Mr. Dee Morse, National Park Service ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

Clerk Stamp

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

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

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

## PERMIT REVISION

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This permit revision modifies original Permit No. PSD-FL-380 (Project No. 1070005-038-AC).

The following permit conditions are revised as follows. Deleted text is marked by ~~striethrough~~ and new text is marked with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

### Section 3. Emissions Unit Specific Conditions. Subsection D. No. 4 Recovery Boiler.

4. No. 4 Recovery Boiler Modifications: The permittee is authorized to perform the following modifications to the No. 4 Recovery Boiler in accordance with the following preliminary schedule: modify the combustion air system; add a fourth level of overfire air (quaternary air); ~~and~~ replace tubes in the superheater, economizer, and walls of the recovery boiler; and install a "Consumed Air" process control system. These changes will not increase the existing permitted capacity of the recovery boiler or the pulp mill. The preliminary schedule is to begin construction in May of 2007. [Application No. 1010005-038-AC; Rules 62-212.300 and 62-212.400 (PSD), F.A.C.; PSD-FL-380; and PSD-FL-380(B)]

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Attachments:** 1070005.053.AC.D\_pdf.zip

Tracking:	Recipient	Delivery	Read
	'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'		
	'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'		
	'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'		
	'Mr. David Buff, P.E., Golder Associates, Inc.'		
	Kirts, Christopher	Delivered: 6/20/2008 2:52 PM	Read: 6/23/2008 8:14 AM
	'Ms. Kathleen Forney, U.S. EPA, Region 4'		
	'Mr. Dee Morse, National Park Service'		
	Mitchell, Bruce	Delivered: 6/20/2008 2:52 PM	
	Walker, Elizabeth (AIR)	Delivered: 6/20/2008 2:52 PM	
	Gibson, Victoria	Delivered: 6/20/2008 2:52 PM	Read: 6/20/2008 2:59 PM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

6/23/2008

## Harvey, Mary

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** undisclosed-recipients  
**Sent:** Friday, June 20, 2008 5:31 PM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

**To:** DBuff@GOLDER.com  
**Subject:**

was read on 6/20/2008 5:31 PM.

**Harvey, Mary**

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**Sent:** Saturday, June 21, 2008 12:49 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

David A. Buff, P.E., Q. E. P.  
Golder Associates Inc.  
Phone: (352)336-5600 x 545  
Fax: (352)336-6603 Mobile: (352)514-5600  
E-Mail: [dbuff@golder.com](mailto:dbuff@golder.com)

**Disclaimer Notice:**

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---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC; Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC; Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC; Buff, Dave; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

6/23/2008

## Harvey, Mary

---

**From:** Kirts, Christopher  
**To:** Harvey, Mary  
**Sent:** Monday, June 23, 2008 8:14 AM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

### Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Sent:** 6/20/2008 2:51 PM

was read on 6/23/2008 8:14 AM.



## Harvey, Mary

---

**From:** Dee\_Morse@nps.gov  
**Sent:** Monday, June 23, 2008 11:29 AM  
**To:** Harvey, Mary  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

### Return Receipt

Your Georgia-Pacific Consumer Operations - 1070005-053A  
document:

was Dee Morse/DENVER/NPS  
received  
by:

at: 06/23/2008 09:27:10 AM MDT

## Harvey, Mary

---

**From:** Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]  
**To:** Harvey, Mary  
**Sent:** Monday, June 23, 2008 9:26 AM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

Your message

**To:** MICHAEL.CURTIS@GAPAC.com  
**Subject:**

was read on 6/23/2008 9:26 AM.



**Harvey, Mary**

---

**From:** Gibson, Victoria  
**Sent:** Friday, June 20, 2008 3:00 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

Thank you.....and have great weekend.

Vickie

---

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:59 PM  
**Subject:** Read: Georgia-Pacific Consumer Operations - 1070005-053A

### Your message

**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A  
**Sent:** 6/20/2008 2:51 PM

was read on 6/20/2008 2:59 PM.

## Harvey, Mary

---

**From:** Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]  
**Sent:** Friday, June 20, 2008 2:59 PM  
**To:** Harvey, Mary; Curtis, Michael; Aguilar, Mark J.; Mr. David Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

We are in receipt of your Email.

Keith Wahoske

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

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** Wahoske, Keith; Curtis, Michael; Aguilar, Mark J.; Mr. David Buff, P.E., Golder Associates, Inc.; Kirts, Christopher; Ms. Kathleen Forney, U.S. EPA, Region 4; Mr. Dee Morse, National Park Service  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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

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Thank you,

DEP, Bureau of Air Regulation

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

6/20/2008

**Harvey, Mary**

---

**From:** Mitchell, Bruce  
**Sent:** Friday, June 20, 2008 3:24 PM  
**To:** Harvey, Mary  
**Subject:** RE: Georgia-Pacific Consumer Operations - 1070005-053A

Many thanks, Mary, for handling the processing of the mail out! Take care and have a great week-end.

Bruce

---

**From:** Harvey, Mary  
**Sent:** Friday, June 20, 2008 2:51 PM  
**To:** 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, P.E., Golder Associates, Inc.'; Kirts, Christopher; 'Ms. Kathleen Forney, U.S. EPA, Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Mitchell, Bruce; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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

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Thank you,

DEP, Bureau of Air Regulation

6/20/2008

## Harvey, Mary

---

**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Monday, June 23, 2008 11:18 AM  
**To:** Harvey, Mary  
**Cc:** Kelley, Tracey S.  
**Subject:** Georgia-Pacific Consumer Operations - 1070005-053A

Please forward the Public Notice of Intent document in Microsoft Word format so that we can proceed with publication in the local newspaper.

Best regards,

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

6/23/2008

## Memorandum

# Florida Department of Environmental Protection

---

TO: Joe Kahn, Director, Division of Air Resource Management  
THROUGH: Trina Vielhauer, Chief - Bureau of Air Regulation  
THROUGH: Jeff Koerner, Administrator, New Source Review Section  
FROM: Bruce Mitchell *BM*  
DATE: July 23, 2008  
SUBJECT: Final Air Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Georgia-Pacific Palatka Mill  
No. 4 Recovery Boiler, Consumed Air Project

The Final PSD Permit Revision for this project is attached for your signature, which authorizes the installation of a "Consumed Air" process control system on the existing No. 4 Recovery Boiler. There were no comments received during the Public Notice period.

I recommend your approval of the attached Final Permit for this project.

Attachments

## FINAL DETERMINATION

---

### PERMITTEE

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

### PERMITTING AUTHORITY

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

### PROJECT

Air PSD Permit Revision No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill

This project authorizes the installation of a "Consumed Air" process control system on the existing No. 4 Recovery Boiler. The purpose is to make the boiler more efficient in order to generate more steam from each pound of black liquor solids burned in the boiler. The project is expected to increase steam generation by approximately 6,000 pounds per hour for the same black liquor firing rate. The equipment modifications will be made at the existing Palatka Mill located North of CR 216 and West of US 17, in Palatka, Putnam County, Florida. The project results in a minor air construction permit revision.

### NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on June 20, 2008. The applicant published the "Public Notice of Intent to Issue" in the Palatka Daily News on July 5, 2008. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. There were no comments received during the Public Notice period.

### CONCLUSION

The final action of the Department is to issue the permit as described above.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**NOTICE OF PERMIT REVISION**

In the Matter of an  
Application for Permit by:

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

Air Permit No. PSD-FL-380(B)  
Project No. 1070005-053-AC  
Palatka Mill  
No. 4 Recovery Boiler, Consumed Air  
Project

*Authorized Representative:*

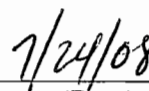
Mr. Keith Wahoske, Vice President – Palatka Mill Operations

Georgia-Pacific Consumer Operations LLC operates the Palatka Mill in Putnam County located North of CR 216 and West of US 17 in Palatka, Florida. This final air construction permit revision amends the original Permit No. PSD-FL-380 (Project No. 1070005-038-AC) and authorizes the installation of a new automated consumed air control system to improve combustion and efficiency of the No. 4 Recovery Boiler. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

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

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

JK/tlv/jfk/bm



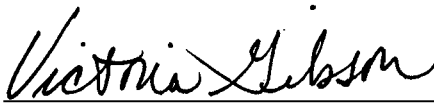
**CERTIFICATE OF SERVICE**


The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Permit Revision (including the Final Permit Revision) was sent by electronic mail with received receipt requested to the persons listed below.

Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC ([keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com))  
Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))  
Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))  
Mr. David Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))  
Mr. Christopher Kirts, Northeast District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))  
Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))  
Mr. Dee Morse, National Park Service ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

Clerk Stamp

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

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

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

## PERMIT REVISION

---

**This permit revision modifies original Permit No. PSD-FL-380 (Project No. 1070005-038-AC).**

The following permit condition is revised as follows. Deleted text is marked by ~~striketrough~~ and new text is marked with double underline. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

**Section 3. Emissions Unit Specific Conditions. Subsection D. No. 4 Recovery Boiler.**

4. No. 4 Recovery Boiler Modifications: The permittee is authorized to perform the following modifications to the No. 4 Recovery Boiler in accordance with the following preliminary schedule: modify the combustion air system; add a fourth level of overfire air (quaternary air); ~~and~~ replace tubes in the superheater, economizer, and walls of the recovery boiler; and install a "Consumed Air" process control system. These changes will not increase the existing permitted capacity of the recovery boiler or the pulp mill. The preliminary schedule is to begin construction in May of 2007. [Application No. 1010005-038-AC; Rules 62-212.300 and 62-212.400 (PSD), F.A.C.; PSD-FL-380; and PSD-FL-380(B)]

## Walker, Elizabeth (AIR)

---

**From:** Walker, Elizabeth (AIR)  
**Sent:** Thursday, July 24, 2008 5:30 PM  
**To:** 'keith.wahoske@gapac.com'; 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; 'Mr. David A. Buff, P.E., Golder Associates, Inc.'  
**Cc:** Kirts, Christopher; 'Forney.Kathleen@epamail.epa.gov'; 'dee\_morse@nps.gov'; Gibson, Victoria; Mitchell, Bruce  
**Subject:** Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))  
**Attachments:** 1070005-053-AC.pdf

Dear Sir/Madam:

**Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).**

This is the official notification of the Final Permit Issuance for the following project:

**Owner/Company Name:** Georgia-Pacific Consumer Operations LLC  
**Facility Name:** Palatka Pulp & Paper Mill  
**Project Number:** 1070005-053-AC  
**Project Description:** No. 4 Recovery Boiler, Consumed Air Project  
**PSD Permit Number:** PSD-FL-380(B)

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If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

Tracking:

**Recipient**

'keith.wahoske@gapac.com'

'michael.curtis@gapac.com'

'mjaguila@gapac.com'

'Mr. David A. Buff, P.E., Golder Associates, Inc.'

Kirts, Christopher

'Forney.Kathleen@epamail.epa.gov'

'dee\_morse@nps.gov'

Gibson, Victoria

Mitchell, Bruce

**Delivery**

Delivered: 7/24/2008 5:30 PM

Delivered: 7/24/2008 5:30 PM

Delivered: 7/24/2008 5:30 PM

**Walker, Elizabeth (AIR)**

---

**From:** System Administrator  
**To:** Kirts, Christopher; Gibson, Victoria; Mitchell, Bruce  
**Sent:** Thursday, July 24, 2008 5:30 PM  
**Subject:** Delivered:Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

Your message

**To:** 'keith.wahoske@gapac.com'; 'michael.curtis@gapac.com'; 'mjaguila@gapac.com'; Mr. David A. Buff, P.E., Golder Associates, Inc.  
**Cc:** Kirts, Christopher; 'Forney.Kathleen@epamail.epa.gov'; 'dee\_morse@nps.gov'; Gibson, Victoria; Mitchell, Bruce  
**Subject:** Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))  
**Sent:** 7/24/2008 5:30 PM

was delivered to the following recipient(s):

Kirts, Christopher on 7/24/2008 5:30 PM  
Gibson, Victoria on 7/24/2008 5:30 PM  
Mitchell, Bruce on 7/24/2008 5:30 PM

**Walker, Elizabeth (AIR)**

---

**From:** Exchange Administrator  
**Sent:** Thursday, July 24, 2008 5:30 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Delivery Status Notification (Relay)  
**Attachments:** ATT109938.txt; Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

[dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)

## Walker, Elizabeth (AIR)

---

**From:** Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]  
**Sent:** Thursday, July 24, 2008 5:30 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250  
OK, sent 4888F460\_25366\_10192\_1 0184E2D4010

## Walker, Elizabeth (AIR)

---

**From:** Mail Delivery System [MAILER-DAEMON@sophos.golder.com]  
**Sent:** Thursday, July 24, 2008 5:30 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host sophos.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<[dbuff@golder.com](mailto:dbuff@golder.com)>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent  
4888F461\_21979\_94\_3 1013B11290A8



## Walker, Elizabeth (AIR)

---

**From:** Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]  
**Sent:** Thursday, July 24, 2008 6:45 PM  
**To:** Walker, Elizabeth (AIR); Curtis, Michael; Aguilar, Mark J.; dbuff@golder.com  
**Cc:** Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; dee\_morse@nps.gov; Gibson, Victoria; Mitchell, Bruce  
**Subject:** Re: Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

We are in receipt of this Email  
Keith Wahoske  
Vice President  
Port Hudson Operations  
(225) 654-1861

---

**From:** Walker, Elizabeth (AIR)  
**To:** Wahoske, Keith; Curtis, Michael; Aguilar, Mark J.; Mr. David A. Buff, P.E., Golder Associates, Inc.  
**Cc:** Kirts, Christopher ; Forney.Kathleen@epamail.epa.gov ; dee\_morse@nps.gov ; Gibson, Victoria ; Mitchell, Bruce  
**Sent:** Thu Jul 24 16:29:43 2008  
**Subject:** Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

Dear Sir/Madam:

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This is the official notification of the Final Permit Issuance for the following project:

**Owner/Company Name:** Georgia-Pacific Consumer Operations LLC  
**Facility Name:** Palatka Pulp & Paper Mill  
**Project Number:** 1070005-053-AC  
**Project Description:** No. 4 Recovery Boiler, Consumed Air Project  
**PSD Permit Number:** PSD-FL-380(B)

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*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

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

**Walker, Elizabeth (AIR)**

---

**From:** Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]  
**To:** Walker, Elizabeth (AIR)  
**Sent:** Thursday, July 24, 2008 6:45 PM  
**Subject:** Read: Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

Your message

To: [KEITH.WAHOSKE@GAPAC.com](mailto:KEITH.WAHOSKE@GAPAC.com)  
Subject:

was read on 7/24/2008 6:45 PM.

**To:** undisclosed-recipients  
**Sent:** Thursday, July 24, 2008 6:24 PM  
**Subject:** Read: Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

Your message

## Best Available Copy

To: [DBuff@GOLDER.com](mailto:DBuff@GOLDER.com)  
Subject:

was read on 7/24/2008 6:24 PM.

**Walker, Elizabeth (AIR)**

---

**From:** Buff, Dave [DBuff@GOLDER.com]

**Best Available Copy**

## Walker, Elizabeth (AIR)

---

**From:** Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]  
**To:** Walker, Elizabeth (AIR)  
**Sent:** Friday, July 25, 2008 6:45 AM  
**Subject:** Read: Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

Your message

To: [MICHAEL.CURTIS@GAPAC.com](mailto:MICHAEL.CURTIS@GAPAC.com)  
Subject:

was read on 7/25/2008 6:45 AM.

## Walker, Elizabeth (AIR)

---

**From:** Dee\_Morse@nps.gov  
**Sent:** Friday, July 25, 2008 10:47 AM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Re: Final Permit Issuance - Georgia-Pacific/Palatka Mill (PSD-FL-380(B))

The Palatka Mill notice was received.

Dee Morse  
Environmental Protection Specialist  
Air Resources Division  
Natural Resource Program Center  
National Park Service  
Phone: 303 969-2817  
Fax: 303 969-2822  
e-mail: [dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)

"Walker,  
Elizabeth  
\(AIR\)"  
<Elizabeth.Walker  
@dep.state.fl.us>

07/24/2008 05:29  
PM AST

To  
<[keith.wahoske@gapac.com](mailto:keith.wahoske@gapac.com)>,  
<[michael.curtis@gapac.com](mailto:michael.curtis@gapac.com)>,  
<[mjaguila@gapac.com](mailto:mjaguila@gapac.com)>, "Mr. David A.  
Buff, P.E., Golder Associates,  
Inc." <[dbuff@golder.com](mailto:dbuff@golder.com)>

cc

"Kirts, Christopher"  
<[Christopher.Kirts@dep.state.fl.us](mailto:Christopher.Kirts@dep.state.fl.us)>  
,  
<[Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov)>,  
<[dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)>, "Gibson,  
Victoria"  
<[Victoria.Gibson@dep.state.fl.us](mailto:Victoria.Gibson@dep.state.fl.us)>,  
"Mitchell, Bruce"  
<[Bruce.Mitchell@dep.state.fl.us](mailto:Bruce.Mitchell@dep.state.fl.us)>

Subject

Final Permit Issuance -  
Georgia-Pacific/Palatka Mill  
(PSD-FL-380(B))

Dear Sir/Madam:

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This is the official notification of the Final Permit Issuance for the following project:

Owner/Company Name: Georgia-Pacific Consumer Operations LLC Facility Name: Palatka Pulp & Paper Mill Project Number: 1070005-053-AC Project Description: No. 4 Recovery Boiler, Consumed Air Project PSD Permit Number: PSD-FL-380(B)

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access this document by opening the attached file, or search for project documents using the "Air Permit Documents Search"

website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Elizabeth Walker  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you.

Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.



STATE OF FLORIDA

County of Putnam

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Palatka Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

Florida Department of Enviro

Was published in said newspaper 1 time(s) with said being made on the following dates:

07/05/2008

The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice and/or advertisement.

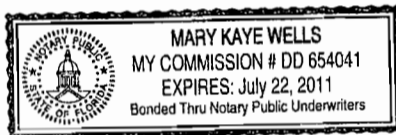
*Jeannette Eveland*

Sworn to and subscribed to before me this 7th day of July, 2008 by Jeannette Eveland, Administrative Assistant, of the Palatka Daily News, a Florida corporation, on behalf of the corporation.

*Mary Kaye Wells*

Mary Kaye Wells, Notary Public  
My commission expires July 22, 2011

Notary Seal  
Seal of Office:



\_\_\_\_/\_\_\_\_ Personally known to me, or  
\_\_\_\_/\_\_\_\_ Produced identification:  
\_\_\_\_/\_\_\_\_ Did take an oath

PUBLIC NOTICE

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Project No. 1070005-053-AC Draft Air Permit Revision No. PSD-FL-380(B)  
Georgia-Pacific Consumer Operations LLC  
Palatka Mill  
Putnam County, Florida

Applicant: The applicant for this project is the Georgia-Pacific Consumer Operations LLC. The applicant's authorized representative and mailing address

is: Mr. Keith Wahoske, Vice President, Palatka Operations, Georgia-Pacific Consumer Operations, LLC, P.O. Box 919, Palatka, Florida 32178-0919.

Facility Location: Georgia-Pacific Consumer Operations LLC operates an existing paper and pulp mill in Palatka located North of CR 216 and West of US 17 in Putnam County, Florida.

Project: The applicant requests authorization to install a Consumed Air process control system on the No. 4 Recovery Boiler to improve combustion and efficiency of the unit. The proposed new control package will reduce variation in the combustion process by increasing and decreasing the amount of black liquor solids (BLS) to the boiler to maintain a consistent boiler exit oxygen level, thus establishing a constant air-to-fuel ratio. The oxygen consumed in the combustion process is an indirect measurement of heat input to the boiler and is utilized in controlling fuel feed to the boiler. Air permit No. PSD-FL-380(A) will be revised to include this minor change.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project.

The Permitting Authority's physical address is 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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

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

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

Petitions: A person whose substantial interests are affected by the proposed permitting decision may

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**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute, and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit Revision. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

Legal No. 04540949  
07/05/08

STATE OF FLORIDA

County of Putnam

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Palatka Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

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*Jeannette Eveland*

Sworn to and subscribed to before me this 7th day of July, 2008 by Jeannette Eveland, Administrative Assistant, of the Palatka Daily News, a Florida corporation, on behalf of the corporation.

*Mary Kaye Wells*

Mary Kaye Wells, Notary Public  
My commission expires July 22, 2011



Notary Seal  
Seal of Office:

\_\_\_\_/\_\_\_\_ Personally known to me, or  
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PUBLIC NOTICE

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Putnam County, Florida

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\_\_\_\_\_  
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Personally known to me, or  
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Because the administrative hearing process signed to form agency action, this petition means Permitting Authority action may be from the position. If in this Public Notice to issue Air