



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

September 26, 2008

{Sent by Electronic Mail - Return Receipt Requested}

Mr. Keith Wahoske, Vice President of Palatka Operations
Georgia-Pacific, Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

Re: Approval of the BLS F-Factor for the No. 4 Recovery Boiler
Permit No. PSD-FL-380 (Project No. 1070005-038-AC)

Dear Mr. Wahoske:

In accordance with Condition 7 in Subsection 3D of Permit No. 380, you requested approval of a site-specific F-factor for black liquor solids (BLS). Your request is based on a summary report of flow rate and operational data collected during stack tests conducted on April 7th and 11th in 2008. You propose an F-factor of 6527 scf/MMBtu of heat input to the No. 4 Recovery Boiler, which resulted in the following differences from the measured flow rates for three load test ranges.

Load Condition	Load (MMBtu/hour)	Percent Capacity	Measured Stack Flow (dscfm)	Predicted Stack Flow (dscfm)	Percent Difference
High	1300	97%	184,984	185,451	+0.3%
Medium	1129	84%	156,233	167,779	+6.9%
Low	1014	75%	160,092	149,474	-6.6%

For each load condition, three 1-hour test runs were conducted. The above table summarizes the average for each load range. The predicted values are within 10% of the actual flow rates determined using EPA Methods 1 – 4.

In accordance with Condition 7 in Subsection 3D of Permit No. 380, the Bureau of Air Regulation approves the proposed F-Factor of 6527 scf/MMBtu of heat input from BLS to the No. 4 Recovery Boiler. For each required emissions stack test, please continue to measure the flow rate and provide a comparison between the measured flow rate and predicted flow rate. If operations change that would affect the F-factor for the BLS, it may be necessary to repeat the test protocol to update the F-factor.

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 agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 21 days of receipt of this agency action. 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. 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.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (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.

If you have any questions, please call me at 850/921-9536.

Sincerely,



Trina Vielhauer, Chief
Bureau of Air Regulation

cc: Mr. Keith Wahoske, Georgia-Pacific (keith.wahoske@gapac.com)
Mr. Mike Curtis, Georgia-Pacific (michael.curtis@gapac.com)
Mr. David Buff, Golder Associates Inc. (dave_buff@golder.com)
Mr. Chris Kirts, NED Office (kirts_c@dep.state.fl.us)
Ms. Vickie Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Livingston, Sylvia

From: Curtis, Michael [MICHAEL.CURTIS@GAPAC.com] **Sent:** Fri 10/3/2008 9:39 AM
To: Livingston, Sylvia; Wahoske, Keith
Cc:
Subject: RE: Georgia-Pacific, Palatka Mill/Project No. 1070005-038-AC (PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler
Attachments:

We have received the permit modification

Mike Curtis
 Compliance Director
 Palatka Mill
 (386)-329-0918

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

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, October 03, 2008 9:34 AM
To: Wahoske, Keith; Curtis, Michael
Subject: FW: Georgia-Pacific, Palatka Mill/Project No. 1070005-038-AC (PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler

We have not received confirmation that you were able to access the documents attached to this September 26th e-mail. Please confirm receipt by opening the attached document and sending a reply.

Thanks,

Sylvia Livingston
 Bureau of Air Regulation
 Division of Air Resource Management (DARM)
 850/921-0771
 sylvia.livingston@dep.state.fl.us

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey:

<http://survey.dep.state.fl.us/?refemail=Sylvia.Livingston@dep.state.fl.us>
 s Thank you in advance for completing the survey.

From: Livingston, Sylvia
Sent: Fri 9/26/2008 12:28 PM

To: keith.wahoske@gapac.com; Michael.curtis@gapac.com
Cc: dave_buff@golder.com; Kirts, Christopher; Gibson, Victoria;
Walker, Elizabeth (AIR); Koerner, Jeff
Subject: Georgia-Pacific, Palatka Mill/Project No.
1070005-038-AC
(PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler

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, noting that you can view the documents, 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>
<<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,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

<<1070005-038-AC.pdf>>

Livingston, Sylvia

From: Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com] **Sent:** Fri 10/3/2008 11:07 AM
To: Livingston, Sylvia
Cc:
Subject: RE: Georgia-Pacific, Palatka Mill/Project No. 1070005-038-AC (PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler
Attachments:

I am sorry you had to send a second request. I believe Mike Curtis replied.

Thank you

Keith Wahoske

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

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, October 03, 2008 8:34 AM
To: Wahoske, Keith; Curtis, Michael
Subject: FW: Georgia-Pacific, Palatka Mill/Project No. 1070005-038-AC (PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler

We have not received confirmation that you were able to access the documents attached to this September 26th e-mail. Please confirm receipt by opening the attached document and sending a reply.

Thanks,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey:

<http://survey.dep.state.fl.us/?refemail=Sylvia.Livingston@dep.state.fl.us>
s Thank you in advance for completing the survey.

From: Livingston, Sylvia
Sent: Fri 9/26/2008 12:28 PM
To: keith.wahoske@gapac.com; Michael.curtis@gapac.com

Cc: dave_buff@golder.com; Kirts, Christopher; Gibson, Victoria;
Walker, Elizabeth (AIR); Koerner, Jeff
Subject: Georgia-Pacific, Palatka Mill/Project No.
1070005-038-AC
(PSD-FL380) - Approval of the BLS F-Factor for the No. 4 Recovery Boiler

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, noting that you can view the documents, 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>>
<<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,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

<<1070005-038-AC.pdf>>