

2004 DEC +8 ₱ 1: 58%

NORTHEAST DISTRICT JACKSONVILLE, FL Palatka Pulp and Paper Operations
Consumer Products Division

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

December 6, 2004

Florida Department of Environmental Protection Northeast District Office, Air Program 7825 Baymeadows Way, Suite B-200 Jacksonville, Florida 32256-7590

United States Environmental Protection Agency – Region 4 Attention: POWC MACT Coordinator 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

Subject:

Initial Notification Report for MACT Compliance Status: REVISION #1

National Emission Standards for Hazardous Air Pollutants:

Paper and Other Web Surface Coating NESHAP

40 CFR Part 63 Subpart JJJJ

### Gentlemen:

As required by 40 CFR Sections 63.9(b) and 63.3400(b), Georgia-Pacific Corporation (the "Company") submits this Initial Notification Report (INR) of Maximum Achievable Control Technology (MACT) applicability. This notice covers the Paper and Other Web Surface Coating NESHAP at 40 CFR Part 63 Subpart JJJJ.

The revised Initial Notification Report form is attached pursuant to Section 63.9(b)(2). The form was revised to add "towel laminating and transfer processes" to the list of potentially affected sources.

If there are any questions on this Initial Notification Report, please contact Myra Carpenter, Environmental Superintendent at (386) 329-0918.

Sincerely,

Theodor Skewish

Theodore D. Kennedy

cc: W. M. Jernigan S. D. Matchett

Post-it Fax Note 7671	Date 1-1/-05 pages > 0
To Kohay Kull	From Rita MITE
Co./Dept.	co. NED
	Phone #
7.211-4033	Fax#

# INITIAL NOTIFICATION REPORT - GP Palatka, FI - Rev. 1 40 CFR 63 - Subpart JJJJ Page 1 of 2

# SECTION I GENERAL INFORMATION

This form is being submitted in accordance with 40 CFR 63.9(b) and as required by 40 CFR 63.3400(b).

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (IF AVAILABLE) Facility i.D. Number (IF AVAILABLE)				
Florida – 1070005-023AV Florida - 1070005				
Name of Owner or Operator	·			
Georgia-Pacific Corpor	ration			
Street Address				
133 Peachtree Street N	4E			
City	State	ZIP Code		
Atlanta	ĞĀ	30303		
Facility (Affected Source) Name				
	ration – Palatka Operati	ons		
Facility Street Address (If different (				
County Road 216 - Pa	O. Box 919			
Facility Local Contact Name	Title	Phone		
Myra Carpenter	Environmental Supt.	386-329-0918		
City	State	ZiP Code		
Palatka	FL	32178-0919		

Check the box that applies. (§63.9(b)(2)(v))

- ☑ My facility is a major source of Hazardous Air Pollutants (HAP)
- My facility is an area source of HAP

NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are erea sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

C. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date
National Emission Standards for Hazardous Air Pollutarits: Paper	December 5, 2005
and Other Web Coating (40 CFR Part 63, Subpart JUD)	- DC00111D01 0, 2000

# INITIAL NOTIFICATION REPORT - GP Palatka, FI 40 CFR 63 - Subpart JJJJ

Page 2 of 2

SECTION	· <b>II</b>	
SOURCE	DESCRIPTION	

A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

This facility manufactures approximately 580 tons per day of tissue products such as bathroom tissue, paper towels, and napkins from pulp that is produced by the kraft pulping process in another part of this source. The facility is operated continuously throughout the year except for periodic maintenance shutdowns.

B. Identify the types of emission points within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

# Types of Emission Points

This facility has preliminarily identified that the core manufacturing process in the tissue converting plant is a non-point source that may be subject to Subpart JJJJ.

In addition, the towel laminating and transfer processes may be subject to Subpart JJJJ.

# Types of HAP Emitted

Check the boxes indicating the principal types of HAP emitted by the affected source subject to Subpart JJJJ. Check all that apply.

- ☐ Metal HAP (for example, arsenic, beryilium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, selenium)
- ☑ Organic HAP (for example, acetaldehyde, benzene, formaldehyde, toluene, xylenes)
- ☐ Acid gas HAP (for example, hydrogen chloride, hydrogen fluoride)

# SECTION III CERTIFICATION

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Theodore D. Kennedy	Vice-President	12/05/04
Signature of Responsible Official		
Theyour Councily		

Note: Responsible official is defined in 40 CFR §83.2, §70.2 and §71.2 and in EPA-approved State title V operating permits programs.



STATE OF HEORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

2004 DEC -6 ₱ 2: 4.1

Palatka Pulp and Paper Operations
Consumer Products Division

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

NORTHEAST DISTRICT JACKSONVILLE, FL

December 3, 2004

Florida Department of Environmental Protection Northeast District Office, Air Program 7825 Baymeadows Way, Suite B-200 Jacksonville, Florida 32256-7590

United States Environmental Protection Agency – Region 4 Attention: POWC MACT Coordinator 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

Subject: Initial Notification Report for MACT Compliance Status:

National Emission Standards for Hazardous Air Pollutants:

Paper and Other Web Surface Coating NESHAP

40 CFR Part 63 Subpart JJJJ

#### Gentlemen:

As required by 40 CFR Sections 63.9(b) and 63.3400(b), Georgia-Pacific Corporation (the "Company") submits this Initial Notification Report (INR) of Maximum Achievable Control Technology (MACT) applicability. This notice covers the Paper and Other Web Surface Coating NESHAP at 40 CFR Part 63 Subpart JJJJ.

The Initial Notification Report form is attached pursuant to Section 63.9(b)(2).

If there are any questions on this Initial Notification Report, please contact Myra Carpenter, Environmental Superintendent at (386) 329-0918.

Sincerely

Theodore D. Kennedy, Vice-President

Palatka Operations

Georgia Pacific Corporation

foliat R. Kamurakan FOR TOK. Gerations Manager

Attachment \*

o S

Scott Matchett William Jernigan Tammy Wyles Ed Jamro

# INITIAL NOTIFICATION REPORT - GP Palatka, FI 40 CFR 63 - Subpart JJJJ Page 1 of 2

### SECTION I GENERAL INFORMATION

This form is being submitted in accordance with 40 CFR 63.9(b) and as required by 40 CFR 63.3400(b).

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (IF AVAIL	ABLE)	Facility I.D. Nun	nber (IF AVA	NLABLE)
Florida - 1070005-023A	W	Florida - 1	070005	
Name of Owner or Operator				
Georgia-Pacific Corpora	<b>dion</b>			
Street Address				
133 Peachtree Street N	E	N.		
Clty	State		ZIP Code	
Atlanta	GA		30303	
Facility (Affected Source) Name				
Georgia-Pacific Corpora	ition - Palatk	a Operatio	กร	
Facility Street Address (If different Ov	wher or Operator)			
County Road 216 - P.O.	. Box 919	(1		and the second of the second o
Facility Local Contact Name	Title			Phone
Myra Carpenter	Envirenn	ental Supt.		386-329-0918
City S	tate		ZIP	Code
	L		321	78-0919

Check the box that applies. (§63.9(b)(2)(v))

- My facility is a major source of Hazardous Air Pollutants (HAP)
- ☐ My facility is an area source of HAP

NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

C. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	
National Emission Standards for Hezardous Air Pollutants: Paper	December 5, 2005
and Other Web Coating (40 CFR Part 63, Subpart JJ,JJ)	December 0, 2000

# INITIAL NOTIFICATION REPORT - GP Paiatka, FI 40 CFR 63 - Subpart JJJJ

Page 2 of 2

SECTION	11
SOURCE	DESCRIPTION

A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

This facility manufactures approximately 580 tons per day of tissue products such as bathroom tissue, paper towels, and napkins from pulp that is produced by the kraft pulping process in another part of this source. The facility is operated continuously throughout the year except for periodic maintenance shutdowns.

B. Identify the types of emission points within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

# Types of Emission Points

This facility has preliminarily identified that the core manufacturing process in the tissue converting plant is a non-point source that may be subject to Subpart JJJJ.

# Types of HAP Emitted

Check the boxes indicating the principal types of HAP emitted by the affected source subject to Subpart JJJJ. Check all that apply.

- ☐ Metal HAP (for example, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, selenium)
- ☑ Organic HAP (for example, acetaldehyde, benzene, formaldehyde, toluene, xylenes)
- ☐ Acid gas HAP (for example, hydrogen chloride, hydrogen fluoride)

# SECTION III CERTIFICATION

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
	Vice-President	12/03/04
Signature of Responsible Official		
	Operations Manager	12/03/04

Note: Responsible official is defined in 40 CFR §63.2, §70.2 and §71.2 and in EPA-approved State title V operating permits programs.