

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

December 18, 2007

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

Re: Air Construction Permit No. 1070005-050-AC
Georgia-Pacific Palatka Mill
Revisions for SO₂ and Oil Firing, No. 4 Recovery Boiler

Dear Mr. Wahoske:

You submitted an application requesting revisions to the SO₂ emissions standards for the No. 4 recovery boiler located at the Palatka Mill, which is located in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida. Enclosed are the following documents: Technical Evaluation and Preliminary Determination, Draft Permit, Written Notice of Intent to Issue Air Permit, and Public Notice of Intent to Issue Air Permit.

The Public Notice of Intent to Issue Air Permit 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.

Please submit any written comments you wish to have considered concerning the Department's proposed action to the project engineer, Jeff Koerner, at the letterhead address (Mail Station #5505). If you have any questions, please contact Mr. Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Air Permit No. 1070005-050-AC
Permit Expires: October 1, 2008

Authorized Representative:
Mr. Keith Wahoske, Vice President of Palatka Operations

Georgia-Pacific Palatka Mill
No. 4 Recovery Boiler
Revisions for SO₂ and Oil Firing

Facility Location: Georgia-Pacific Consumer Operations LLC operates the Georgia-Pacific Palatka Mill, which is a pulp and paper mill located in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida.

Project: The No. 4 Recovery Boiler fires black liquor solids (BLS) to recover the cooking liquor as part of the recovery process at the mill. Oil is fired as a startup fuel to bring the boiler up to temperature and pressure before the unit is fully functional on BLS. Oil may also be fired as a supplemental fuel to stabilize boiler operation, when BLS supply is temporarily interrupted or for shutdown. Currently, sulfur dioxide (SO₂) emissions from the boiler are limited to 75 ppmvd at 8% O₂, 109.9 lb/hour and 481.4 tons per year based on the average of three stack test runs. The applicant requests an air construction permit to revise this standard to 100 ppmvd at 8% O₂ based on a 24-hour average, excluding startup and shutdown, with compliance demonstrated by continuous emissions monitoring equipment. During startup and shutdown, maximum fuel oil firing will be restricted to a rolling 24-hour total of 67,680 gallons. The maximum fuel sulfur content will be 2.35% by weight. Annual SO₂ emissions will be capped at 153.9 tons during any consecutive 12 months with compliance demonstrated by continuous emissions monitoring equipment.

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, 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 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 in accordance with the conditions of the proposed Draft Permit 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 (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 Rule 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 postmarked 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.

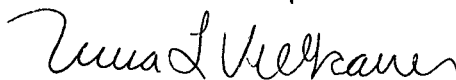
Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 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. 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, 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. 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

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

12/19/07 to the persons listed below.

Mr. Keith Wahoske, Georgia-Pacific Palatka Mill
Mr. Michael Curtis, Georgia-Pacific Palatka Mill
Mr. Christopher Kirts, NED Office

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.

Paula J. Friday 12/19/07
(Clerk) (Date)

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Section *JK*
DATE: December 18, 2007
SUBJECT: Draft Air Permit No. 1070005-050-AC
Georgia-Pacific Palatka Mill
SO₂ and Oil Firing Revisions, No. 4 Recovery Boiler

This project is subject to minor source preconstruction review. Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- P.E. Certification.

I recommend your approval of the attached Draft Permit.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Air Permit No. 1070005-050-AC
Georgia-Pacific Palatka Mill
No. 4 Recovery Boiler
Revisions for SO₂ and Oil Firing

PROJECT DESCRIPTION

As part of the recovery process at the mill, the No. 4 recovery boiler (EU-018) fires black liquor solids (BLS) to recover the cooking liquor. No. 6 fuel oil (2.35% sulfur by weight, max.) is fired as a startup, shutdown and occasional supplemental fuel. During startup, fuel oil is fired to gradually bring the boiler up to temperature and pressure before the unit is fully functional on BLS. The Title V permit includes an SO₂ limit of 75 ppmvd @ 8% O₂, and 109.9 lb/hour and 481.4 tons per year. The applicant requests a revision of this limit to 100 ppmvd @ 8% O₂ (equivalent to 292.8 lb/hour) based on a 24-hour rolling average and clarification that the SO₂ limit does not apply during startup or shutdown. To support the request, the applicant provided an air dispersion modeling analysis for SO₂ emissions indicating:

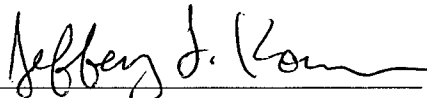
- Compliance with the ambient air quality standards (AAQS) when firing oil at maximum capacity (such as startup); and
- Compliance with the PSD Class II increments of Permit No. PSD-FL-380 (Project No. 1070005-038-AC) when firing BLS with some supplemental No. 6 fuel oil.

The current SO₂ emissions standards were established in Permit No. PSD-FL-226 (AC54-26667) to avoid PSD preconstruction review. However, 75 ppmvd @ 8% O₂ does not correspond to 109.9 lb/hour. This appears to be an error in the permit. The supporting application for that project requested a limit of 109.9 lb/hour corresponding to an annual average concentration of 37.5 ppmvd @ 8% O₂. When firing BLS, SO₂ emissions are typically less than 5 ppmvd at 8% O₂. When firing No. 6 fuel oil at maximum capacity, SO₂ emissions approach 632 ppmvd at 8% O₂ for a 3-hour average and 355 ppmvd at 8% O₂ for a 24-hour average. Therefore, the unit is not able to comply with the current standards when firing any significant amounts of oil since there are no SO₂ controls. In addition, Permit No. PSD-FL-380 established a much lower annual SO₂ emissions cap of 153.9 tons during any consecutive 12 months for subsequent PSD avoidance. Therefore, the draft permit includes the following standards and restrictions.

- The currently installed oil firing capacities of the burners will be identified.
- The unit shall not fire more than 67,680 gallons of fuel oil during any consecutive rolling 24 hours. This limit is protective of the AAQS when firing oil at maximum capacity (startup or shutdown).
- The annual capacity factor for oil firing shall be less than 10% of the maximum annual heat input rate of the unit. This ensures that the boiler is not a fossil fuel fired steam generating unit.
- As determined by CEMS, SO₂ emissions shall not exceed 100 ppmvd at 8% O₂ based on a 24-hour rolling average excluding periods of startup and shutdown. This limit is protective of the PSD Class II increments for normal operation.
- As determined by CEMS, SO₂ emissions shall not exceed 153.9 tons during any consecutive 12 months. This repeats the limit in Permit No. PSD-FL-380, which avoids PSD preconstruction review for that project.

For clarity, this project will be issued as a separate minor source air construction permit (Project No. 1070005-050-AC) to address only the oil firing and SO₂ conditions for the No. 4 Recovery Boiler. The conditions related to SO₂ emissions and oil firing requirements will replace all other similar conditions in previously issued air construction permits.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.
Registration Number: 49441

12-18-07

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. 1070005-050-AC
Georgia-Pacific Consumer Operations LLC, Georgia-Pacific Palatka Mill
Putnam County, Florida

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

Facility Location: Georgia-Pacific Consumer Operations LLC operates the existing Georgia-Pacific Palatka Mill, which is a pulp and paper mill located in Putnam County, North of County Road 216 and West of U.S. Highway 17 in Palatka, Florida.

Project: The No. 4 Recovery Boiler fires black liquor solids (BLS) to recover the cooking liquor as part of the recovery process at the mill. Oil is fired as a startup fuel to bring the boiler up to temperature and pressure before the unit is fully functional on BLS. Oil may also be fired as a supplemental fuel to stabilize boiler operation, when BLS supply is temporarily interrupted or for shutdown. Currently, sulfur dioxide (SO₂) emissions from the boiler are limited to 75 ppmvd at 8% O₂, 109.9 lb/hour and 481.4 tons per year based on the average of three stack test runs. The applicant requests an air construction permit to revise this standard to 100 ppmvd at 8% O₂ based on a 24-hour average, excluding startup and shutdown, with compliance demonstrated by continuous emissions monitoring equipment. During startup and shutdown, maximum fuel oil firing will be restricted to a rolling 24-hour total of 67,680 gallons. The maximum fuel sulfur content will be 2.35% by weight. Annual SO₂ emissions will be capped at 153.9 tons during any consecutive 12 months with compliance demonstrated by continuous emissions monitoring equipment.

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, 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 in accordance with the conditions of the proposed Draft Permit 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 postmarked 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

(Public Notice to be Published in the Newspaper)

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. 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.

Friday, Barbara

To: keith.wahoske@gapac.com; Michael.Curtis@gapac.com; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Harvey, Mary
Subject: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill
Attachments: 1070005-050CoverLetter&WrittenNotice.pdf; 1070005-050-AC - Appendix.pdf; 1070005-050-AC - Draft Permit.pdf; 1070005-050-AC - Public Notice.pdf; 1070005-050-AC - TEPD.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).

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

12/19/2007

Friday, Barbara

From: System Administrator
To: Kirts, Christopher; Koerner, Jeff; Adams, Patty; Harvey, Mary
Sent: Wednesday, December 19, 2007 9:41 AM
Subject: Delivered:DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

Your message

To: 'keith.wahoske@gapac.com'; 'Michael.Curtis@gapac.com'; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Harvey, Mary
Subject: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill
Sent: 12/19/2007 9:41 AM

was delivered to the following recipient(s):

Kirts, Christopher on 12/19/2007 9:41 AM
Koerner, Jeff on 12/19/2007 9:41 AM
Adams, Patty on 12/19/2007 9:41 AM
Harvey, Mary on 12/19/2007 9:41 AM

Friday, Barbara

From: Exchange Administrator
Sent: Wednesday, December 19, 2007 9:41 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT107932.txt; DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill



ATT107932.txt
(374 B)



DRAFT Air
onstruction Permit .

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.

keith.wahoske@gapac.com
Michael.Curtis@gapac.com