

*Sent by Electronic Mail*

July 12, 2013

Mr. Syed Arif, Administrator  
Office of Air Permitting Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Re: Georgia-Pacific Consumer Operations LLC  
Palatka Mill, Facility ID No. 1070005  
DNCG Heater Removal**

Dear Mr. Arif:

The Palatka Mill is proposing to remove the DNCG (Dilute non-condensable gases) heater from the DNCG (aka HVLC, or high-volume, low concentration) NCG system. The DNCG heater is not necessary for destruction of DNCG in either of our boilers (No. 4 Combination Boiler – EU ID 016 and No. 5 Power Boiler – EU ID 015) used for this purpose. The heater has been the source of operational and maintenance problems.

The DNCG heater was included in the original design in order to meet paper industry guidelines issued by BLRBAC (Black Liquor Recovery Boiler Advisory Committee) for introducing DNCGs into a recovery boiler where the management of moisture is critical to safe operation. The design team's decision to adopt this specific "recovery boiler" BLRBAC guideline was conservative at the time. The heater is a simple shell & tube heat exchanger which uses steam to indirectly heat the DNCGs to maintain a relative humidity of less than 50%. However, this is not critical to the safe operation of our power boilers referenced above. Another reason for preheating the gases was to minimize the chance for overcooling of the flue gases below the acid dew point. Both of the boilers no longer burn fuel oil and thus acid dew point is of little concern.

The DNCG heater originally had a lower temperature limit that would trip out the DNCG system if the minimum was not maintained. In order to eliminate the trips and the resulting DNCG vents, the setpoint has been reduced. The heater is still susceptible to plugging, however, requiring downtime of the DNCG system in order to clean and maintain it. If we were designing the system today, the DNCG heater would not be included.

The Palatka Mill proposes to remove the heater and replace it with a straight piece of pipe. The heater removal will have no effect on the destruction of DNCG in the boilers. System trips and downtime related to plugging and cleaning of the heater will also be eliminated.

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Since the proposed project arguably involves a physical change to an existing source of emissions (DNCG collection system) that is controlled by a regulated emissions unit (No. 5 Power Boiler or No. 4 Combination Boiler), we considered whether a significant emissions increase will result in order to determine if the change constitutes a major modification. Our conclusion was that the proposed change will not result in any emissions increase of PSD pollutants. If anything, emissions will decrease due to reduced venting related to low-temperature trips or plugging of the heater.

Also, since there will not be any change in the actual pulp production rate at the Mill as a result of this project, there are no upstream or downstream "associated" emission units that will be affected. Therefore, there are no associated emissions increases from upstream and downstream unmodified units as part of this project.

For all of the reasons stated above, we request the Department to exempt this project from the need to obtain a construction permit pursuant to Rule 62-4.040(1)(b) since the "*activity will not emit air pollutants...in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified*".

Should you have any questions concerning this submittal, please contact Ron Reynolds at (386) 329-0967.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary L. Frost', with a long horizontal line extending to the right.

Gary L. Frost  
Vice President

cc: Stuart Bartlett, FDEP, Jacksonville