STATEMENT OF BASIS

Georgia Pacific Corporation

Facility ID No.: 1070005
Putnam County

Title V Air Operation Permit Revision
PROPOSED Permit Project No.: 1070005-034-AV
Revision to Title V Air Operation Permit No.: 1070005-029-AV

The initial Title V Air Operation Permit, No. 1070005-002-AV, was issued/effective on October 30, 2000. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

A Title V Permit Revision, No. 1070005-011-AV, was issued/effective on January 20, 2002. The purpose of this revision was to 1) include the conditions of construction permit No. 1070005-005-AC for the Chlorine Dioxide Plant and Methanol Tank, and 2) include the conditions of Construction Permit No. 1070005-009-AC for the modification of the Tall Oil Plant.

A second Title V Permit Revision, No. 1070005-014-AV, was issued/effective on May 27, 2003. The purpose of this revision was 1) to incorporate the provisions of 40 CFR 63 Subpart MM-National Emissions Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills, 2) to incorporate the provisions of 40 CFR 63 Subpart S – National Emissions Standards for Hazardous Air Pollutants for Pulp Mills as it pertains to Emissions Unit No. 036 (Elemental Chlorine-Free No. 3 Bleach Plant) based on AC permitting action No. 1070005-006-AC/PSD-FL-264, and 3) incorporate a Compliance Plan to address the operation of the Elemental Chlorine-Free No. 3 Bleach Plant.

On June 5, 2003, the Department issued DRAFT Title V Permit Revision No. 1070005-020-AV. The subject of this permit revision was to 1) incorporate the provisions of 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants for Pulp Mills based on AC permitting action, Nos. 1070005-007-AC and 1070005-017-AC, and 2) incorporate the terms and conditions of AC permit action No. 1070005-018-AC for the No. 7 Package Boiler. Comments on this DRAFT Title V Permit Revision were received from the applicant on September 15, 2003.

On September 16, 2003, the Department received a Title V Permit Revision Application from the applicant to incorporate the terms and conditions of AC permitting action No. 1070005-019-AC/PSD-FL-264A (Amendment to Permit No. 1070005-006-AC/PSD-FL-264 for the Elemental Chlorine-Free No. 3 Bleach Plant).

Georgia Pacific Corporation
Palatka Pulp and Paper Mill
Statement of Basis
DRAFT Permit No. 1070005-034-AV

The Department withdrew the DRAFT Title V Permit Revision No. 1070005-020-AV and replaced it with Title V Permit Revision 1070005-023-AV that incorporated the following: 1)the provisions of 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants for Pulp Mills based on AC permitting action, Nos. 1070005-007-AC and 1070005-017-AC; 2) the terms and conditions of AC permit action No. 1070005-018-AC for the No. 7 Package Boiler; 3)the terms and conditions of AC permitting action No. 1070005-019-AC/PSD-FL-264A (Amendment to Permit No. 1070005-006-AC/PSD-FL-264 for the Elemental Chlorine-Free No. 3

Bleach Plant); and the amendments to 40 CFR Subpart MM promulgated on December 5, 2003 not included with the application..

On February 7, 2005, The Department issued Title V Permit No. 1070005-029-AV, which modified scrubber surrogate monitoring parameters for the No. 3 Bleach Plant based on performance testing results. Excess emissions Rule 40 CFR 63.446(g) and recordkeeping requirements Rule 40 CFR 63.454(b) are added to the condensate stripper system subsection O. of the revision since both were omitted in earlier permits. In Subsection C. (EU016): The rule citation(s) has been modified to include Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment. Also, **Not Federally Enforceable** has been removed from Specific Conditions **A.1. & B.1.** Permitted Capacity because these capacities are in fact based on Permit No. 1070005-025-AC.

This Title V Revision is being issued under Permit No. 1070005-034-AV. This permit revision again modifies scrubber surrogate monitoring parameters for the No. 3 Bleach Plant based on performance testing results. Also, Specific Condition E.15 is being changed to reference the corrected state rule for SO2 testing method, from Rule 62-297.401(8), F.A.C. to Rule 62-297.401(6)(c), F.A.C.

The DRAFT permit is changed to correct the compliance date for existing sources subject to 40 CFR 63 Subpart DDDDD to September 13, 2007.

This facility is a Kraft pulp and paper mill that consists of major activities areas such as: chip handling, pulping, bleaching, chemical recovery, utilities, paper machines, converting, turpentine and tall oil production.

40 CFR 63 Subpart DDDDD Applicability

This facility is subject to the requirements of 40 CFR 63 Subpart DDDDD – Industrial, Commerical, and Institutional Boilers and Process Heaters effective November 12, 2004. Since each boiler subject to this subpart was constructed prior to April 2, 2002, the source is considered existing. In accordance with 40 CFR 63.7545(b), initial notification submittal is due March 12, 2005, for affected sources constructed before the promulgation date. The compliance date for existing sources is September 13, 2007. Since this date falls after the permit renewal deadline, October 30, 2005, its scheduled compliance with the rule will be evaluated at that time. CAM **does** apply.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V Air Operation Permit application received June17, 1996, this facility is a major source of hazardous air pollutants (HAPs).