STATEMENT OF BASIS

Georgia Pacific Consumer Operations LLC

Facility ID No.: 1070005
Putnam County

Title V Air Operation Permit Revision
FINAL Title V Air Operation Permit Revision No.: 1070005-037-AV

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.

Project 037: The purpose of this permit is for the Revision of the Title V Air Operation Permit to incorporate construction permit No. 1070005-024-AC, and to include changes agreed upon during the revised DRAFT processing of 1070005-031-AV. In addition, this Title V Permit is being issued in order to include the control requirements of the WLOX System pursuant to EPA Determination received on January 27, 2006. Construction for the WLOX System was authorized in Construction Permit No. 1070005-024-AC as part of the Oxygen Delignification project. However, the AC was silent on how the emissions would be controlled. GP will rout the emissions from the WLOX System to the Bleach Plant scrubber.

Project 024: The changes to the Georgia-Pacific Corporation (GP) Palatka Mill include the installation of a replacement brown stock washing (BSW) system, along with rejects, refining, knotter, and screening systems, and a new two-stage oxygen delignification system.

GP Palatka Mill proposes to replace the four existing vacuum drum washing lines with three (nominal 750 TPD) new displacement drum washers.

The new brown stock washer system is permitted for a maximum capacity of 118 tons of air-dried unbleached pulp (ADUP) per hour; 2,300 tons of ADUP per day as a daily maximum; 1,850 tons ADUP per day as a monthly average; and, 675,250 tons ADUP per year.

The high-volume, low-concentration (HVLC) dilute-noncondensable gases (DNCGs) from the brown stock washer system (Nos. 5, 6, and 7 BSW lines), and the associated pressure knotters and screens, will be collected, pursuant to the requirements of 40 CFR 63, Subpart S, in the HVLC DNCG gas collection system and treated by combustion in either the No. 4 Combination Boiler or the No. 5 Power Boiler.

Pulp from the BSW systems will be sent to the high density pulp storage tanks, then to the Kraft Paper Machines or the No. 3 Bleach Plant until the new oxygen delignification system is installed (no later than April 15, 2008).

After installation of the oxygen delignification system, pulp will also be sent through this system prior to entering the No 3. Bleach Plant.

The new oxygen delignification system will be a two-stage system. It will be installed to process soft pine or hardwood unbleached pulps. After oxygen delignification, the pulp will undergo post-oxygen delignification washing, followed by storage in the unbleached high density storage tank. From there, it will be pumped to an existing washer (the Bleach Plant pre-washer/decker) and then to the No. 3 Bleach Plant.

DNCGs from the oxygen delignification system, the post oxygen delignification washer, and the Bleach Plant pre-washer (decker), will be sent, pursuant to the requirements of 40 CFR 63, Subpart S, to the HVLC DNCG gas collection system for treatment by combustion in either the No. 4 Combination Boiler or the No. 5 Power Boiler.

The design capacity of the oxygen delignification system will be 1,522 TPD ADUP as a daily maximum.

Also as part of this project, the existing open, drum-type black liquor filter will be replaced with an enclosed, pressure-type filter relocated from the existing Brown Stock Washer system. No emissions are expected to occur from this pressure-type filter.

Pulping condensates from the HVLC collection system (the low point drain, the fan drain, and the mist eliminator associated with the HVLC System), will be collected in the existing foul condensate tank for treatment pursuant to the requirements of 40 CFR 63,Subpart S.

Below is a list of major equipment associated with this project:

Brown Stock Washer Lines:		
	Foam Tanks and Vacuum Tanks	New
	Best Management Practices (BMP) Tank	New
	Brown Stock Washers and Vacuum Pumps	New
	BSW Filtrate Tanks	New
	Knotters, Screens, and Knotters & Screens Feed Tanks	New
	Drainers	New
	Refiner Feed Tank	New
	Grit Washer	New
	Weak Black Liquor Tanks	New
	HVLC System Condensate Standpipe	New
	High Density Pulp Storage	Existing
	Reject handling system	New
Oxygen Delignification System:		
	Reactor Blow Tank and Blow Tube Vent Condenser	New
	Reactor vessels (1st and 2nd stages)	Relocated/refurbished
	Pump Standpipes	New
	White liquor oxidation system	New

List of major equipment associated with this project continued:

	Washer Filtrate Tanks	New
	Oxygen Delignification Washer	New
	Chemical Mixers, MC pumps	New
Bleach Plant:		
	Pre-wash System	Existing
Black Liquor Filter:		
	Pressure Filter	To be relocated from existing BSW System

The replacement BSW system will be installed by April 15, 2006, to meet the April 17, 2006 compliance deadline of 40 CFR 63, Subpart S and the requirements of Department Administrative Order No. 039-NE. The new oxygen delignification system will be installed by April 15, 2008, in order to meet the requirements of the referenced Administrative Order.

REGULATORY CLASSIFICATION

The new brown stock washer system will be subject to the requirements of 40 CFR 60, Subpart BB upon startup. The HVLC gases from the brown stock washer system will be collected and controlled pursuant to the requirements of 40 CFR 63, Subpart S.

The new oxygen delignification system will meet the requirements of 40 CFR 63, Subpart S upon startup.

The No. 4 Combination Boiler is regulated under Rule 62-296.404, F.A.C. – Kraft Pulp Mills; 40 CFR 63, Subpart S - Phase I, and 40 CFR 63, Subpart S – Phase II.

The No. 5 Power Boiler is regulated under Rule 62-296.404, F.A.C. – Kraft Pulp Mills; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 Million Btu per hour Heat Input; and, 40 CFR 63, Subpart S – Phase II.