STATEMENT OF BASIS

Georgia Pacific Consumer Operations LLC

Facility ID No.: 1070005
Putnam County

Title V Air Operation Permit Revision
DRAFT Permit Project No.: 1070005-054-AV
Revision to Title V Air Operation Permit No.: 1070005-048-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.

The subject of this permit revision is for the revision of the Title V Air Operation Permit, to incorporate the terms and conditions of air construction permit No. 1070005-049-AC which is for the installation of a new tall oil scrubber of like kind and incorporate the requested new parameter values for the #3 Bleach Plant scrubber limits for fan amperage and differential pressure. Specific Condition K.19 of Title V Permit No. 1070005-048-AV has been **changed from: K.19.** Wet Scrubber Operating Parameters. The wet scrubber shall be operated in a manner consistent with the minimum pH of the scrubbing medium effluent at 8.7 s.u., the minimum fan amperage of 7.8 amps and the maximum fan amperage of 19.3 amps (or backup monitoring of fan differential pressure with the minimum of 12.5 inches of water), and the minimum scrubber recirculation flow rate of 1,085 gpm. Operation of the wet scrubber below these minimum operating parameter values (unless reestablished pursuant to the procedures of Condition K.20.) or failure to perform procedures required by 40 CFR 63 Subpart S shall constitute a violation of Condition K.7. and be reported as a period of excess emissions. All parameters are to be reported as 3-hour rolling average.

{Permitting Note: Unless otherwise specified, the averaging time for this condition is based on the specified averaging time of the applicable test method.}

[40 CFR 63.453(o), Applicant Request dated 6/20/05, EPA Region 4 Letters dated 12/22/00 and 03/03/03 and GP comments dated August 15, 2006.]

To: K.19. <u>Wet Scrubber Operating Parameters</u>. The wet scrubber shall be operated in a manner consistent with the minimum pH of the scrubbing medium effluent at 8.7 s.u., the minimum fan amperage of 5.5 amps and the maximum fan amperage of 17.0 amps (or backup monitoring of fan differential pressure with the minimum of 11.1 inches of water), and the minimum scrubber recirculation flow rate of 1,085 gpm. Operation of the wet scrubber below these minimum operating parameter values (unless reestablished pursuant to the procedures of Condition K.20.) or failure to perform procedures required by 40 CFR 63 Subpart S shall constitute a violation of Condition K.7. and be reported as a period of excess emissions. All parameters are to be reported as 3-hour rolling average.

{Permitting Note: Unless otherwise specified, the averaging time for this condition is based on the specified averaging time of the applicable test method.}

[40 CFR 63.453(o), Applicant Request dated 6/20/05, EPA Region 4 Letters dated 12/22/00 and 03/03/03 and GP comments dated August 15, 2006]

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 June 17, 1996, this facility **is** a major source of hazardous air pollutants (HAPs).