STATEMENT OF BASIS

Georgia Pacific Wood Products LLC
Palatka Chip-N-Saw
Facility ID No.: 1070030
Putnam County

Title V Air Operation Permit Revision
DRAFT Permit Project No.: 1070030-007-AV
Revision to Title V Air Operation Permit No.: 1070030-004-AV

The initial Title V Air Operation Permit, No. 1070030-001-AV, was issued on **January 7, 1998**. 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 007-AV: The subject of this permit revision is to incorporate the terms and conditions of air construction permit, No. 1070030-006-AC is to add the Plywood MACT 40 CFR 63, Subpart DDDD to the Title V permit; to incorporate Project 005 Administrative Correction; to modify the kiln emission factor for PM; to update methanol estimates; to eliminate the Trim Hog Cyclone from operation. The shavings from the Trim Hog will then be pneumatically conveyed to the planer mill cyclone; a new fan will be added to the Planer Mill Cyclone to increase the airflow from 10,700 acfm to 36,000 scfm; the hourly board foot per batch for the kilns will be increased. This is not an increase in the annual production, or fuel usage.

This facility consists of two direct-fired lumber kilns.

The kilns use the heat from the carbonaceous (wood waste) burners to dry green lumber. The maximum design heat input of each burner is 26 MMBtu per hour. The primary fuel for the kilns is green sawdust. The sawdust is fed to each kiln through an auger feed system. The East kiln's fuel auger feeds approximately 12 lbs per revolution. The West kiln's fuel auger feeds approximately 17 lbs per revolution. On-spec used oil may be fired in the kiln. The emissions from each dry kiln are released through 12 vents.

Trim Hog Cyclone will be removed from operation. Planer Mill Cyclone Fan: A new fan will be added to the Planer Mill Cyclone to increase the airflow from 10,700 acfm to 36,000 scfm. Kilns permitted capacity: The hourly board foot per batch for the kilns has been increased from 125,000 BF/batch to 135,000 BF/batch. This increase in hourly BF/batch production shall not increase the annual BF production, or the hourly fuel usage. In accordance with Air Construction Permit No. 1070030-002-AC, the maximum heat input rate of each burner is 26 MMBtu per hour.

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

CAM does not apply.

Based on the Title V Air Operation Permit Revision application received July 28, 2006, this facility is a major source of hazardous air pollutants (HAPs).