



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

April 8, 2011

*Electronically Sent – Received Receipt Requested*

Gary L. Frost, Vice President Operations  
Georgia Pacific Consumer Operations, LLC  
P.O. Box 919  
Palatka, FL 32178-0919

Re: Request for Additional Information  
DEP File No. 1070005-067-AC

Dear Mr. Frost:

The Department received your response to request for additional information for an Air Construction Permit on March 14, 2011. After Department review and teleconferences between your staff and our office on March 29, April 1, and April 6, it has been determined that the application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide revised flow data to for the kiln corrected to 10% O<sub>2</sub> and justify all assumptions. Provide all calculation revisions based on the corrected flow rates.
2. Provide revised projected actual emissions based upon the revised calculations and justify all assumptions. Provide emission factor consistency for each pollutant when comparing the baseline to projected actual emissions.
3. Define all other revisions or assumptions made to the revised calculations and emissions.
4. The application indicates there will be no greenhouse gas emissions increases with this project. Please provide a more detailed explanation to justify the emissions calculations found in the application tables.
5. Provide revised tables and narratives as necessary.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a construction permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

## Livingston, Sylvia

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**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Friday, April 08, 2011 1:35 PM  
**To:** Livingston, Sylvia; Frost, Gary (Florida)  
**Subject:** RE: Request for Additional Information: Georgia Pacific Consumer Operations, LLC (1070005-067-AC)

Documents received.

Thank you!

-----Original Message-----

**From:** Livingston, Sylvia [<mailto:Sylvia.Livingston@dep.state.fl.us>]  
**Sent:** Friday, April 08, 2011 11:23 AM  
**To:** Frost, Gary (Florida)  
**Cc:** Reynolds, Ron E.; [dbuff@golder.com](mailto:dbuff@golder.com); Kirts, Christopher; [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov); [Abrams.heather@epa.gov](mailto:Abrams.heather@epa.gov); Gibson, Victoria; Bull, Robert; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Georgia Pacific Consumer Operations, LLC (1070005-067-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

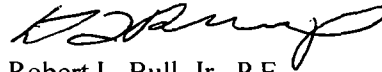
Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

Mr. Gary Frost  
DEP File No. 1070005-067-AC  
Page 2

We appreciated the opportunity to discuss the project with your technical experts. We look forward to discussing our questions with you and your consultants in the near future. If you should have any questions, please contact Bobby Bull, P.E. at 850/717-9111.

Sincerely,



Robert L. Bull, Jr., P.E.  
New Source Review Section

Cc: Mr. Gary L. Frost, Georgia-Pacific Consumer Operations, LLC (gary.frost@gapac.com)  
Mr. Ron Reynolds, Georgia-Pacific Consumer Operations, LLC (ron.reynolds@gapac.com)  
Mr. David A. Buff, Golder Associates (dbuff@golder.com)  
Mr. Christopher Kirts, Northeast District Office (Christopher.Kirts@dep.state.fl.us)  
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)  
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)  
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

**Livingston, Sylvia**

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**From:** Livingston, Sylvia  
**Sent:** Friday, April 08, 2011 11:23 AM  
**To:** 'gary.frost@gapac.com'  
**Cc:** 'ron.reynolds@gapac.com'; 'dbuff@golder.com'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'Abrams.heather@epa.gov'; Gibson, Victoria; Bull, Robert; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Georgia Pacific Consumer Operations, LLC (1070005-067-AC)  
**Attachments:** RAI 1070005-067-AC.pdf

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>	<b>Read</b>
	'gary.frost@gapac.com'		
	'ron.reynolds@gapac.com'		
	'dbuff@golder.com'		
	Kirts, Christopher	Delivered: 4/8/2011 11:23 AM	
	'forney.kathleen@epa.gov'		
	'Abrams.heather@epa.gov'		
	Gibson, Victoria	Delivered: 4/8/2011 11:23 AM	Read: 4/8/2011 11:25 AM
	Bull, Robert	Delivered: 4/8/2011 11:23 AM	Read: 4/8/2011 11:27 AM
	Walker, Elizabeth (AIR)	Delivered: 4/8/2011 11:23 AM	

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Thank you,

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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## Gibson, Victoria

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**From:** Gibson, Victoria  
**Sent:** Thursday, March 24, 2011 4:42 PM  
**To:** Bull, Robert; Koerner, Jeff; 'Forney.Kathleen@epamail.epa.gov'; Felton-Smith, Rita  
**Cc:** Walker, Elizabeth (AIR)  
**Subject:** Georgia-Pacific Consumer Operations LLC - Palatka Pulp & Paper Mill -- 1070005-067-AC

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Tracking:	Recipient	Delivery	Read
	Bull, Robert	Delivered: 3/24/2011 4:42 PM	Read: 3/25/2011 7:35 AM
	Koerner, Jeff	Delivered: 3/24/2011 4:42 PM	Read: 3/24/2011 5:08 PM
	'Forney.Kathleen@epamail.epa.gov'		
	Felton-Smith, Rita	Delivered: 3/24/2011 4:42 PM	Read: 3/25/2011 9:10 AM
	Walker, Elizabeth (AIR)	Delivered: 3/24/2011 4:42 PM	

A new **Application** has been received at FL Department of Environmental Protection Div. of Air Resource Management and is currently under review.

### Link to Permit Application Documents:

<http://arm-permit2k.dep.state.fl.us/psd/1070005/000059FC.pdf>

<b>ARMS PA Project ID:</b>	<b>1070005-067-AC</b>
<b>Facility Name:</b>	<b>Georgia-Pacific Consumer Operations LLC - Palatka Pulp &amp; Paper Mill</b>
<b>Florida County:</b>	<b>Putnam</b>
<b>Project Description:</b>	<b>Application for AC Permit</b>
<b>Permit Application Processor:</b>	<b>Robert Bull</b>
<b>Processor Phone:</b>	<b>(850) 717-9111</b>
<b>Processor Email Address:</b>	<b><a href="mailto:Robert.Bull@dep.state.fl.us">Robert.Bull@dep.state.fl.us</a></b>
<b>Received in-house:</b>	<b>3/14/2011</b>

Please direct any questions regarding this permit application to the permit application processor. If you have any problems accessing these documents please let me know.

Thanks,

*Vickie*

Victoria Gibson, Administrative Secretary for  
Trina Vielhauer, Chief, Bureau of Air Regulation  
Division of Air Resource Management

[victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us)  
850-717-9091 fax 850-717-9097