



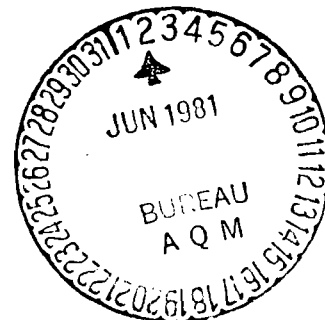
Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

June 1, 1981

Mr. Steve Smallwood
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301



Dear Mr. Smallwood:

Please find enclosed construction permit applications for three proposed air pollution sources at Georgia-Pacific's Palatka mill. These applications are submitted for processing under the State regulations and under Federal Prevention of Significant Deterioration procedures.

If you have any questions or comments concerning the applications please feel free to contact me, or Vernon Adams, at 904/325-2001. Dave Buff of ESE is also available to answer questions at 904/372-3318.

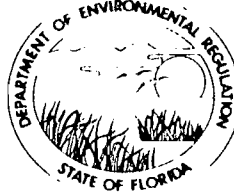
Sincerely,

Roger C. Sherwood
Technical Director

mg
enclosures

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

June 1, 1981

David Buff, Project Manager
Environmental Science and Engineering, Inc.
P. O. Box ESE
Gainesville, Florida 32602

RE: Federal PSD Permit Application -
Georgia Pacific, Inc.

Dear Mr. Buff:

We have reviewed the prevention of significant deterioration (PSD) plan of study for the proposed Georgia-Pacific plant modification which you submitted on behalf of the company on May 18, 1981. We find the plan acceptable provided that:

- o If four months of data are submitted to satisfy the monitoring requirement, the TSP samplers be operated on a 3-day schedule with minimum 90% data recovery; and
- o The data be collected in accordance with quality assurance procedures approved by the Department.

As soon as possible after the four months of data have been submitted, we will make a preliminary determination as to whether the PSD permit should be approved or disapproved and provide opportunity for public comment. We understand that quality assurance procedures for all monitoring programs conducted by ESE are being prepared and will be submitted to the Department for approval in the near future.

If you have any questions on data submittal and reporting, conatact Bill Blommel; on quality assurance, contact Dave Barker. Both may be reached at (904) 488-1344.

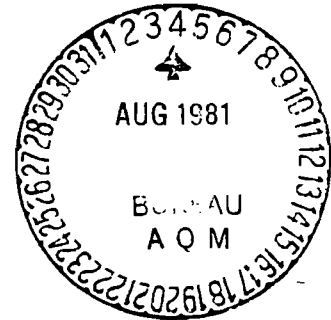
Sincerely,

Lawrence A. George
Environmental Administrator
Air Modeling Section

cc: Dave Barker
Bill Blommel
Johnny Cole

ESE ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

July 31, 1981
ESE No. 81-128-100



Mr. Steve Smallwood, P.E.
Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Subject: Permit Applications AC54-43773, AC54-43791, and AC54-43795

Dear Mr. Smallwood:

ESE, on behalf of Georgia Pacific Corporation, has reviewed your comments concerning the above referenced applications as contained in your letter of July 2, 1981. Presented below are the responses to these comments.

SO₂ Short-Term Analysis

*Table 4-2 was found to be incorrect in regards to SO₂ emissions for Lime Kilns #1, #2, and #3 and Power Boiler #4. The correct values are as shown in the computer model printouts. A revised Table 4-2 is included for your convenience.

*Your comments concerning the five-year SO₂ ISCST runs are correct. This source group (all projected sources) has been rerun with the five-year ISCST, and all ISCST refinements with this source group have also been rerun. These runs resulted in slightly higher projected SO₂ impacts, and as a result revised sections 6.0 and 7.1 of the PSD report are included for your review. Other sections of the PSD report are not affected by these changes in projected SO₂ air quality. As you will note, there is now slightly positive SO₂ increment consumption predicted for the proposed modification. Supportive computer model printouts are attached.

TSP Short-Term Analysis

*Your comment is correct concerning the five year TSP ISCST run. However, source group #3 contained only the proposed new G-P sources. The impacts from these sources were not used directly in the analysis, and actually were not even referred to in the report. Since this source group does not have any bearing on the results or conclusions of the PSD report, it is not considered necessary to rerun the model for this source group.

Long-Term Analysis

*Per your request, a key to the modeled sources is provided for both the SO₂ and TSP ISCLT model runs.

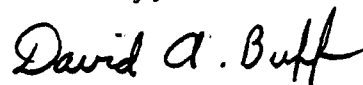
ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

Mr. Steve Smallwood
July 31, 1981
Page 2

Additional information has also been provided in Sections 6.1 and 6.2 demonstrating compliance with AAQS and PSD increments in the vicinity of Seminole Electric and FPL with the proposed sources in operation. This information should satisfy any concerns the Department may have had on this aspect of the project.

We hope this information facilitates your review of the application, but if you have any further questions, please call.

Sincerely,



David A. Buff, P.E.
Senior Engineer
Project Operations

DAB/sn

cc: Vernon Adams

Table 4-1. Short-Term Modeling Case Runs and Meteorological Periods

Scenario	Day
<u>SO₂</u>	
Maximum 24-Hour	280, 1970
Interaction with Seminole Electric	109, 1974 116, 1974 279, 1974
Interaction with FP&L Plants	280, 1970
Maximum 3-Hour	180, 4/1971
Interaction with Seminole Electric	109, 4/1974
Interaction with FP&L Plants	171, 6/1974
<u>TSP</u>	
Maximum 24-Hour	222, 1971 137, 1973 281, 1970
Interaction with Seminole Electric	7, 1973
Interaction with FP&L Plants	143, 1971

and various modeling reports were considered in developing the inventory, and the maximum emission rates contained therein were used.

4.4 AIR QUALITY IMPACT DETERMINATION

The ISCLT model was used to estimate annual average ground-level concentrations for TSP and SO₂. For these pollutants, modeling was performed for permitted sources within a 50-km radius, including the G-P sources. For annual nitrogen oxides (NO_x), reference is made to the March 1981 POS for which NO_x modeling was conducted. These modeling results showed that the proposed action will pose no threat to the AAQS. All annual printouts are included in Appendix B of this report.

Evaluation of short-term maximum impacts (highest, second-highest) for TSP and SO₂ for the G-P proposed conditions was made using the ISCST. The appropriate highest, second-highest concentrations were determined in 5-year ISCST executions with the following short-term interacting sources included with the G-P sources in the source input data:

1. Seminole Electric (7.5 km and 39 degrees from G-P),
2. FPL Putnam (10.9 km and 120 degrees from G-P), and
3. FPL Palatka (10.6 km and 123 degrees from G-P).

The results of the 5-year ISCST modeling were refined using the ISCST model to determine the maximum impacts and impacts in the interacting directions. The modeled sources and emissions are shown in Table 4-2.

4.5 INCREMENT CONSUMPTION DETERMINATION

The maximum short-term PSD increment consumption was determined by subtracting receptors point-by-point in 5-year ISCST baseline executions from 5-year ISCST projected impacts. Seminole Electric is the only new source in the G-P impact area and currently is under construction. FPL Palatka consumes TSP increments by virtue of a variance to emit particulate up to 0.3 lb/10⁶ Btu, increased from 0.1 lb/10⁶ Btu. FPL Putnam

Table 4-2. Modeled Sources and Emissions for G-P Proposed Modification

Source	Baseline Emissions				Projected Emissions	
	Annual (TPY)		Short-Term (lb/hr)		(lb/hr)	
	TSP	SO ₂	TSP	SO ₂	TSP	SO ₂
Recovery Boiler #1	345	216	78.8	49.3	—	—
Recovery Boiler #2	441	309	100.7	70.5	—	—
Recovery Boiler #3	477	298	109.0	68.1	—	—
Recovery Boiler #4	729	1,215	166.5	277.5	166.5	277.5
Proposed Recovery Boiler #5	—	—	—	—	75.4	250.0
Smelt #1	11	4	2.4	1.0	—	—
Smelt #2	16	6	3.6	1.4	—	—
Smelt #3	14	6	3.3	1.4	—	—
Smelt #4	193	25	40.8	5.6	40.8	5.6
Proposed Smelt	—	—	—	—	15.0	5.2
Lime Kiln #1	788	8	180.0	1.9	—	—
Lime Kiln #2	416	8	95.0	1.9	—	—
Lime Kiln #3	407	17	93.0	3.8	—	—
Lime Kiln #4	54.6	48.6	31.6	11.1	31.6	11.1
Proposed Lime Kiln #5	—	—	—	—	29.3	10.5
Power Boiler #4	105	1,192	106.3	358.9	106.3	358.9
Power Boiler #5	186	4,658	46.4	1,279.0	46.4	1,279.0
Combination Boiler #4	2,561	1,008	711.8	962.5	117.0	962.5
Proposed Combination Boiler #5	—	—	—	—	216.7	654.0
FPL Palatka	468	12,888	107.0	2,942.5	321.0	2,942.5
FPL Putnam	1,206	6,723	275.4	1,535.0	275.4	3,070.0
Seminole	—	—	—	—	324.6	12,984.1

Sources: ESE, 1981. G-P, 1981.

6.0 IMPACT ANALYSIS RESULTS

6.1 AIR QUALITY STANDARDS

6.1.1 Particulate Matter

The highest, second-highest predicted 24-hour ground-level concentration for the projected conditions considering the proposed action at G-P is 107.5 ug/m^3 , including an assumed background concentration of 80 ug/m^3 . This predicted maximum impact (highest, second-highest) is 72 percent of the AAQS for TSP. Predicted maximum interaction impacts are 101, 105, and 102 ug/m^3 (including background). These interactions are 67, 70, and 68 percent of the AAQS for TSP and result from operations at Seminole Electric, FPL Palatka, and FPL Putnam, respectively.

The maximum predicted annual TSP impact for the projected conditions, including all interacting sources, is 44 ug/m^3 and is 73 percent of the annual AAQS for TSP. This value includes the assumed background of 40 ug/m^3 . All modeling results are shown in Table 6-1 along with the applicable AAQS for visual comparison.

In order to demonstrate that AAQS will not be violated in the vicinity of Seminole Electric or FPL Palatka/Putnam due to operation of the proposed sources, two air quality impact reports were reviewed: "Seminole Electric PSD Application," Section 9.0, Modeling Analysis Results; and "Analysis of the Air Quality Impact Resulting From a Particulate Emission Rule Change for Fossil-Fuel Steam Generators in Florida," ESE, Inc., May 1979.

In the first referenced report, maximum TSP impacts in the vicinity of Seminole, Georgia-Pacific, and FPL were 3 ug/m^3 , annual average, and occurred 10 km almost due north of Seminole. If the maximum annual average TSP impact in the vicinity of Georgia-Pacific due to these sources, i.e., 4 ug/m^3 , is added to this (i.e., maximum added to maximum), 7 ug/m^3 is the result. Adding the TSP background of 40 ug/m^3 results in a total of 47 ug/m^3 , well below the annual standard of 60 ug/m^3 .

Table 6-1. Proposed G-P Mill Modification: Maximum Annual and Highest, Second-Highest Short-Term Predicted Concentrations*

Scenario	Concentration (ug/m ³)				Annual SO ₂	Annual TSP
	3-Hour SO ₂	24-Hour SO ₂	24-Hour TSP			
Maximum Predicted	410	116	108		22	44
Interaction with Seminole Electric	346	71	101		--	--
Interaction with FPL Putnam	355	116	105		--	--
Interaction with FPL Palatka	355	116	102		--	--
State of Florida Standard	1,300	260	150		60	60

* Concentrations include a TSP background of 80 ug/m³ (24-hour) and 40 ug/m³ (annual).

Source: ESE, 1981.

For the 24-hour averaging time, the Seminole PSD predicted a highest, second-highest point source impact of 5 ug/m^3 , which occurred in the vicinity of FPL. This value, however, does not reflect FPL Palatka's variance from 0.1 lb/mm Btu to 0.3 lb/mm Btu for particulate emissions. In the second referenced report above, FPL Palatka was predicted to have a maximum increase of 8 ug/m^3 24-hour impact due to the variance emission rate of 0.3 lb/mm Btu (Table 5.3 of said report). Adding both of these predicted maximums to the highest, second-highest predicted impact in the vicinity of G-P, 28 ug/m^3 (excluding background; see Table 6-1), and adding the background, 80 ug/m^3 , results in a total 24-hour concentration of 121 ug/m^3 . This value is still well below the AAQS of 150 ug/m^3 . This analysis, which is extremely conservative in nature, serves to adequately demonstrate without additional modeling that the TSP AAQS will not be violated in the vicinity of Seminole and FPL.

6.1.2 Sulfur Dioxide

The highest, second-highest 3- and 24-hour concentrations predicted for the proposed conditions are 410 and 116 ug/m^3 , respectively. Predicted highest, second-highest concentrations due to interaction with Seminole Electric, FPL Putnam, and FPL Palatka are 346 , 355 , and 355 ug/m^3 , respectively, for the 3-hour averaging time, and 71 , 116 , and 116 ug/m^3 , respectively, for the 24-hour averaging time (see Table 6-1). The maximum predicted annual SO_2 impact as a result of the proposed and including interacting sources is 22 ug/m^3 , or 37 percent of the annual SO_2 standard.

In order to demonstrate that SO_2 AAQS will not be violated in the vicinity of Seminole Electric or FPL Palatka/Putnam due to operation of the proposed sources, three air quality impact reports were reviewed: "Seminole Electric PSD Application," Section 9.0, Modeling Analysis Results; "Analysis of the Air Quality Impact Resulting from Burning Higher Sulfur Fuels," prepared for Florida Power & Light Company by ESE, Inc., March 1979; and "Study of the Impact on Air Quality as a Result of Stack Height Changes at FP&L Putnam Facilities," ESE, Inc., January 1980.

In the first referenced report, a maximum annual SO₂ concentration due to Seminole, G-P, and FPL was reported as 28 ug/m³, occurring 6 km almost due south of Seminole. If this value is added directly to the maximum annual average predicted in the vicinity of G-P, 22 ug/m³, the result is 50 ug/m³, which is still below the AAQS of 60 ug/m³. This is an extremely conservative methodology and result.

In the Seminole PSD application, the highest, second-highest reported SO₂ impacts were 60 ug/m³, 24-hour, and 514 ug/m³, 3-hour concentration. Both of these maximums occurred in the immediate vicinity of Seminole Electric. If this maximum is added directly to the highest, second-highest predicted concentrations in the vicinity of G-P (see Table 6-1), the resulting concentrations are 176 ug/m³, 24-hour average, and 924 ug/m³, 3-hour average. These levels are well below the SO₂ AAQS.

Review of the other referenced reports revealed that compliance with AAQS in the vicinity of FPL Palatka/Putnam could not be adequately demonstrated by the above conservative approach. Therefore, an additional 5-year ISCST model was executed with all projected sources included and receptors placed downwind of FPL in the direction which aligns FPL and G-P, 120° from north. The resulting highest, second-highest impacts were 87 ug/m³, 24-hour average, and 310 ug/m³, 3-hour average. These levels are below the AAQS and demonstrate that G-P will not cause or contribute to any violations in the vicinity of FPL.

6.1.3 Nitrogen Oxides and Carbon Monoxide

Preliminary modeling conducted for the POS showed small impacts for NO_x and CO; therefore, no additional modeling was conducted.

6.2 INCREMENT CONSUMPTION

The short-term increment consumption analysis is the same for the federal review as for DER; however, because EPA uses actual baseline emissions instead of allowable, the annual analysis predicted slightly different consumptions for the proposed action. The predicted short-term TSP

increment consumption under both EPA and DER regulations is negative (i.e., an air quality improvement at all locations compared to the baseline concentrations). Maximum increment consumption for SO₂ in the vicinity of G-P, based upon receptor-by-receptor subtraction of the 5-year ISCST baseline and projected results, is predicted to be 99 ug/m³, 3-hour average, and 15 ug/m³, 24-hour average. Because these maximum increment consumption levels are low compared to the allowable PSD increments, refined increment consumption model runs were not performed.

To demonstrate that PSD increments for SO₂ will not be exceeded in the vicinity of Seminole Electric, the reports referenced in Section 6.1 were again reviewed. In the Seminole PSD application, Seminole was the only increment consuming source, and it consumed a maximum of 5 ug/m³, annual average SO₂, 60 ug/m³, 24-hour average, and 437 ug/m³, 3-hour average. The maximum predicted increment consumption in the vicinity of G-P and in the direction towards Seminole Electric (see computer model printouts) is 6 ug/m³, annual average, 7 ug/m³, 24-hour average, and 24 ug/m³, 3-hour average. If these are added directly to the Seminole maximums, which is an extremely conservative methodology, the resulting concentrations are 11 ug/m³, annual average, 67 ug/m³, 24-hour average, and 461 ug/m³, 3-hour average. These values are all below the allowable Class II PSD increments.

To demonstrate that PSD increments for SO₂ will not be violated in the vicinity of FPL Palatka/Putnam, an additional 5-year ISCST with both baseline and projected sources was executed, with receptors placed downwind of FPL along the direction which aligns G-P and FPL. The results of this analysis showed maximum 24-hour increment consumption of 22 ug/m³ and maximum 3-hour increment consumption of 86 ug/m³, both below allowable Class II increments.

Annual TSP increment consumption under both DER and EPA regulations was negative at all receptor locations, indicating an improvement in TSP air quality compared to the baseline concentrations. Annual SO₂ increment

consumption based on DER regulations was less than 5 ug/m³, and annual SO₂ increment consumption was less than 6 ug/m³. Results of the increment consumption analysis are presented in Table 6-2 along with allowable Class II increments for comparison purposes.

6.3 CLASS I IMPACTS

Because of the distance to the nearest Class I area (Okefenokee Swamp, 120 km northwest), impacts on the Class I area were not addressed quantitatively. However, increment modeling in the vicinity of G-P showed a substantial decrease in TSP levels since the baseline.

6.4 DOWNWASH

In comparing the 24-hour highest, second-highest TSP refinement execution requesting the G-P proposed sources only with and without downwash, it was found that with the consideration of downwash effects, the maximum increase was only 1 ug/m³ above no downwash considerations. For the 24-hour SO₂ refinement, the maximum increase was 5 ug/m³ above the no-downwash case (24-hour averages).

In comparing four selected hours of meteorological data conducive to downwash effects, the maximum 1-hour increase due to downwash was 27 ug/m³ for TSP and 50 ug/m for SO₂. Using the EPA method given in the guidelines document, Volume 10, a factor of 0.6 (maximum) was used to correct for a 24-hour average. The increases were then predicted to be 16 ug/m³ and 30 ug/m³, respectively. If these increases were applied to the worst-case modeling results (see Sections 6.1.1 and 6.1.2), the resulting concentrations would remain below AAQS (123.5 ug/m³ for 24-hour TSP and 127.6 for 24-hour SO₂), indicating that the stacks proposed at heights less than GEP will not pose a threat to AAQS.

Table 6-2. Summary of PSD Increment Consumption Results: Proposed G-P Modification

Pollutant	Increment Consumption (ug/m ³)					
	EPA			DER		
	3-Hour	24-Hour	Annual	3-Hour	24-Hour	Annual
<u>Sulfur Dioxide</u>						
Maximum Increment Consumption	99	15	<6	99	15	<5
Allowable Increment	512	91	20	512	91	20
<u>Particulate</u>						
Maximum Increment Consumption	--	<0	<0	--	<0	<0
Allowable Increment	--	37	19	--	37	19

Source: ESE, 1981.

7.0 ADDITIONAL IMPACTS ON SOILS, VEGETATION, AND VISIBILITY

7.1 IMPACTS ON SOILS AND VEGETATION

Impacts on soils and vegetation due to operation of the proposed sources are expected to be minor. The projected highest, second-highest 3-hour SO_2 concentration of 410 ug/m^3 and annual mean concentration of 22 ug/m^3 (see Table 6-1) are well below levels generally reported for damage to sensitive plant species. As an example of such damage levels, European studies have found one-half hour levels of $3,406 \text{ ug/m}^3$ and long-term means of 393 ug/m^3 to approximate threshold levels for several species (Heck and Brandt, 1977). Other long-term studies have indicated threshold ranges for sensitive species of 47 ug/m^3 to 78 ug/m^3 over two to four months of exposure and 31 ug/m^3 over seven months (Florida Sulfur Oxides Study, Inc., 1978).

Alfalfa, which is commonly thought to be one of the most SO_2 -sensitive species, has a 2-hour threshold level of at least $2,620 \text{ ug/m}^2$ and an 8-hour threshold of 655 ug/m^2 (Heck and Brandt, 1977), far above the predicted impact levels. Based upon results such as these, no discernable impacts are predicted from this the proposed modification.

Particulate matter is generally considered to have a relatively unimportant effect on vegetation (Jacobson & Hill, 1970). A net air quality improvement is predicted over the baseline conditions (see Section 6); as such, no adverse effect on soils and vegetation due to particulate emissions is expected.

Plant species classified as "sensitive" to NO_2 , such as pinto bean, cucumber, lettuce, and tomato, displayed injury when exposed to NO_2 levels of $3,760$ to $4,960 \text{ ug/m}^3$ for a 2-hour period. Extremely resistant species, such as heath, were unaffected by an exposure of $1,900,000 \text{ ug/m}^3$ for 1 hour. Blue grass, orange tree plants, and rye are all classified as "intermediate" in resistance to NO_2 injury.

TSP ISCLT - Key to Sources Modeled

<u>Source No.</u>	<u>Source Description</u>
1	P.B.#4 Projected, DER, EPA Baseline
2	Combo Boiler #4, Projected
3	P.B.#5 Projected, DER, EPA Baseline
4	R.B.#4 Projected, DER, EPA Baseline
5	Smelt #4 Projected, DER, EPA Baseline
6	L.K.#4 Projected, DER, EPA Baseline
7	Proposed Lime Kiln #5
8	Proposed R.B. #5
9	Proposed Smelt Tanks #5
10	Proposed Combo Boiler #5
11	FPL Palatka - DER, EPA Baseline
12	Seminole
13	FPL Putnam - Projected
14	R.B.#1, DER, EPA Baseline
15	R.B.#2, DER, EPA Baseline
16	R.B.#3, DER, EPA Baseline
17	Smelt #1, DER, EPA Baseline
18	Smelt #2, DER, EPA Baseline
19	Smelt #3, DER, EPA Baseline
20	Lime Kiln #1, DER, EPA Baseline
21	Lime Kiln #2, DER, EPA Baseline
22	Lime Kiln #3, DER, EPA Baseline
23	Combo Boiler #4, DER, EPA Baseline
24	*FPL Putnam Baseline
25	Feldspar Corporation
26	Feldspar Corporation
27	Feldspar Corporation
28	National Protein
29	Florida Solite Corporation
30	Florida Solite Corporation
31	Johns Manville Prod. Corporation
32	E.I. Dupont
33	E.I. Dupont

* Note: Stack height should have been 17.67 m. This difference is insignificant, however, and actually would result in a higher baseline concentration and therefore lower increment consumption.

SO₂ ISCLT - Key to Sources Modeled

<u>Source No.</u>	<u>Source Description</u>
1	P.B.#4 - Projected, EPA, DER Baseline
2	Combo Boiler #4 - Projected, EPA, DER Baseline
3	P.B.#5 - Projected, EPA, DER Baseline
4	R.B.#4 - Projected, EPA, DER Baseline
5	Smelt #4 - Projected, EPA, DER Baseline
6	L.K. #4 - Projected EPA, DER Baseline
7	Proposed Lime Kiln #5
8	Proposed R.B. #5
9	Proposed Smelt Tanks #5
10	Proposed Combo Boilers #5
11	FPL Palatka - Projected, DER, EPA Baseline
12	Seminole
13	FPL Putnam - Projected
14	R.B.#1 - DER, EPA Baseline
15	R.B.#2 - DER, EPA Baseline
16	R.B.#3 - DER, EPA Baseline
17	Smelt #1 - DER, EPA Baseline
18	Smelt #2 - DER, EPA Baseline
19	Smelt #3 - DER, EPA Baseline
20	Lime Kiln #1 - DER, EPA Baseline
21	Lime Kiln #2 - DER, EPA Baseline
22	Lime Kiln #3 - DER, EPA Baseline
23	Combo Boiler #4 - Baseline
24	FPL Putnam - Baseline



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

January 27, 1984

Mr. Bruce Mitchell
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
JAN 30 1984
BAQM

Dear Bruce:

Enclosed please find the certification of publication for the public notice pertaining to our PSD permits.

If I can be of further service, please contact me.

Sincerely,

Vernon L. Adams
Supervisor of
Environmental Affairs

mg
enclosure

STATE OF FLORIDA }
 County of Putnam } ss:

Personally appeared before me, a Notary Public for the State of Florida at Large, Joyce Guthrie who deposes and says that she is Business Office Manager of The Palatka Daily News, a daily newspaper printed in the English Language and of general circulation, published in the City of Palatka, in said County and State; and that the attached order, notice, publication and/or advertisement of Notice of Hearing: The State of Florida Department of Environmental Regulation gives notice that a public hearing will be held regarding the proposed issuance of a federal PDS air construction permit to Georgia-Pacific.....

was published in said newspaper Palatka Daily News for a period of One Insertion consecutively, Beginning Jan. 10, 1984 and ending Jan. 10, 1984 said publication being made on the following dates:

January 10, 1984

And deponent further says that The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class mail matter at the postoffice at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, publication and/or advertisement.

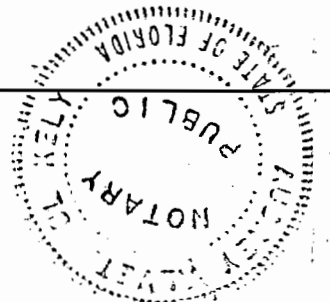
Subscribed and sworn to before me this

13 day of January A. D. 1984

Audrey Alveta Beakely

Notary Public, State of Florida
My Commission Expires Oct. 23, 1984
 Bonded Thru Troy Fain - Insurance
 No. 15248

Joyce Guthrie



PUBLIC NOTICE

NOTICE OF HEARING

The State of Florida Department of Environmental Regulation gives notice that a public hearing pursuant to 40 C.F.R. Part 124 will be held regarding the proposed issuance of a federal PDS (Prevention of Significant Deterioration) air construction permit to Georgia-Pacific for its construction of a combination peat and bark fired boiler, a recovery boiler and associated smelt tanks (2), and a lime kiln at its existing facility in Putnam County. The hearing will be held at the following time and location: 17th day of February, 1984, at 10:00 a.m., St. Johns River Water Management District Office, located 1/4 mile west of the Kay Larkin Airport on Highway 100, Palatka, Florida. Interested members of the public will be provided an opportunity to present written or oral comments at the hearing.

Jan. 10, 1984 15248

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

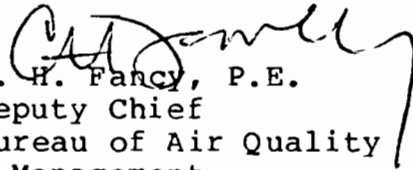
January 5, 1984

Mr. James T. Wilburn, Chief
Air Management Branch
Air & Waste Management Division
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Wilburn:

Enclosed for your information is a copy of the Notice of Hearing for the Gerogia-Pacific federal PSD hearing. This notice is scheduled to appear in the Palatka Daily News no later than January 15, 1984.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

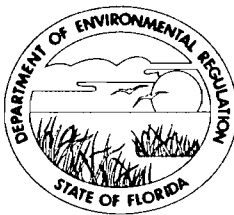
Enclosure

NOTICE OF HEARING

The State of Florida Department of Environmental Regulation gives notice that a public hearing pursuant to 40 C.F.R. Part 124 will be held regarding the proposed issuance of a federal PSD (prevention of significant deterioration) air construction permit to Georgia-Pacific for its construction of a combination peat and bark fired boiler, a recovery boiler and associated smelt tanks (2), and a lime kiln at its existing facility in Putnam County. The hearing will be held at the following time and location: 17th day of February, 1984, at 10:00 a.m., St. John's River Water Management District office, located 1/4 mile west of the Kay Larkin Airport on Highway 100, Palatka, Florida. Interested members of the public will be provided an opportunity to present written or oral comments at the hearing.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 4, 1984


CERTIFIED MAIL - RECEIPT REQUESTED

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32077

Dear Mr. Adams:

Please have the enclosed Notice of Hearing published one time only in the Palatka Daily News no later than Sunday, January 15, 1984.

Sincerely,


C. H. Fancy P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

No. 0158240

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
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(See Reverse)

SENT TO	
Vernon L. Adams	
STREET AND NO.	
P.O., STATE AND ZIP CODE	
POSTAGE	\$
CONSULT POSTMASTER FOR FEES	
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
OPTIONAL SERVICES	
RETURN RECEIPT SERVICE	
SHOW TO WHOM AND DATE DELIVERED	¢
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE	
1/4/84	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

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1. The following service is requested (check one.)

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RESTRICTED DELIVERY

Show to whom and date delivered..... ¢

RESTRICTED DELIVERY.

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2. ARTICLE ADDRESSED TO:

Mr. Vernon L. Adams
Post Office Box 919
Palatka, Florida 32077

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0158240	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1112



NOTICE OF HEARING

The State of Florida Department of Environmental Regulation gives notice that a public hearing pursuant to 40 C.F.R. Part 124 will be held regarding the proposed issuance of a federal PSD (prevention of significant deterioration) air construction permit to Georgia-Pacific for its construction of a combination peat and bark fired boiler, a recovery boiler and associated smelt tanks (2), and a lime kiln at its existing facility in Putnam County. The hearing will be held at the following time and location: 17th day of February, 1984, at 10:00 a.m., St. John's River Water Management District office, located 1/4 mile west of the Kay Larkin Airport on Highway 100, Palatka, Florida. Interested members of the public will be provided an opportunity to present written or oral comments at the hearing.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Bill Thomas
Larry George
Clair Fancy
Bill Blommel
Bill Davis
Steve Smallwood
Nancy Wright

FROM: Bruce Mitchell *BM*

DATE: January 20, 1984

SUBJ: Requested meeting with the American Association of Retired People (AARP) on January 25, 1984 (Wednesday), at 11:30 AM, in Florahome, Florida.

The AARP would like to have representatives from the bureau that have the expertise in air monitoring related topics (i.e. siting, modeling for siting, maintenance and operation of monitors, etc.) to attend a meeting at the referenced date, time, and location. I would appreciate support on this matter.

Florahome is located in Putnam County and AARP is concerned about their air quality. The representatives of the bureau that might be considered are:
Bruce Mitchell
Larry George
Bill Davis
Brian Kerckhoff

Nancy Wright has already expressed her desire to attend this meeting, but has not yet confirmed that she can attend it.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 16, 1984

CERTIFIED MAIL - REQUESTED RECEIPT

Mary P. Webster
P. O. Box 146
Florahome, Florida 32635

Dear Mrs. Webster:

In our last phone conversation, you said that you would let me know when your association was going to hold a January, 1984 meeting so that representatives of the Bureau of Air Quality Management could attend and entertain comments, questions, etc., concerning air quality related issues in Putnam County. Since January is here, have you already scheduled a meeting? If so, would you please let me know by calling me at (904)488-1344 or write to me at the above address.

Thank you for your cooperation.

Sincerely,

R. Bruce Mitchell, Engineer
Bureau of Air Quality
Management

RBM/ks
cc: Nancy Wright

P 408 530 366

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mary P. Webster	
Street and No. PO Box 146	
P.O., State and ZIP Code Florahome, FL 32635	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
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PS Form 3800, Feb. 1982

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
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 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY.
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(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Mrs. Mary P. Webster
 PO Box 146
 Florahome, FL 32635

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P408530366	

 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
G. R. Webster

4. DATE OF DELIVERY
 1/17/84

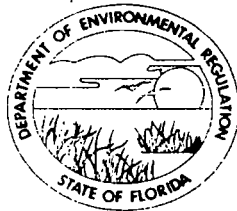
5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

FLORAHOME, FL
 JAN 17 1984
 USPO
 K5

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 16, 1984

CERTIFIED MAIL - RECEIPT REQUESTED

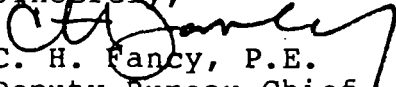
Mary P. Webster
P. O. Box 146
Florahome, Florida 32635

Dear Mrs. Webster:

The Bureau of Air Quality Management has scheduled your association's requested federal public hearing for February 17, 1984, at 10:00 a.m. to be held at the St. Johns River Water Management District Office building located in Palatka, Florida. This building is approximately 1/4 mile west of the Kay Larkin Airport on Highway 100.

If there are any questions please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,


C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/BM/s

cc: Nancy Wright

P 408 530 364

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
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(See Reverse)

Sent to Mary P. Webster	
Street and No. PO Box 146	
P.O., State and ZIP Code Florahome, FL 32635	
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Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
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PS Form 3800, Feb. 1982

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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1. The following service is requested (check one.)

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RESTRICTED DELIVERY
Show to whom and date delivered..... \$

RESTRICTED DELIVERY.
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(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mrs. Mary P. Webster
PO Box 146
Florahome, FL 32635

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P408530364	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

J. P. Webster

4. DATE OF DELIVERY
1/17/84

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

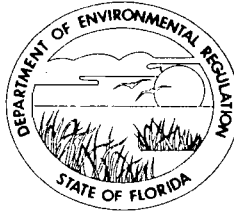
USPS MAIL SERVICE
JAN 17 1984
FLORAHOME, FL
USPS MAIL SERVICE
LEB'S INITIALS
LS

3. file

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

November 4, 1983

CERTIFIED MAIL - RECEIPT REQUESTED

Mrs. Mary P. Webster
P. O. Box 146
Florahome, Florida 32635

Dear Mrs. Webster:

In response to our phone conversations, I will attempt to answer questions that both you and your affiliation, AARP, have raised. These questions are:

1. What type of monitors are located in Putnam County, where are they located, and who operates the monitor(s)?
2. Will there be any more monitors placed in Putnam county?
3. Are the monitors described in #1 adequate for monitoring Putnam County, specifically in the western sector?
4. How do the citizens get prompt notification if and when there is an air pollution problem in the lower atmosphere such that normal activity is affected?

Presently, there are two Hi-Vol monitors operating in Putnam county and serviced by Department of Environmental Regulation (DER) personnel with the Northeast District office located in Jacksonville, Florida. A Hi-Vol monitor collects total suspended particulate matter (TSP) every 6 days on a filter medium, which is removed for lab analysis.

A map is enclosed marking the approximate locations of the Hi-Vol monitors. The Kay-Larkin Airport monitor has been in operation at least since 1975 (based on in-house data) and has UTM coordinates of Zone 17, 433.42 km East and 3281.35 km North. The Long Elementary School monitor was placed into service on August 3, 1983, and has UTM coordinates of Zone 17, 433.43 km East and 3281.47 km North. Both monitors comply with the EPA monitor siting criteria as found in the Federal Register.

Before any type of monitor is sited for a specific location, a modeling review is conducted to predict the pollutant's maximum impact area. The models used are EPA approved and recommended models. Some of the information input into the model are meteorological data, such as wind speed and wind direction,

P 408 530 352

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(See Reverse)

Sent to Mrs. Mary P. Webster	
Street and No. P.O. Box 146	
P.O., State and ZIP Code Florahome, FL 32635	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, Feb. 1982

PS Form 3811, Jan. 1973

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered..... \$

Show to whom, date and address of delivery..... \$

RESTRICTED DELIVERY

Show to whom and date delivered..... \$

RESTRICTED DELIVERY.

Show to whom, date, and address of delivery. \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mrs. Mary P. Webster
P.O. Box 146
Florahome, FL 32635

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P408530352	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

M. Webster

4. DATE OF DELIVERY

11/9/83

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RS.

FLORAHOME, FL
NOV 9 1983
USPO

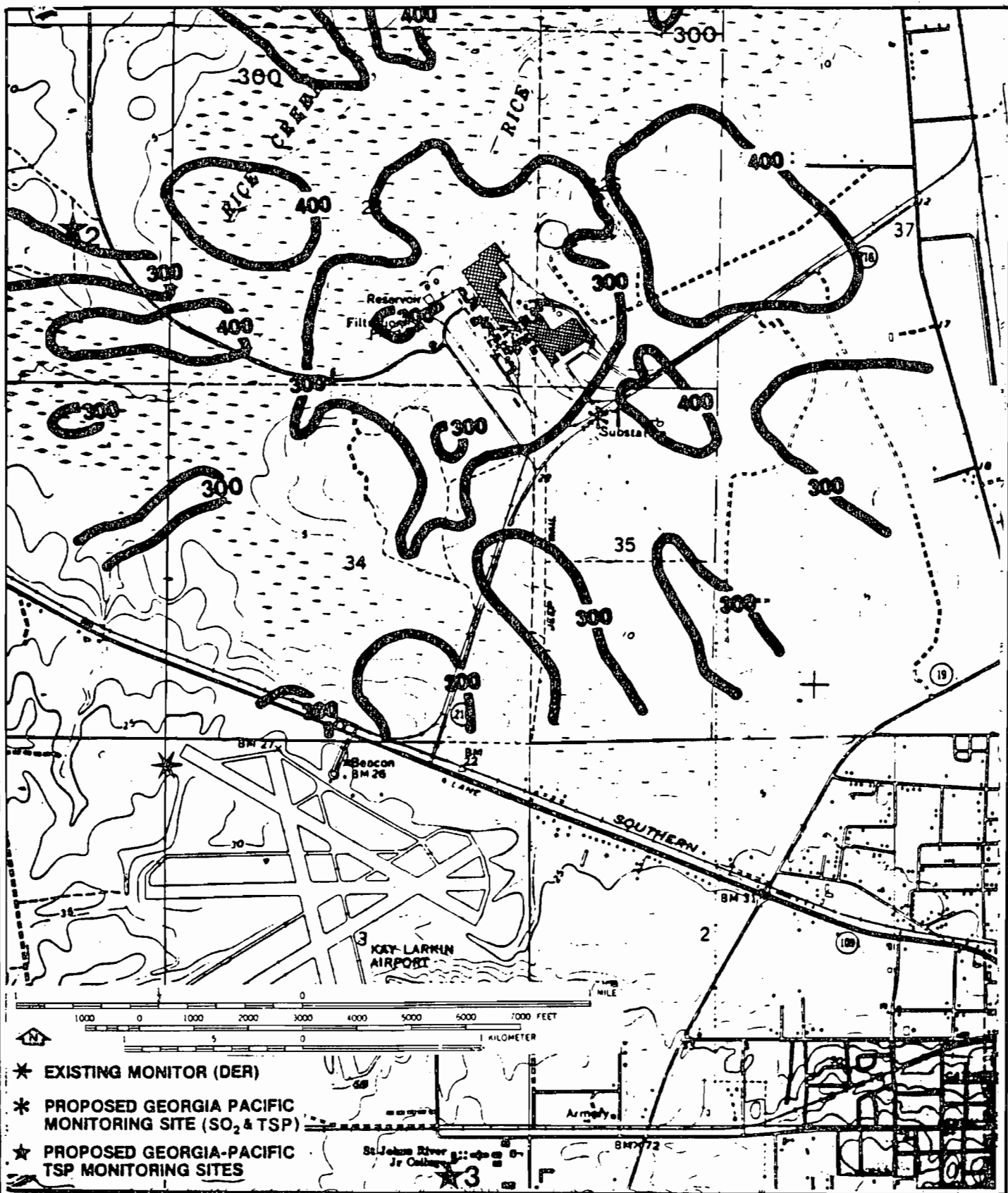


Figure 3-7

IMPACT PREDICTIONS FOR 3-HOUR SO₂:
 PROJECTED CONDITIONS (μg/m³)

GEORGIA-PACIFIC
 CORPORATION

SOURCE: ESE. 1981.

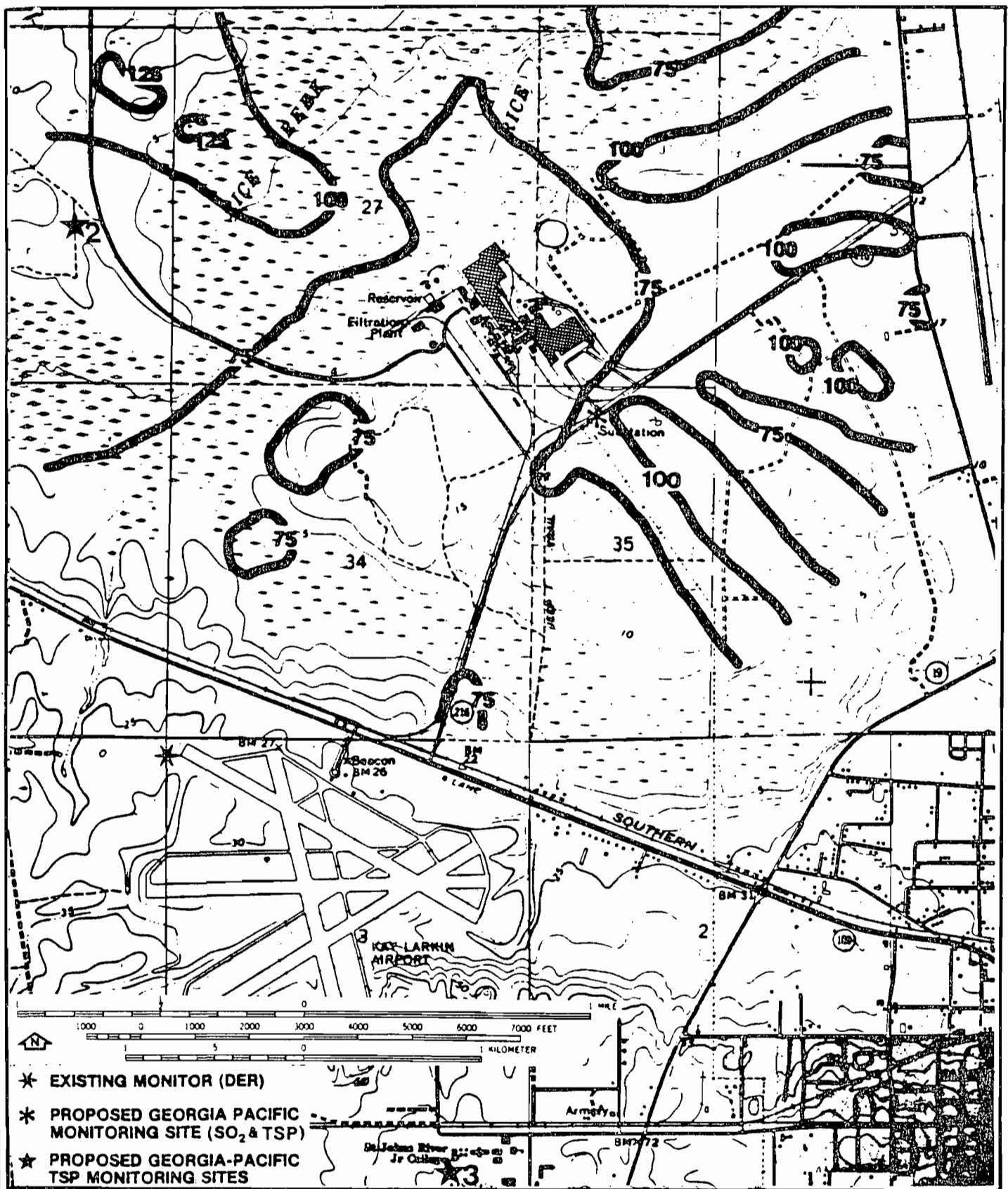


Figure 3-6

IMPACT CONDITIONS FOR 24-HOUR SO₂ :
 GEORGIA-PACIFIC NEW SOURCES ($\mu\text{g}/\text{m}^3$)

Projected conditions

SOURCE: ESE, 1981.

GEORGIA-PACIFIC
 CORPORATION

D. NAAQS Analysis

Given background pollutant concentrations in the area due to distant and natural sources, modeling results predict that the Georgia-Pacific mill, as proposed to be modified, will not cause or contribute to a violation of any ambient air quality standard. Background concentrations considered typical of remote areas were used in the NAAQS analysis. The PM background values used in the analysis were slightly higher than those observed at the background site during the four-month ambient monitoring program conducted by Georgia-Pacific.

Results of the NAAQS analysis are summarized in the following table.

<u>Pollutant, Units, and Time Average</u>	<u>Estimated Background Concentration</u>	<u>Predicted Impact of Modified Mill</u>	<u>Total Impact</u>	<u>NAAQS</u>
SO ₂ (ug/m ³)				
Three-hour*	20	409	429	1300**
24-hour*	20	113	133	365
Annual	20	22	42	80
PM (ug/m ³)				
24-hour*	80	28	108	150***
Annual	40	4	44	75
NO ₂ (ug/m ³)				
Annual	20	19	39	100
CO (mg/m ³)				
One-hour*	1	<1	1	40
Eight-hour*	1	<1	1	10

* Not to be exceeded more than once per year.

** Secondary standard.

*** Secondary standard; primary standard is 260 ug/m³.

Mary P. Webster
November 4, 1983
Page Two

the most recent pollutant emissions from the surrounding area by source, and various stack parameters. Once the results of the model have been obtained, either in the form of concentrations (ug/m^3) at various distances from the source or in the form of an isopleth analysis (see attachment), then the type of monitor is selected and the location is sited, again according to the monitor siting criteria as found in the Federal Register. Finally, permission must be obtained from the owner of the property that was selected as the best location. Many times the latter has been the only problem with placing a monitor into service. Other problems, but not all, are safety, accessibility, electricity, logistics, and economics.

Earlier this year, DER personnel with the Bureau of Air Quality Management made a trip to Putnam County to review the siting criteria for monitors. Modeling had predicted the pollutant's maximum impact areas. Using the siting criteria, the best locations for monitors were the Long Elementary School and an area northwest of the Georgia-Pacific Corporation, which happens to be an area with a high water table and much vegetation. A monitor for TSP has since been placed into service at the Long Elementary School. However, some of the problems listed above make it difficult to place any type of monitor in the northwest impact area.

A sulfur dioxide (SO_2) monitor has also been recommended for Putnam County and the preferred location is the Long Elementary School. As soon as funds are allocated, the installation will become a reality. However, the maximum predicted SO_2 impacts (see attachment) are well below the Florida 3-hour and 24-hour air quality standards.

Based on modeling, and on the professional judgement of DER personnel, Putnam County is adequately monitored for those pollutants that are predicted to impact the county. However, this fact will not prevent further installation of various types of monitors to provide background data collection as funding and priorities allow.

Whenever there is a pollution problem of some kind, the various media--radio, paper, and television--usually provide enough information so that the citizens know what to do and are informed. Weather conditions are forecast in advance such that the majority of the citizens are aware of what to expect for more than 24 hours. However, the media are not always aware of many local and isolated situations that are pollution related. Therefore, if you are confronted with an immediate pollution related situation, you should inquire by calling the DER's

Mary P. Webster
November 4, 1983
Page Three

Northeast District office in Jacksonville, its branch office in Gainesville, or your local law-enforcement agency.

I hope the information provided will answer all of your concerns about monitoring pollutants in Putnam County. If you have further questions, please write to me at the above address or call Bruce Mitchell at (904)488-1344. Also, if you and your organization, AARP, still wish to have the federal Public Hearing (40 CFR 124), please advise as soon possible.

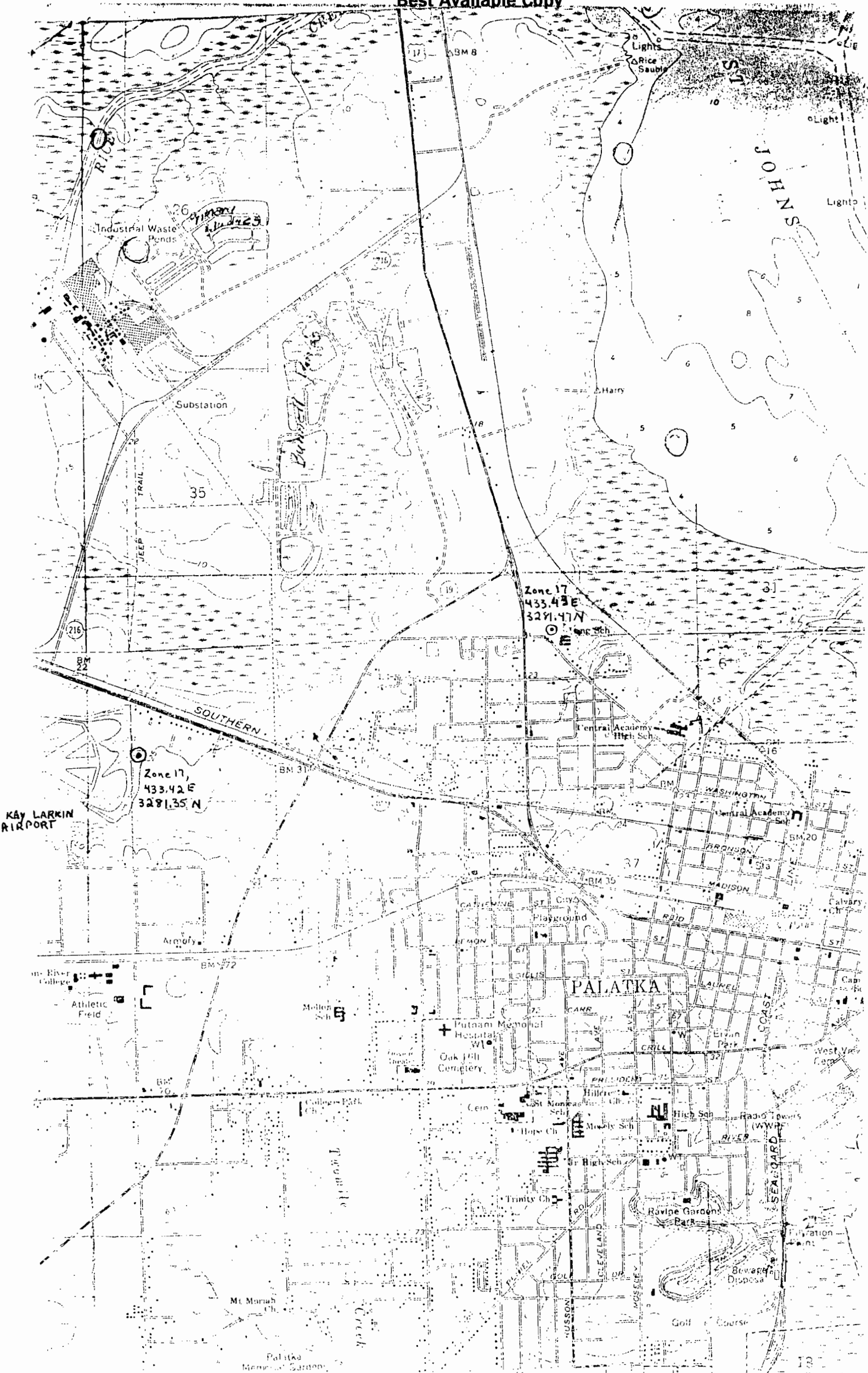
Sincerely,



C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

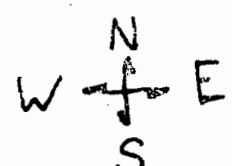
CHF/BM/s

cc: Nancy Wright
Vernon Adams



PALATKA
3780-001-F02

DER Hi-Vol locations (2)
1. Kay Larkin Airport. (Existing)
2. Long Elementary School (In-Service 8/4/83)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OCT 19 1983

REF: 4AW-AM

Ms. Martha Hall
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
OCT 24 1983
BAQM

Dear Ms. Hall:

On October 11, 1983, my staff discussed with Mr. Clair Fancy the designation under 40 CFR 124.12(b) of Presiding Officers for certain upcoming PSD public hearings.

Therefore, pursuant to 40 CFR 124.12(b), I hereby designate Mr. Clair Fancy as Presiding Officer for the public hearing on the Georgia-Pacific Corporation permit application. In addition, I designate Mr. Walter Starnes as Presiding Officer for the public hearing on the Florida Crushed Stone Company application with Mr. Dick Arbes as alternate.

If you need any further assistance, please feel free to contact Mr. James T. Wilburn, Chief, Air Management Branch at 404/881-3043.

Sincerely yours,

John A. Gilt, Deputy for
Charles R. Jeter
Regional Administrator

cc: Clair Fancy, Deputy Chief
Bureau of Air Quality Management



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

June 24, 1983

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
JUN 28 1983
BAQM

Dear Mr. Fancy:

Pursuant to your request of May 13th we collected several samples of peat representative of the peat we intend to burn in our proposed peat boiler. These samples were analyzed for those heavy metals requested in your letter which are regulated by the Clean Air Act. ESE then estimated our emissions and compared them to the significant levels. It is their conclusion that the emission levels are low and do not require any additional modeling or change in control strategy.

If you have any questions or if I can be of further service, please contact me.

Sincerely,

V. L. Adams

mg

attachment

cc R. C. Sherwood



**ENVIRONMENTAL SCIENCE
AND ENGINEERING, INC.**

June 21, 1983
83 137 100

Mr. Vernon Adams, Technical Services
Georgia-Pacific Corporation
PO Box 919
Palatka, Florida 32077

Dear Vernon:

ESE has completed an analysis of representative peat samples and estimation of emissions of heavy metals regulated under the Clean Air Act for the proposed Combination Boiler No. 5 firing peat, as requested in the Department of Environmental Regulation's (DER) letter to you of May 13, 1983. The heavy metals which are regulated under the Clean Air Act and which were named in DER's letter are mercury, beryllium and lead. The average content of the heavy metals was found to be: less than 0.09 mg/kg of mercury; 1.0 mg/kg of beryllium; and 6.2 mg/kg of lead, all on a dry weight basis.

The laboratory technique for analysis of these samples consisted of EPA Method 200.7 - Inductively Coupled Plasma - Atomic Emission Spectrometric Method for Trace Element Analyses of Water and Wastes. Since the measured mercury contents were below the minimum detectable limit of this technique, further analysis of the peat samples for mercury was conducted using Method 245.5 - Mercury in Sediment (Manual Cold Vapor Technique), which utilizes atomic absorption. The analysis using this technique also resulted in levels below the minimum detectable limit.

Emission estimates for each of these pollutants have been developed for the proposed Combination Boiler No. 5 firing peat, and calculations are attached. Estimated annual maximum emissions are less than 0.043 tons per year of mercury, 0.0004 tons per year of beryllium, and 0.003 tons per year of lead. The Prevention of Significant Deterioration (PSD) Significant Emission Rates for these pollutants are 0.1, 0.0004, and 0.6 tons per year for mercury, beryllium and lead, respectively. The estimated maximum emissions due to peat firing in Combination Boiler No. 5 are well below the Significant Emission Rates for mercury and lead, and just equal to that for beryllium. Therefore, PSD review is not required for mercury and lead emissions.

Mr. Vernon Adams
Page Two
June 21, 1983

Beryllium will be emitted in the solid phase as particulate matter from peat combustion. The proposed Combination Boiler No. 5 will be equipped with an electrostatic precipitator to control particulate matter emissions from the boiler, and this control technology has been found to represent Best Available Control Technology by the DER. Additional controls to further reduce particulate matter and therefore beryllium emissions would not be economically justified (ESP is already 99 percent efficient), and based upon the small annual emission rate, would not be justified on the basis of air quality impacts.

Please call if you have any questions concerning this information.

Sincerely,



David A. Buff, P.E.
Senior Engineer
Air Resources Department

DAB/ds
Enclosures

cc: Peter Cunningham
Tom Park

EMISSION ESTIMATES - REGULATED HEAVY METALS
GEORGIA PACIFIC CORPORATION PROPOSED COMBINATION BOILER NO. 5

1. Mercury:

Mercury from coal combustion is emitted primarily in the gaseous phase¹. For purposes of estimating mercury emissions from peat combustion, it was also assumed that all emissions are in the gaseous form. It was therefore assumed that the electrostatic precipitator (ESP) controlling particulate emissions from the proposed Combination Boiler No. 5 does not remove any mercury from the exhaust gases.

Maximum peat consumption = 217,869 lb/hr @ 50% moisture =
108,935 lb/hr (dry)

From attached analysis, mercury content is less than 0.09 mg/kg (dry).
Assuming a level of 0.09 mg/kg:

$108,935 \text{ lb/hr} \times 0.09 \text{ mg/kg} \times 10^{-3} \text{ g/mg} \div 1000 \text{ g/kg} =$
 0.0098 lb/hr

$0.0098 \text{ lb/hr} \times 8760 \text{ hr/yr} \div 2000 \text{ lb/ton} = 0.043 \text{ tons/yr}$

2. Beryllium

Beryllium is emitted from coal combustion in the solid phase¹, and the same was assumed for peat combustion. Assuming the same level of beryllium content in the particulate matter exiting the ESP as is contained in the peat, and average of peat samples:

Maximum particulate matter emissions = 100.59 lb/hr
Average beryllium content of peat = 1.0 mg/kg
Maximum beryllium emissions = $100.59 \text{ lb/hr} \times 1.0 \text{ mg/kg} \times$
 $10^{-3} \text{ g/mg} \div 1000 \text{ g/kg} = 0.00010 \text{ lb/hr}$

$0.00010 \text{ lb/hr} \times 8760 \div 2000 = 0.0004 \text{ tons/year}$

3. Lead

Using same assumptions as for beryllium:

Average lead content of peat = 6.2 mg/kg

Maximum lead emissions = $100.59 \text{ lb/hr} \times 6.2 \text{ mg/kg} \times 10^{-3} \text{ g/mg}$
 $1000 \text{ g/kg} = 0.00062 \text{ lb/hr}$

$0.00062 \text{ lb/hr} \times 8760 \div 2000 = 0.003 \text{ tons/yr}$

¹Health Impacts, Emissions, and Emission Factors for Noncriteria Pollutants Subject to De Minimis Guidelines and Emitted from Stationary Conventional Combustion Processes, EPA-450/2-80-074, June 1980.

June 8, 1983

Mrs. Mary Webster
Post Office Box 146
Florahome, Florida 32635

Re: Public hearing request on Georgia-
Pacific federal PSD permit

Dear Mrs. Webster:

As we discussed on March 31, 1983, I have tracked down more information on the air pollution monitors the Department plans to locate in the Palatka area. The Department originally planned to put two particulate monitors in the area: one at the community college, and one at Long School. At this time, we have received permission to place a monitor at Long School, and it will probably be installed by June 17th. We have run into a snag, however, with the community college location. We requested that the monitor be installed on the roof of the library building because of the availability of easy and safe access for sampling. That request was denied and the alternative suggested would have been unsafe for sampling personnel. We are still looking for an alternate sampling location in this area but we have not been successful so far. The monitor must be placed away from trees and dirt roads and at least four feet off the ground.

A third monitor specifically for SO₂ (sulfur dioxide) emissions has been recommended to be located at Long School. The funding for this monitoring must come from an EPA grant, which will take several months for processing and approval. All three monitors will be operated and sampled by the Department.

Regarding your hearing request on behalf of the American Association of Retired Persons, the Department will schedule and conduct a public hearing in the Palatka area on behalf of the EPA. At this time, the Department has requested that Georgia-Pacific provide additional information which is necessary

Mrs. Mary Webster
June 8, 1983
Page Two

before the Department can make a final recommendation to EPA. It would be advisable to give Georgia-Pacific a reasonable time to respond with the requested information so that the new information might also be considered at the hearing. I will inform you of the hearing date and location as soon as it is scheduled.

When we had our telephone conversation on March 31st, you mentioned an article in the Palatka newspaper referring to a Georgia-Pacific request to exceed Department standards. At least as far as the air permit is concerned, I can't find any evidence of such a request. Both the State and federal permit applications for burning peat have been considered based on the requirement that Georgia-Pacific meet all applicable Department rules. The only Georgia-Pacific request that I'm aware of at this time is a request to extend the time for completion of construction under the state air permit. I don't believe that the Department has responded to the request for an extension yet.

Please call or write me if you have any questions or comments.

Sincerely,

Nancy E. Wright
Assistant General Counsel

NEW/tb

Code	Date of Response	Question	Affected Regulation	Determination	Discussion
PSD/56 (cont.)	7/1/78	c) What constitutes a reasonable time?	§52.21		In order to assure that construction proceeds in a continuous manner and is completed within a reasonable time, the regulations require that a break in construction of greater than 18 months or failure to commence construction within 18 months of PSD permit issuance will generally invalidate a source's PSD permit. <u>This 18 month period may be extended by the Administrator upon a satisfactory showing that an extension is justified.</u>

Ref.	Question	Affected Reqs	Determ.	Discussion
PSD/75 10/31/78	On August 18, 1978, the Pittston Co. received a PSD permit to construct refinery and marine terminal. Would EPA agree that Pittston need commence construction no earlier than 18 months from permit issuance, that is, no earlier than Feb. 18, 1980?	52.21(1)(4)	No	Sections 52.21(1)(2)(4), when read together, require a permittee under 52.21(1)(4) to commence construction within the same amount of time that would be the case for a person issued the permit just before March 1, <u>i.e.</u> , within one year and 18 days from permit issuance. In the case of Pittston, construction must commence on or before September 5, 1979.
PSD/76 11/15/78	a) Does a major source which (1) has allowable emissions equal to or greater than 100 tons/year, and is therefore subject to the Emission Offset Ruling (44 FR 3274), and (2) would impact no clean areas require PSD review?	52.21	Cond.	Such a source need not obtain a PSD permit if it has demonstrated that no clean area will be impacted and if the determination of no clean area impact has been subject to public review in accordance with 52.21(r).
	b) Does §52.21(1)(5) exempt a source which, with respect to a particular pollutant, would affect only dirty areas but would not be subject to the Offset Policy because its allowable emissions were less than 100 tons/year?	52.21(1)(5)	No	Section 52.21(1)(5) exempts only sources which are subject to the more stringent requirements of the Interpretative Ruling. <u>Update:</u> The Interpretative Ruling was amended 1/16/79, and now applies to sources with potential emissions of 100 tons or more per year. It is no longer possible for a source to have an emission level which is above the PSD cutoff but below the IR cutoff.

CODE	REFERENCE	QUESTION	APPLICABLE REGULATION	PERMITTING SITUATION	DISCUSSION
PSD 117	10/3/80	Are sources which have been shutdown for 2 years and removed from the emissions subject to PSD review upon reactivation?	52.21	Conditional	While EPA continues to maintain that sources which are shutdown for more than 2 years and are removed from the State's emission inventory are presumed to be permanent shutdowns, and thus subject to PSD upon reactivation, the source can rebut this presumption by providing evidence that the shutdown was not intended to be permanent. In addition, with the inclusion of the contemporaneous provisions in the 8/7/80 PSD amendment, it appears that shutdowns will have to be considered in order for sources to obtain credit for contemporaneous decreases. Future guidance will be provided concerning this issue.
PSD 118	11/25/80	How should the firing rate of a facility which will co-fire municipal waste and papermill sludge be calculated for PSD applicability purposes?	52.21(b) (1)(1)(a)		The firing rate should be based on the solids content of the municipal waste and the dry weight of the papermill sludge, to be consistent with NSPS applicability.
PSD 119	(Memo from Barber to Gardbring) 11/26/80	May a source which was issued a PSD permit be granted an extension on the commencement of construction date based on a decrease in consumer demand?	52.21(a)(2)	Conditional	Although agency policy is still being formulated on this issue, the following steps should be taken when evaluating such a request: 1. Assure company projections are reasonable. 2. Coordinate with the State where source is locating. 3. Publish Federal Register notice on proposed extension and solicit comments. 4. For phases projects, alert source that an extension, if granted will apply only to the first phase.



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

May 31, 1983

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
JUN 03 1983
BAQM

Dear Mr. Fancy:

In order to document the permanent shutdown of Hudson's lime kilns 1-3 and recovery boilers 1-3 at the Palatka mill, I have prepared the attached affidavit. If this is not sufficient documentation, your permit files should contain the required information. We will be glad to supply more information if needed.

In regard to the requested public hearing, please send us a copy of the petition from the Florahome Chapter of the American Association of Retired Persons.

Our engineers are currently performing the requested testing and modeling for heavy metals. We will forward this information to you when it becomes available.

If you have any questions or if I can be of further service, please call me.

Sincerely,

Vernon L. Adams
Supervisor of Environmental
Affairs

:la
Attachment
cc: R. C. Sherwood



Georgia-Pacific Corporation

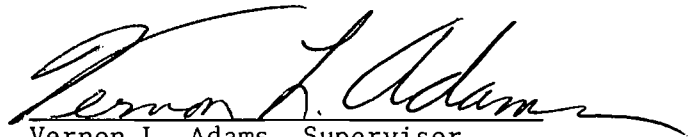
Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

May 31, 1983

TO WHOM IT MAY CONCERN:

I hereby swear I have personal knowledge that Hudson Pulp & Paper Corp. has permanently shut down and dismantled Lime Kilns No. 1, No. 2, and No. 3, and Recovery Boilers No. 1, No. 2, and No. 3, at its Palatka, Florida plant.

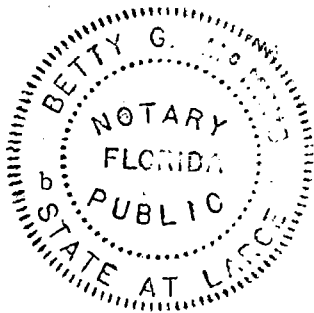

Vernon L. Adams, Supervisor
Environmental Affairs

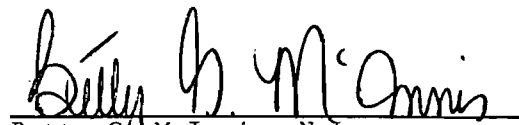
b

STATE OF FLORIDA

COUNTY OF PUTNAM

Sworn to me on this 31st day of May, 1983. Witness my hand and official seal at Palatka, Putnam County, Florida. My commission expires March 7, 1986.




Betty G. McInnis, Notary

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Steve Smallwood
Mary Smallwood

THRU: Bill Thomas ^{BT}
Clair Fancy ^{CF}

FROM: Bruce Mitchell ^{BM}

DATE: May 16, 1983

DER
MAY 18 1983
BAQM

RECEIVED
MAY 17 1983
Dept. of Environmental Regulation
Office of General Counsel

SUBJ: Georgia-Pacific Corporation's request for an extension of the expiration date for the construction permit No. AC 54-43773 for the Combination Boiler No. 5.

The BAQM received a request letter (Attachment 1) for the above referenced subject on March 11, 1983. Bill Thomas and I spoke with John Bottcher about the request and he determined that the request was a licensing procedure and that we (CAPS) would be bound by a 90-day clock. Therefore, May 16 would be day 66 of the 90-day clock.

On May 13, a letter (Attachment 2) was mailed to Georgia-Pacific Corporation, but it did not address the issue at hand. Is there any reason(s) to delay the granting and issuance of their request.

*NO. file
5-19-83*

1. Since the issuance of the state permit, heavy metal questions have arisen.
2. Have a hand look at the project, because if heavy metals (spec. mercury) is of a concern, an ESP is not the acceptable control device.

ATTACHMENT 1



Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

March 9, 1983

Mr. Clair Fancy
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

MAR 11 1983

BAQM

Dear Clair:

In August of 1982 we requested an extension of construction permit No. AC54-43773 which expires in December 1983 for Georgia-Pacific's No. 5 Combination Boiler. Your office suggested that we should re-submit this request in March of 1983. We again request the extension of construction permit No. AC54-43773 through December of 1985. The situation described in our August 24th letter still exists.

If I can be of any assistance, please contact me.

Sincerely,

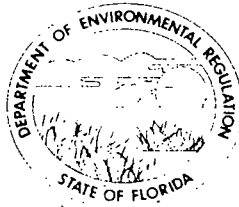
Vernon L. Adams
Supervisor of
Environmental Affairs

mg
Copy of 8/24/82 Ltr. Enclosed

cc D. A. Buff - Environ. Science & Engr. - Gainesville
D. A. Martinez
R. C. Sherwood

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 27, 1982

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32077

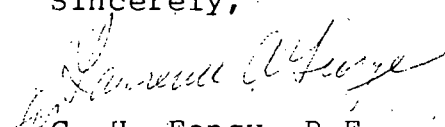
Re: Expiration Date Extension Request of Construction Permit
No. AC 54-43773: No. 5 Combination Boiler

Dear Mr. Adams:

The Bureau is in receipt of your request for the extension of the expiration date of the referenced construction permit. After review of this request, the Bureau recommends that the request be resubmitted approximately 9 months (April, 1983) before the referenced permit expires, December 31, 1983.

If there are any questions, please call me at (904) 488-1344 or write to me at the above address.

Sincerely,


C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/RBM/bjm

Enclosure

cc: John Ketteringham
Martha Harrell Hall



BEST AVAILABLE COPY
Georgia-Pacific Corporation

Hudson Pulp & Paper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32077
Telephone (904) 325-2001

August 24, 1982



Mr. Clair Fancy
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
Office of General Counsel

Dear Clair:

The current construction permit No. AC54-43773 for Georgia-Pacific's No. 5 Combination Boiler expires in December of 1983. It is our intent to burn peat harvested from within the State of Florida as the main fuel in this unit. We have met delays in obtaining the required environmental permits to harvest the peat and we wish to delay construction of this boiler at this time. We hereby request an extension of this construction permit through December 1985.

If you have any comments or questions please contact me at 904/325-2001.

Sincerely,

Vernon L. Adams
Supervisor of
Environmental Affairs

mg

cc Mr. D. A. Buff
Mr. D. A. Martinez
Mr. R. C. Sherwood

BEST AVAILABLE COPY

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Cher Faney

INITIAL

DATE

2.

Bill - please have

DER

INITIAL

DATE

3.

letter drafted extending these permits as requested

SEP 08 1982

INITIAL

DATE

4.

BAQM

INITIAL

DATE

REMARKS:

I have no problems with extending either one. I would like to know why G-P is asking so early, though. (P.S. Talked to district lawyer for Jacksonville. G-P has been unable to get dredge & fill permit to mine peat. They are now trying to get approval as a pilot project.)

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

Mark Hall

DATE

9/8

PHONE

BEST AVAILABLE COPY

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP	ACTION NO.
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>Marti Hall</i>	INITIAL
	DATE
2.	INITIAL
	DATE
3.	INITIAL
	DATE
4.	INITIAL
	DATE

REMARKS:

Do you see any problems with granting these applications? I would want them for refined rules; tell Georgia Dept. to reapply when it gets closer to application date.

RECEIVED
SEP 7 1982
Dept. of Environmental Regulation
Office of General Counsel

INFORMATION
REVIEW & RETURN
REVIEW & FILE
INITIAL & FORWARD
DISPOSITION
REVIEW & RESPONSE
PREPARE RESPONSE
FOR MY SIGNATURE
FOR YOUR SIGNATURE
LET'S DISCUSS
SET UP MEETING
INVESTIGATE & COPY
INITIAL & FORWARD
DISTRIBUTE
CONCURRENCE
FOR PROCESSING
INITIAL & RETURN

FROM: <i>Clair Joney</i>	DATE <i>9/7</i>
	PHONE

ATTACHMENT 2

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

May 13, 1983

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32077

RE: Federal PSD Permit No. PSD-FL-079

Dear Mr. Adams:

Three matters related to the processing of the federal PSD permit for the expansion of your Putnam County mill have arisen since we issued our Technical Evaluation and Preliminary Determination on January 18, 1983:

1. Comments (enclosed) have been received from EPA Region IV (Attachment 1).
2. A public hearing has been requested by the Florahome Chapter of the American Association of Retired Persons.
3. A concern for emissions of heavy metals (see those contained in Attachment 2), particularly mercury, from the drying and burning of peat has arisen on our part.

Each of these items will need to be resolved before we can forward a final determination to EPA Region IV.

On the question of heavy metals (see those contained in Attachment 2), our concern derives from the fact that in evaluating the water quality impacts of harvesting peat the department learned that such metals may accumulate in peat deposits. If you have not already done so, we would like you to analyze a representative set of samples of the peat you plan to use for its heavy metal content and estimate the potential emissions of these metals to the atmosphere. In the case of mercury, which is a regulated air pollutant, a BACT determination and air quality impact analysis will be required if emissions will equal or exceed 200 pounds per year.


As soon as the heavy metals question is resolved, the requested public hearing can be scheduled. Our permitting staff will be prepared to answer any questions the public may have on

Mr. Vernon L. Adams
Page Two
May 13, 1983

our preliminary determination. You will probably also want to have your technical staff available for the hearing.

Following the hearing, we will forward to EPA a final determination addressing the heavy metals question, any issues which arise at the hearing, and the comments received from EPA. You could assist us in responding to the EPA comments by providing us with the documentation asked for in comment number one of the enclosed letter.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/bm

cc: J. Wilburn, EPA Region IV
J. Ketteringham, NE District

ATTACHMENT 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 11 1983

REF: 4AW-AM

DER

FEB 17 1983

BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301 - 8241

RE: PSD-FL-079-Georgia-Pacific Corporation

Dear Mr. Fancy:

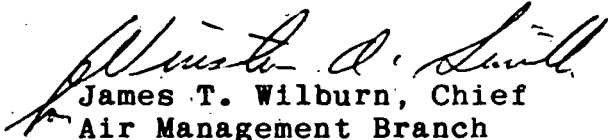
My staff has completed its review of your preliminary determination for Georgia-Pacific Corporation's proposed expansion of their existing kraft mill located in Palatka, Putnam County, Florida. Our comments are as follows:

1. So that our files may be complete, please submit sufficient documentation verifying the permanent shutdown of lime kilns 1-3 and recovery boilers 1-3.
2. The determination did not discuss why assumed background values (20 ug/m^3) were used in the NAAQS analysis instead of the ambient monitoring data that had been obtained.
3. Page 12 gives the time period for performing the ambient monitoring as being from June 12, 1981 to December 12, 1981, however the narrative states only four months of data had been obtained. Furthermore, short term monitoring (four months) during the summer months for TSP is acceptable, however EPA does require at least one year's worth of SO_2 monitoring prior to applying for a PSD permit. Four summer months and four winter months are critical periods for SO_2 ambient concentrations.

PAGE 2

If you have any questions concerning this matter, please contact Mr. Richard S. DuBose, Chief, Air Engineering Section at 404/881-7654.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "James T. Wilburn".

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

ATTACHMENT 2

Table 8. Estimate of Average Water Quality from North Florida Peat Harvesting Runoff Prior to Treatment (Revised 7/8/82)

Parameter	Unit	Existing Background Average Cow Bay Water Quality	Estimated Untreated Harvesting Runoff Water Quality	FAC 17-3 Class III Standard
Dissolved Oxygen	mg/L	3.5	4.0	>5.0
pH	units	3.6	3.5 - 4.5	6.0 - 8.5
Color	units	377	400	N/A
BOD	mg/L	1.2	<5	NNS
Total Nitrogen	mg/L	1.63	2.5	NNS
Total Phosphorus	mg/L	0.02	0.1	NNS
Calcium	mg/L	2.4	3	N/A
Chromium	ug/L	<6	20	50.0
Magnesium	mg/L	0.9	1	N/A
Iron	mg/L	0.486	0.5	1.0
Beryllium	ug/L	<1	<1	11.0
Copper	ug/L	<6	<6	30.0
Lead	ug/L	28.5	<25	30.0
Nickel	ug/L	<12	<17	100.0
Mercury	ug/L	0.6	0.6	0.2
Selenium	ug/L	16.3	<17	25.0
Zinc	ug/L	23	75	30.0

Note: N/A = no standard.
NNS = no numerical standard.

Source: ESE, 1982.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 11 1983

REF: 4AW-AM

DER

FEB 17 1983

BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301 - 8241

RE: PSD-FL-079-Georgia-Pacific Corporation

Dear Mr. Fancy:

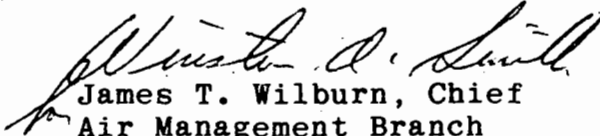
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1. So that our files may be complete, please submit sufficient documentation verifying the permanent shutdown of lime kilns 1-3 and recovery boilers 1-3.
2. The determination did not discuss why assumed background values (20 ug/m³) were used in the NAAQS analysis instead of the ambient monitoring data that had been obtained.
3. Page 12 gives the time period for performing the ambient monitoring as being from June 12, 1981 to December 12, 1981, however the narrative states only four months of data had been obtained. Furthermore, short term monitoring (four months) during the summer months for TSP is acceptable, however EPA does require at least one year's worth of SO₂ monitoring prior to applying for a PSD permit. Four summer months and four winter months are critical periods for SO₂ ambient concentrations.

PAGE 2

If you have any questions concerning this matter, please contact Mr. Richard S. DuBose, Chief, Air Engineering Section at 404/881-7654.

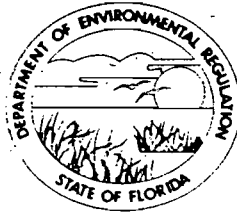
Sincerely yours,

A handwritten signature in cursive script, appearing to read "James T. Wilburn".

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

May 13, 1983

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
P. O. Box 919
Palatka, Florida 32077

RE: Federal PSD Permit No. PSD-FL-079

Dear Mr. Adams:

Three matters related to the processing of the federal PSD permit for the expansion of your Putnam County mill have arisen since we issued our Technical Evaluation and Preliminary Determination on January 18, 1983:

1. Comments (enclosed) have been received from EPA Region IV (Attachment 1).
2. A public hearing has been requested by the Florahome Chapter of the American Association of Retired Persons.
3. A concern for emissions of heavy metals (see those contained in Attachment 2), particularly mercury, from the drying and burning of peat has arisen on our part.

Each of these items will need to be resolved before we can forward a final determination to EPA Region IV.

On the question of heavy metals (see those contained in Attachment 2), our concern derives from the fact that in evaluating the water quality impacts of harvesting peat the department learned that such metals may accumulate in peat deposits. If you have not already done so, we would like you to analyze a representative set of samples of the peat you plan to use for its heavy metal content and estimate the potential emissions of these metals to the atmosphere. In the case of mercury, which is a regulated air pollutant, a BACT determination and air quality impact analysis will be required if emissions will equal or exceed 200 pounds per year.

As soon as the heavy metals question is resolved, the requested public hearing can be scheduled. Our permitting staff will be prepared to answer any questions the public may have on

No. 0157006

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO			
Mr. Vernon L. Adams			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE	\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$		
POSTMARK OR DATE			
5/16/83			

PS Form 3800, Apr. 1976

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered..... ¢

Show to whom, date and address of delivery..... ¢

RESTRICTED DELIVERY

 Show to whom and date delivered..... ¢

RESTRICTED DELIVERY.

 Show to whom, date, and address of delivery. \$ _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mr. Vernon L. Adams
Georgia-Pacific Corp.
P. O. Box 919
Palatka, FL 32077

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157006	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

DATE OF DELIVERY 5/17/83

POSTMARK PALATKA FL 17 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED

Mr. Vernon L. Adams
Page Two
May 13, 1983.

our preliminary determination. You will probably also want to have your technical staff available for the hearing.

Following the hearing, we will forward to EPA a final determination addressing the heavy metals question, any issues which arise at the hearing, and the comments received from EPA. You could assist us in responding to the EPA comments by providing us with the documentation asked for in comment number one of the enclosed letter.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/bm

cc: J. Wilburn, EPA Region IV
J. Ketteringham, NE District

ATTACHMENT 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 11 1983

REF: 4AW-AM

DER

FEB 17 1983

BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301 - 8241

RE: PSD-FL-079-Georgia-Pacific Corporation

Dear Mr. Fancy:

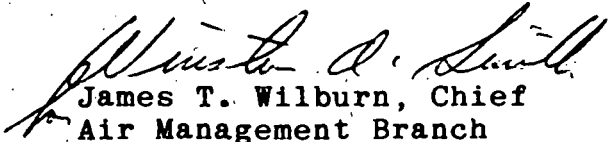
My staff has completed its review of your preliminary determination for Georgia-Pacific Corporation's proposed expansion of their existing kraft mill located in Palatka, Putnam County, Florida. Our comments are as follows:

1. So that our files may be complete, please submit sufficient documentation verifying the permanent shutdown of lime kilns 1-3 and recovery boilers 1-3.
2. The determination did not discuss why assumed background values (20 ug/m^3) were used in the NAAQS analysis instead of the ambient monitoring data that had been obtained.
3. Page 12 gives the time period for performing the ambient monitoring as being from June 12, 1981 to December 12, 1981, however the narrative states only four months of data had been obtained. Furthermore, short term monitoring (four months) during the summer months for TSP is acceptable, however EPA does require at least one year's worth of SO_2 monitoring prior to applying for a PSD permit. Four summer months and four winter months are critical periods for SO_2 ambient concentrations.

PAGE 2

If you have any questions concerning this matter, please contact Mr. Richard S. DuBose, Chief, Air Engineering Section at 404/881-7654.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "James T. Wilburn".

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

ATTACHMENT 2.

Table 8. Estimate of Average Water Quality from North Florida Peat Harvesting Runoff Prior to Treatment (Revised 7/8/82)

Parameter	Unit	Existing Background Average Cow Bay Water Quality	Estimated Untreated Harvesting Runoff Water Quality	FAC 17-3 Class III Standard
Dissolved Oxygen	mg/L	3.5	4.0	>5.0
pH	units	3.6	3.5 - 4.5	6.0 - 8.5
Color	units	377	400	N/A
BOD	mg/L	1.2	<5	NNS
Total Nitrogen	mg/L	1.63	2.5	NNS
Total Phosphorus	mg/L	0.02	0.1	NNS
Calcium	mg/L	2.4	3	N/A
Chromium	ug/L	<6	20	50.0
Magnesium	mg/L	0.9	1	N/A
Iron	mg/L	0.486	0.5	1.0
Beryllium	ug/L	<1	<1	11.0
Copper	ug/L	<6	<6	30.0
Lead	ug/L	28.5	<25	30.0
Nickel	ug/L	<12	<17	100.0
Mercury	ug/L	0.6	0.6	0.2
Selenium	ug/L	16.3	<17	25.0
Zinc	ug/L	23	75	30.0

Note: N/A = no standard.
NNS = no numerical standard.

Source: ESE, 1982.



BOB GRAHAM
GOVERNOR

STATE OF FLORIDA

Office of the Governor

THE CAPITOL
TALLAHASSEE 32301

March 17, 1983

DER

MAR 23 1983

BAQM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Preliminary Determination - Georgia-Pacific Corporation Federal
PSD-FL-079

SAI: FL8301240658

Dear Mr. Fancy:

The enclosed comments from the Departments of Community Affairs and Health and Rehabilitative Services on Georgia-Pacific's proposal to modify their existing facility in Palatka are enclosed for your information and use.

We appreciate the opportunity to receive and review those public notices.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ron Fahs".

Ron Fahs, Director
Intergovernmental Coordination

RF/mt
Enclosure

DEPARTMENT OF COMMUNITY AFFAIRS



BOB GRAHAM, GOVERNOR

OFFICE OF THE
SECRETARY

JOAN M. HEGGEN, SECRETARY

M E M O R A N D U M

TO : Ron Fahs, Director
Intergovernmental Coordination

FROM: John Burke, Assistant Secretary

SUBJ: FL 8301240658

DATE: February 10, 1983

Industrial and manufacturing development is a type of development subject to the requirements of Chapter 380.06, Florida Statutes. As Georgia-Pacific Corporation is modifying its existing facility to double production capacity, the company should look at the size of the total plant as it relates to Chapter 27F-2.05, Industrial Parks, Florida Administrative Code, and the character and location of the project. If the project after modification exceeds the threshold outlined in Chapter 27F-2.05, F.A.C., the project would be presumed to be a Development of Regional Impact (DRI) and the developer should contact the Northeast Florida Regional Planning Council regarding an application for development approval. If the presumptive threshold is not exceeded but the developer is in doubt about the DRI status due to the character or location of the project, a binding letter of interpretation should be requested from the Division of Local Resource Management.

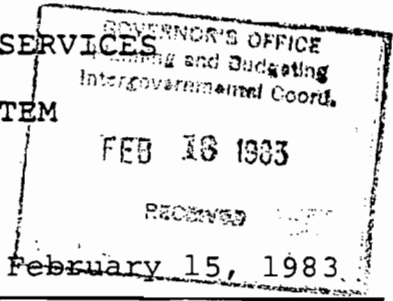
JB/GG/mu

STATE OF FLORIDA

DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

PROJECT NOTIFICATION AND REVIEW SYSTEM

RECOMMENDATION



Office of the Secretary

MEMORANDUM

SUBJECT: NOTIFICATION OF INTENT TO APPLY FOR FEDERAL FUNDS

TO: Chief, Bureau of Intergovernmental Relations, State Planning and Development Clearinghouse

FROM: Director, Office of Interprogram Policy Coordination and Development

Department of Health and Rehabilitative Services

BY: Rick Barth, Department Coordinator for PNRS

REF. NO. DHRS: _____ SPDC (SAI) _____ FL83-0124-0658

TITLE Preliminary Determination - Georgia-Pacific Corporation

APPLICANT Department of Environmental Regulation

The project is consistent with the goals and objectives of the Department of Health and Rehabilitative Services. Favorable action is recommended.

Substantive comments have been received and are summarized in the attached.

Additional Information; Full application;

Conference requested.

No comment.

The project is not consistent with the goals and objectives of the Department of Health and Rehabilitative Services. Approval is not recommended for reasons described in the attached comments.

DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

PROJECT NOTIFICATION AND REVIEW SYSTEM

REVIEWER COMMENT

Date: February 15, 1983

MEMORANDUM

TO: Rick Barth
PDPC, 488-2834

FROM: PNRS Unit Coordinator, Office of Heater

REF. NO. DHRS: _____ SPDC (SAI) _____ FL83-0124-0658

TITLE Preliminary Determination - Georgia-Pacific Corporation

APPLICANT Department of Environmental Regulation

This proposal identified above was reviewed by:

James L. Keys, Jr., Environmental Health Consultant	2/8/83
<u>Reviewer's Name and Title</u>	<u>Date Reviewed</u>

Reviewer's Comments: (Please type and use additional sheet if needed)

The Department of Environmental Regulation (DER) is authorized under Chapter 403, Florida Statutes, with the power and duty to control and prohibit pollution of air.

The Putnam County Health Unit does not have a local or contractual agreement with DER to provide technical or operational control services for air pollution control.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 11 1983

Auth - copy district
EST
Larry

Bruce - Question 1.

REF: 4AW-AM

DER

FEB 17 1983

BAQM

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301 - 8241

RE: PSD-FL-079-Georgia-Pacific Corporation

Dear Mr. Fancy:

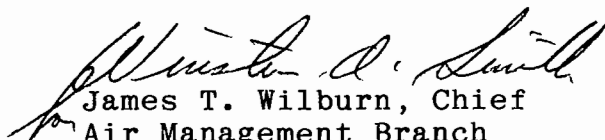
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PAGE 2

If you have any questions concerning this matter, please contact Mr. Richard S. DuBose, Chief, Air Engineering Section at 404/881-7654.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "James T. Wilburn".

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

Georgetown Fl, 32039
February 13, 1984

Bureau Air Quality Control
Palatka, Fl.

DER

FEB 17 1984

BAQM

To Whom It May Concern:

I am writing in reference to the air pollution in Putnam County.

I was born and reared in Georgetown, Florida. We moved away for a few years but returned to Georgetown in 1957.

Now I find the quality of the air deteriorating. also I see upper respiratory problems with many children and older people, which we didn't see before.

I have an upper respiratory problem which is aggravated by the polluted atmosphere. There are days I cannot even walk around my yard, or sit on my dock and fish because of the polluted air. I have to remain indoors with all the windows closed.

I think we need adequate monitors in different areas of the county to determine the source and prevent further deterioration of our air.

Sincerely,

(Mrs) Marjorie Benchoff

P. O. Box 146
Florahome, Florida 32635
March 14, 1984

DER
MAR 15 1984
BAQM

Mr. C. H. Fancy
Central Air Permitting Section
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

I have lived in my home for twenty-five years. The last five I have needed an air conditioner. Usually it is a necessity to sleep and breathe. You dare not leave a window open early in the morning, late afternoon, or night because of odors and various sprays. Often if you go outdoors after dark, your eyes and nose burn.

The following are reasons why I feel our air quality has deteriorated in Putnam County causing citizens to have lung problems and various diseases:

Expansion of Georgia Pacific - taller smokestacks spread pollution
2 coal fired plants - one in operation -

Various Florida Power & Light Plants (It is my understanding they have a lot of emergencies and burn No. 6 fuel oil)

Not sure

Large areas of forest burning and development clearing

Mosquito spraying by planes and trucks

Rivers sprayed for weed control using toxic chemicals

Farmers spraying fields by planes (drifts carried by wind)

Chemical plants that manufacture and store chemicals that have burned and exploded

People

Two JEA Coal plants under construction within 50 miles

Expansion without pollution control for jobs is a false economy. Acid rain and ill health far outweigh the cost for the individual taxpayer and government.

Mr. Adams said G. P. Emissions meet "National Standards" and perhaps each industry does. However, if they do, you should have standards raised if you are going to allow so many pollutants in one area.

For years Putnam County has issued tax exempt bonds for pollution control. I'd like you to monitor and enforce what regulations we have not industry.

Each incident keeps piling up and air quality can't help deteriorating. Individuals need to be responsible for their actions but controlling air quality is something an individual has to rely on E.P.A. to monitor and control.

We all have responsibilities and I feel corporations and business organizations are not assuming their share. The E.P.A. either doesn't have the tools to work with or isn't doing what the private citizens thought was the intent of the law.

I want to express my appreciation to you for the manner in which you conducted the recent public hearing. There was no ridicule and rudeness as sometimes happens in public hearings concerning environmental issues or concerns the average person may have.

The above opinions are my own. We need your help to improve and correct the deterioration of our air in Putnam County.

Sincerely,


Mary Webster

Enclosures

P. O. Box 148
Florahome, Florida 32635
March 14, 1984

DER

MAR 15 1984

BAQM

Mr. C. H. Fancy
Central Air Permitting Section
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

Over the past years the air quality has deteriorated in Putnam County. With the local industry's expansion and new industry moving here, I have noticed increased air pollution.

One of the areas of most concern to me is my children's school located on Horseman Club Road. The smoke plume completely covers the school and helps contribute to upper respiratory illness.

I recommend having an air monitoring system installed at that location and would appreciate your immediate action on this matter.

Sincerely,

Diane Smith

Diane Smith

CHAPTER 17-2

AIR POLLUTION

- 17-2.01 Declaration and Intent.
- 17-2.02 Definitions.
- 17-2.03 Best Available Control Technology.
- 17-2.04 Prevention of Significant Deterioration.
- 17-2.05 Prohibitive Acts.
- 17-2.06 Ambient Air Quality Standards.
- 17-2.07 Air Pollution Episode.
- 17-2.08 Sampling and Testing.
- 17-2.09 Local Regulations.
- 17-2.091 Public Comment.
- 17-2.10 Local Government.
- 17-2.11 Low Sulfur Fuel Shortage.
- 17-2.12 Source Test Method.
- 17-2.13 Nonattainment Areas for Particulate Matter.
- 17-2.14 Nonattainment Areas for Sulfur Dioxide.
- 17-2.15 Nonattainment Areas for Carbon Monoxide.
- 17-2.16 Nonattainment Areas and Emission Limits for Ozone.
- 17-2.17 New Source Review for Nonattainment Areas.
- 17-2.18 Emission Offsets.
- 17-2.19 Source Reclassification.
- 17-2.20 Intra-Facility Emission Banking.
- 17-2.21 Standards of Performance for New Stationary Sources.
- 17-2.22 Emission Standards for Hazardous Air Pollutants.
- 17-2.23 Stationary Point Source Emissions Test Procedures.
- 17-2.24 Severability.

DER

MAR 15 1984

BAQM

84
76PART I
DEFINITIONS

- 17-2.100 Definitions.

PART II
GENERAL PROVISIONS

- 17-2.200 Statement of Intent.
- 17-2.210 Permits Required.
- 17-2.220 Public Notice and Comment.
- 17-2.230 Operation and Maintenance Plans.
- 17-2.240 Circumvention.
- 17-2.250 Excess Emissions.
- 17-2.260 Air Quality Models.
- 17-2.270 Stack Height Policy.
- 17-2.280 Severability.
- 17-2.290 Effective Date.

*Mr Fancy, I am
not an attorney and can't
understand all of these.
Are any of these in force?
many water*

(copy from Public Library)

DER1982

AIR POLLUTION

frequently supplemented by fillers and toners.

(104) "New Source" - A source which is not in existence, for which an application for a permit to construct has not been submitted before the effective date of an applicable section or provision, or which has been reclassified as a new source pursuant to any provision of this Chapter.

Explain
(105) "New Source Allowance" - An emission allowance as provided in Sections 17-2.510(5) to accommodate the growth in emissions resulting from the operation of new or modified facilities in a nonattainment area.

(106) "Nitric Acid Plant" - Any facility producing weak nitric acid by employing either the pressure or atmospheric pressure process.

(107) "Nonattainment Area" - Any area not meeting ambient air quality standards and designated as a nonattainment area under Section 17-2.410 of this Chapter. Such an area may be designated as a particulate, sulfur dioxide, nitrogen dioxide, carbon monoxide or ozone nonattainment area, depending on which ambient standard has been violated. An area may be designated as nonattainment for more than one air pollutant.

(108) "Objectionable Odor" - Any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

(109) "Odor" - A sensation resulting from stimulation of the human olfactory organ.

(110) "Opacity" - A condition which renders material partially or wholly impervious to rays of light causing obstruction of observer's view.

(111) "Open Top Vapor Degreasing" - The batch process of cleaning and removing soils from metal surfaces by condensing hot solvent vapor on the colder metal parts.

(112) "Organic Compounds" - Any substance that contains the element carbon, except carbon oxides, and various carbonates.

(a) "Halogenated Organic Compound" - Any organic compound in which one or more hydrogen atoms have been replaced by a halogen atom(s).

(113) "Oven" - A chamber within which heat is used to bake, cure, polymerize, and/or dry a surface coating.

(114) "Overvarnish" - A coating applied directly over ink to reduce the coefficient of friction, to provide a gloss, and to protect the finish against abrasion and corrosion.

(115) "Owner" or "Operator" - Any person or entity who or which owns, leases, operates, controls, or supervises a stationary source.

(116) "Packaging Rotogravure Printing" - Rotogravure printing upon paper, paper board, metal foil, plastic film, and other substrates, which are, in subsequent operations, formed into packing products and labels for articles to be sold.

(117) "Paper Coating" - Coatings put on paper and pressure sensitive tapes regardless of substrate. Related web coating processes on plastic film and decorative coatings on metal foil are included in this definition.

control devices or systems deemed necessary and ordered by the Department.

(2) Objectionable Odor Prohibited - No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

Specific Authority: 403.061, F.S. Law Implemented: 403.021, 403.031, 403.061, 403.087, F.S. History: Formerly 17-2.04(4) and (5), 17-2.05(4) and (5); Revised 1-18-72; Renumbered 1-3-78; Amended and Renumbered 11-1-81.

17-2.630 Best Available Control Technology (BACT).

(a) Determination.

Following receipt of a complete application for a permit to construct a source or facility which requires a determination of Best Available Control Technology, the Department shall make a determination of Best Available Control Technology. In making the BACT determination, the Department shall give consideration to:

(a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants). The above references are available from the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C., and may be inspected at the Department's Tallahassee office. In no event shall application of BACT result in emissions of any pollutant which would exceed the emissions allowed under 40 CFR Parts 60 or 61.

Explain

(b) All scientific, engineering, and technical material and other information available to the Department.

(c) The emission limiting standards or BACT determinations of any other state.

(d) The social and economic impact of the application of such technology.

(2) Exceptions

(a) Any source which has received a written determination of Latest Reasonably Available Control Technology from the Department prior to the effective date of this Subsection shall be exempt from the requirements of Best Available Control Technology.

(b) Any pending petition or proceeding involving a determination of Latest Reasonably Available Control Technology (LRACT) in process on the effective date of this Subsection, and any construction permit application or construction permit proceeding relating to a category of sources encompassed by such proceeding shall be governed by the provisions of the LRACT rule, Chapter 17-2.02(30), and 17-2.03(1), Florida Administrative Code (Repealed).

(3) Phased Construction Projects - For phased construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time not later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the facility may be required to demonstrate the adequacy of any previous determination of BACT.

(4) Use of Innovative Control Technology

Why isn't this enforced?

P.O . Box 146
Florahome, Florida 32635
February 17, 1983

Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32301-8241

Atten: Mr. Larry George

Ladies and Gentlemen:

In 1982 our association requested monitors. In our opinion air quality was declining and unhealthy, apparently the letter was inadvertently sent to wrong address.

In 1983 our telegram referred to PSD-079, our understanding was there would be increased air pollutants (refer to 2-2-83 telegram)

As stated in our November 12, 1983 letter, our association did not place pollution problems on any specific industry.

We are not opposed to expansion of industry, however we think it paramount in the interest of present and future citizens that we have air monitors to prevent significant deterioration of air.

Sincerely,

Association of Retired Persons
Florahome Chapter

Mary Webster

Mary Webster
Environmental Committee Chairman

TIMOTHY KEYSER

ATTORNEY AT LAW

POST OFFICE BOX 92

INTERLACHEN, FLORIDA 32048

TELEPHONE (904) 684-4673

February 16, 1984

REGISTERED GENERAL PRACTICE
ENVIRONMENTAL AND LAND USE LAW

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

DER
FEB 20 1984
BAQM

Re: Proposed issuance of a federal PDS air construction permit to Georgia-Pacific Corporation

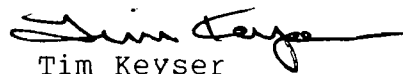
Ladies and Gentlemen:

Please accept my comment on the proposed issuance of a federal PDS air construction permit to Georgia-Pacific Corporation for boilers fired by peat.

I object to issuance of the permit and challenge past contentions of peat-mining proponents that peat will be a clean burning fuel.

My limited literature search reveals that studies are being conducted in Minnesota to determine the effects of peat burning on air quality but to date, no final conclusions have been published. I suggest that further analysis of pending studies be completed before consideration of this permit as prevention is of more benefit and more cost effective than treatment.

Sincerely,


Tim Keyser

TK/jm

PURPOSE HERE IS TO REQUEST A DENIAL OF THE PERMIT FOR GEOGIA-PACIFIC TO BURN PEAT AND BARK AS A FUEL. THE REASON IS THAT AS OF NOW WE REALLY HAVE NO HARD AND FACTUAL INFORMATION ON THE ^{LONG RANGE} BY-PRODUCTS OF THESE TWO MATERIALS ON THE ATMOSPHERE OR THE ENVIRONMENT.

* PEAT REPRESENTS THE FIRST STAGE IN THE DEVELOPEMENT OF COAL FROM VEGETABLE MATTER. SINCE IT CAN BE GENERALLY STATED THAT THE HARDER THE COAL THE MORE EFFICIENTLY IT BURNS AND THE LESS IT PRODUCES HARMFUL POLLUNTANTS SUCH AS SULPHER, IT STANDS TO REASON THAT PEAT MAY PRESENT PROBLEMS OF AN UNKNOWN NATURE. ACID RAIN AND ITS DISASTEROUS EFFECTS, FOR EXAMPLE, WERE NOT ANTICIPATED WHEN THE FAIRLY RECENT COAL-BURNING-BOOM STARTED AS AN ALTERNATE TO FOSSIL FUELS . PEAT AS A FUEL MAY ALSO BE EXPECTED TO HAVE UNEXPECTED INJURIOUS EFFECTS TO THE ENVIRONMENT.

* WOOD IS NOT AN EFFICIENT HEAT PRODUCER. IT WAS PROBEPLY THE FIRST FUEL USED BY ancient MAN, BUT WAS RAPIDLY REPLACED BY MORE EFFICIENT FUELS SUCH AS COAL, OIL, AND GAS. THE USE OF WOOD BARK THAT IS INFERIOR EVEN TO WOOD SHOULD BE CLOSELY MONITORED, AND COULD WELL BE SUSPECT IN THE POSSIBLE PRODUCTION OF UNANTICIPATED ILL EFFECTS TO THE ENVIRONMENT.

* SO * WHAT WE ARE IN EFFECT DEALING WITH IS REQUEST TO BURN ON AN INDUSTRIAL ^{SCALE} ~~LEVEL~~ 2 FUELS THAT WE REALLY KNOW LITTLE ABOUT AS REGARDS LONG RANGE EFFECTS ON THE ENVIRONMENT. I BELIEVE WE SHOULD PROCEED ON THE CONSERVATIVE SIDE UNTIL THESE EFFECTS ARE WELL DOCUMENTED AND WE CAN ACCURATELY PREDICT HOW THEY WILL REACT WITH THE ENVIRONMENT.

* VALID DOCUMENTATION INDICATES THAT WE IN THE S.E. ARE BEING DRASTICALLY AFFECTED BY POLLUTION FROM COAL-BURNING POWER PLANTS IN THE UP-WIND N.E. STATES. JACKSONVILLE, FLA, FOR EXAMPLE, HAS THE HIGHEST RATE OF LUNG CANCER IN THE ENTIRE COUNTRY, AND THIS IS ATTRIBUTED MOSTLY TO THE AIR-BORNE POLLUTANTS FROM OUT OF STATE THAT CONVERGE ON THAT AREA. THE QUESTION IS: DO WE WANT TO BRING THESE SAME RISKS INTO OUR OWN BACK-YARDS TO THE DETRIMENTAL EFFECT OF NOT ONLY THE IMMEDIATE AREA, BUT TO THE REST OF THE STATE TO THE SOUTH?

* IN SHORT, MY POSITION IS THAT UNTIL WE KNOW FOR A FACT THE LONG RANGE ENVIRONMENTAL AND PUBLIC HEALTH EFFECTS OF THE BURNING OF BOTH PEAT AND BARK YOUR RESPONSIBILITY IS TO THE PUBLIC WELFARE INSTEAD OF INDUSTRIAL WELFARE.

* WE ALL KNOW THAT GEORGIA-PACIFIC CONTRIBUTES MUCH TO THE ECONOMY OF ~~BOTH~~ THE STATE AND LOCAL GOVERNMENTS THROUGH EMPLOYMENT AND TAXES, BUT THESE BENEFITS ARE EXTREMELY SMALL WHEN COMPARED TO THE POSSIBLE DETRIMENTAL ~~EFFECTS ON~~ ^{of} THE ENVIRONMENT BY USE OF EXPERIMENTAL FUELS. GEORGIA-PACIFIC CERTAINLY HAS THE PUBLIC INTEREST AT HEART, BUT, BEING A PROFIT ORIENTED CORPORATION IT IS ENTIRELY POSSIBLE THAT PUBLIC INTEREST COULD BE OVER-RIDDEN BY PROFIT INTEREST.

* I URGE YOU TO REJECT THIS PERMIT UNTIL FURTHER FACTS ARE KNOWN, OR IF YOU CANNOT DO THAT, TO AT LEAST CONDUCT EXTENSIVE MONITORING OF THE EFFECTS OF THIS EXPERIMENT UNTIL ALL THE FACTS, BOTH GOOD AND BAD, ARE KNOWN AND CAN BE ACCURATELY PREDICTED. TO ALLOW G-P TO DO ITS OWN MONITORING IS LIKE ALLOWING A POLITICIAN TO SET HIS OWN SALARY.

VALID DATA

INDEPENDENT STUDIES

Monitoring - NO LONG RANGE (10, 20-100 mi)

EXPERIENCE - PERM/BACK?

GOETTLER - DR. GOOD ABOUT STANDARDS OF
AIR QUALITY. WHY SO MANY
PERSONS DETRIMENTALLY AFFECTED BY ^{ANYTHING} FROM
RESPIRATORY DISTRESS TO ~~DEATH~~? [?] LEAD
CANCER TO DYING.

Feb-15-84
DER

FEB 17 1984

To Whom it may Concern.

In regards to having the ^{BQM} monitor. I would like to make a request to have the air monitor, in our area of Ft. Lauderdale & also the neighboring areas around us. I do believe that this is more than necessary. We do have many people living here that has respiratory problems, plus allergies, asthma & many of them have heart trouble. I have seen several of my neighbors with these problems, have to spend many a day in doors on real nice days & all due to the orders & pollution in the air.

I for one would appreciate it & so would they, if you would take this into consideration & do all that you possible could do to help this situation.

I am Cecelia G. Fitchins. I moved here from New Jersey & when we moved here we chose this area because of its better breathing air. We moved here in 1977. Now since that time things have changed quite a bit and really not for the better.

Please do give this matter some thought.

Thanking you in Advance

I remain
Cecelia G. Fitchins
P.O. Box 74

Ft. Lauderdale - Fla. 32635
Corner of Ivory & Michigan Ave. - Ft. Lauderdale -

DER

MAR 15 1984

BAQM

C. H. Fency P.E.
Deputy Bureau Chief
Bureau of Air Quality Management

Dear Sir;

In regards to the quality of the air in & around Putnam County. When I lived in Votlaka, there were many days I could not go outside for the smell in the air until late in the day.

I now live fifteen miles out, in Glorabone. There are times when I have to stay inside because of the air quality here.

Days when I have to go into town, just a little ways down the road, it is so bad, (the air) you couldn't stand it without air conditioning in your car. It even seeps through the car. I have a breathing problem which is very bad, as I'm sure many others have. We do need clean air, by all means.

Thank you for listening,
A concerned citizen

Mrs. Ruby Fogle
Glorabone Fla

over)

By the way,
when we moved here six
years ago - the air was more
pure - But has gradually gotten
worse.

Am all for pure + fresher
air -

Thank you -

Philip Fogel -

TO: Georgia-Pacific Corporation File

FROM: Bruce Mitchell

DATE: March 16, 1984

SUBJ: Comments on PSD-FK-D/19

1. There should be provisions covering the operation and maintenance of the control equipment systems.

DER

MAR 16 1984

BAQM

BEST AVAILABLE COPY

AMERICAN ASSOCIATION OF
RETIRED PERSONS
FLORAHOME CHAPTER NO. 3429
P. O. BOX 357
FLORAHOME, FLORIDA 32535

RECEIVED

FEB 4 1983

Mrs. Martha Warrell
Office of General Counsel
Florida Dept. of Environmental Regulation
2500 Plairstone Rd.
Tallahassee, Florida 22301

Dept. of Environmental Regulation
Office of General Counsel

Re: PSD-FL-070
Public Notice dated Jan. 21st, 1983

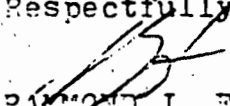
Dear Mrs. Warrell:

We are writing to you, relative to the above. As we understand that there is new industry moving into our area, and with new industry comes air pollution.

We enjoy the fresh clean air in Putnam County and we would like to keep it that way.

Therefore, we request that the area be monitored by your staff, in the pertinent areas of the county, to maintain control of our pure air.

Respectfully yours,


RAYMOND J. RICHTORN
President
Florahome Chapter AARP

January 31, 1983



Telegram

THA052(1427)(4-027744S033)PD 02/02/83 1426

ICS IPMTZZ CSP

9043254217 IDMT PALATKA FL 27 02-02 0226P EST

FMS STEVEN SMALLWOOD OR MRS MARTHA HARRELL HALL, DLR

OFFICE OF GENERAL COUNCIL FLORIDA DEPT OF ENVIRONMENTAL RELATIONS
2600 BLAIRSTONE RD

TALLAHASSEE FL 22301

REFERENCE TO PSD-FL-079. REQUEST PUBLIC HEARING PURSUANT TO FS 120-57
BECAUSE OF DECLINING AND UNHEALTHY AIR. PLEASE CONSIDER YOU
MONITORING. REFER TO ARP'S PRESIDENT'S LETTER.

THANK YOU

MARY P WEBSTER DIANE SMITH

PO BOX 148

FLORAHOME FL 32635

NNNN

RECEIVED

FEB 2 1983

Dept. of Environmental Regulation
Office of General Counsel

Rec'd 2/4/83 11:07 AM
RFR

STATE CLEARINGHOUSE
Intergovernmental Coordination
Office of the Governor
The Capitol Building
Tallahassee, Florida 32301
(904) 488-8114

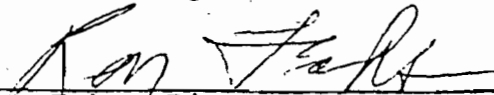
SAI Number: FL8301240658
Date Received: 1/24/83

We have received your recent correspondence concerning the project identified by your title Preliminary Determination Georgia-Pacific Corporation Federal PSD-FL-079

This review begins on the day the subject item was received in our office, pursuant to U. S. OMB Circular A-95 and/or Section 216.212 Florida Statutes. Please refer to the above State Application Identifier (SAI) Number in future correspondence concerning the project. The State Application Identifier must be inserted in item 3b of Federal Form 424. Completion of item 3b and attachment of our final letter of comments will complete your application for submission to the appropriate federal agency.

The target date for completion of our review and dispatch of comments is this date plus 30 days. Completion of action may be delayed if we need to review additional information, in which case you will be notified.

Please insure that copies of your application have been sent to the appropriate Regional and Metropolitan Clearinghouses.


Ron Fahs, Director
Intergovernmental Coordination

PUBLIC NOTICE

PSD-FL-079

Georgia-Pacific Corporation proposes to modify its existing kraft pulp mill located in Palatka, Florida. The modification will double production to 2,400 tons per day of unbleached pulp. The new facilities to be constructed include a recovery boiler and associated smelt tanks (2), a lime kiln, and a combination boiler fired by bark and peat. Each new facility will have associated pollution control equipment installed.

The United States Environmental Protection Agency (EPA) has promulgated regulations concerning the Prevention of Significant Deterioration (PSD), 40 CFR 52.21. The proposed action is subject to federal PSD regulations by virtue of an increase over specified emission levels for sulfur dioxide (SO2), nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC).

The net projected emission increase of air pollutants from the affected facilities in tons per year will be:

SO2	NOx	CO	VOC
3.567	1.728	1.975	511

By authority of the EPA, the Florida Department of Environmental Regulation (FDER) has reviewed the proposed construction project under federal regulation 40 CFR 52.21, PSD. The FDER has made a preliminary determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a PSD permit submitted by Georgia-Pacific Corporation are available for public review at the following places:

FDER
Northeast District
3426 Billis Road
Jacksonville, Florida 32207

FDER
Northeast District Branch Office
825 N. W. 23rd Ave., Suite G
Gainesville, Florida 32601

FDER
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Palatka Public Library
216 Reid Street
Palatka, Florida 32077

The maximum percentage of allowable PSD increment consumed by the proposed project will be:

Class II Increment

Pollutant	Annual	24-Hour	3-Hour
PM	0	0	0
SO2	30	16	19

Any person may submit written comments to FDER regarding the proposed construction/modification. All comments postmarked not later than 30 days from the date of this notice will be considered by FDER in making a final determination regarding approval of this project. These comments will be made available for public review at the above locations. All comments should be addressed to:

Mr. C. H. Fancy
Central Air Permitting Section
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Furthermore, a public hearing can be requested by any person. Such requests should be submitted in writing within 14 days of the date of this notice. Letters should be addressed to:

Ms. Martha Harrrell Hall
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee Florida 32301
Jan. 21, 1983 13897

STATE OF FLORIDA }
County of Putnam } ss:

Personally appeared before me, a Notary Public for the State of Florida at Large, Joyce Guthrie who deposes and says that he is Business Office Manager of The Palatka Daily News, a daily newspaper printed in the English Language and of general circulation, published in the City of Palatka, in said County and State; and that the attached order, notice, publication and/or advertisement of Public Notice:

Georgia-Pacific Corporation proposes to modify its existing kraft pulp mill located in Palatka, Florida.

was published in said newspaper Palatka Daily News for a period of One Insertion consecutively, Beginning January 21, 1983 and ending January 21, 1983 said publication being made on the following dates:

January 21, 1983

And deponent further says that The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class mail matter at the postoffice at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, publication and/or advertisement.

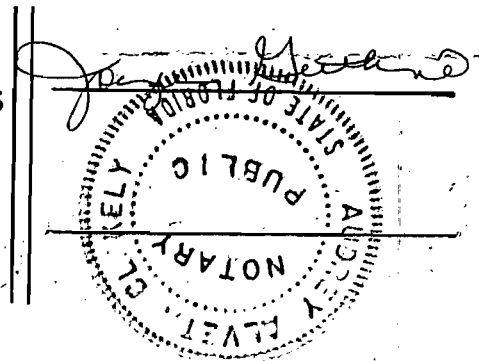
Subscribed and sworn to before me this

25 day of January A. D. 1983

Dudrey Alberta Blakely

Notary Public, State of Florida
My Commission Expires Oct. 23, 1984
Bonded thru Troy Fein - Insurance, Inc.


No. 13897



INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Permit File PSD-FL-072

THRU: Clair Fancy
Bill Thomas
Larry George 

FROM: Bruce Mitchell

DATE: August 28, 1981

SUBJECT: Preliminary Rule Applicability - Georgia-Pacific Inc.,
Putnam County

An application for a federal prevention of significant deterioration (PSD) permit was submitted to the Bureau of Air Quality Management on June 2, 1981, by Georgia-Pacific, Inc. (G-P). The application was ruled substantially complete as of that date.

The proposed project consists of a plant expansion at G-P's kraft pulp mill in Putnam County near Palatka which will double production to 2,400 tons per day of unbleached pulp. The expansion will include five new sources of air pollution: a recovery boiler and two associated smelt tanks, a lime kiln, and a combination boiler fired by bark and peat.

The G-P mill is in an area designated attainment under 40 CFR 81.310 for all criteria pollutants. It is more than 100 km from any Class I area.

Recovery boilers 1-3 and associated smelt tanks at G-P's Palatka mill were permanently shut down in March, 1977. Under federal PSD regulations (40 CFR 52.21), the reductions in actual emissions resulting from these shut-downs are considered to be contemporaneous with the proposed project and otherwise creditable. No contemporaneous increases in actual emissions other than the emissions associated with the proposed project itself have been identified by the applicant. The projected net emissions increases and applicable significant emission rates for the proposed project are listed in the following table.

<u>Regulated Pollutant</u>	<u>Applicant's Projected Emission Rate (tons/year)</u>	<u>Contemporaneous Emissions Reduction (tons/year)</u>	<u>Net Emissions Increase (tons/year)</u>	<u>Significant Emission Rate (tons/year)</u>
Particulate Matter (PM)	1,441	1,251	190	25
SO ₂	3,341	805	2,536	40
NO _x	1,765	480	1,285	40
VOC	591	80	411	40
CO	6,855	4,880	1,975	100
Total Reduced Sulfur (TRS)	32	2,120	-2,088	10

Since the proposed project is a physical change to an existing major stationary source which would result in a significant net emissions increase of at least one regulated pollutant, it constitutes a major modification subject to review under federal PSD regulations (40 CFR 52.21(i)). PSD review consists of a determination of best available control technology (BACT) and an air quality impact analysis for each attainment pollutant that would be emitted in a significant net amount. For the proposed project PSD review is required for five pollutants: PM, SO₂, NO_x, VOC, and CO.

The proposed project is also subject to PM and TRS emission limiting standards for the recovery boiler, smelt tanks, and lime kiln and a visible emissions (VE) standard for the recovery boiler under the federal new source performance standards (NSPS) for kraft pulp mills (40 CFR 60.280, Subpart BB). The combination boiler is subject to a VE standard and emission limiting standards for PM, SO₂, and NO_x under the NSPS for fossil fuel steam generators (40 CFR 60.40, Subpart D). The BACT determinations for these units and pollutants must be at least as stringent as the applicable NSPS.

Permit File PSD-FL-072
Page Two
August 28, 1981

APPROVED:

Larry George 9/3/81
Larry George DATE

Bill Thomas 9/18/81
Bill Thomas DATE

Clair Fancy 9/21/81
Clair Fancy DATE

BM: jr

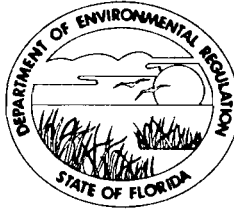
cc: J. Ketteringham

STATE OF FLORIDA

File copy

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

December 30, 1983

Ms. Doris Cubley
c/o St. John's River Water
Management District
Post Office Box 1429
Palatka, Florida 32078

Re: Federal Public Hearing: February 10, 1984

Dear Ms. Cubley:

This letter is to confirm our request to hold a federal public hearing at the St. John's River Water Management District on February 10, 1984, at 10:00 AM. The bureau will announce the hearing in the Florida Administrative Weekly and the local paper in Palatka.

Thank you for allowing the hearing to be held in one of your conference rooms. If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

C.H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality Management

CHF:BM:ht

cc: Nancy Wright

P. O. Box 146
Florahome, Florida 32635
November 28, 1983

Mr. C. H. Fancy, P. E.
Deputy Bureau Chief
Bureau of Air Quality
Management
Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
DEC 13 1983
BAQM

Dear Mr. Fancy:


Thank you for your letter of November 4, 1983. At the last meeting of the AARP, our decision was to send your letter to Committee for further analysis. We do not have the professionals necessary to fully understand the technical data in your letter.

Our next AARP Meeting will be the latter part of January at which time the Committee's Report will determine if we need to have a federal hearing.

Please be assured that we have not placed pollution problems on any specific industry but are concerned with monitoring air pollution in our county.

We will advise you of our decision concerning the hearing after our January meeting.

Sincerely,


Mary P. Webster
Environmental Chairman
Florahome AARP

Mike:
Should I copy
anyone else?

(i)

1 Feb. 1988
Palatka, FL

Georgia-Pacific Corporation Palatka Operations
Southern Pulp & Paper Division
P.O. Box 919
Palatka, Florida 32078-0919
Telephone (904) 325-2001

January 28, 1988

DER

FEB 2

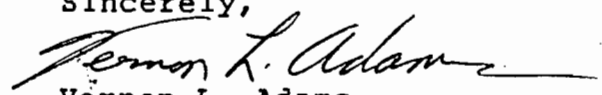
BAQM

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Bruce;

Please find enclosed a copy of the letter we received which extended the expiration dates for permits AC 54-43773, AC 54-43791, and AC 54-43795. If you need additional information please call me.

Sincerely,



Vernon L. Adams
Supervisor of
Environmental Affairs

cc: W. L. Baxter

Copied: Mike Naley }
CHF/BT } 22.88 (m)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

November 21, 1985

cc: W.L. Baxter
W.R. Wilson
E. Schmidt
Air File
Air Permit File

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
Post Office Box 919
Palatka, Florida 32077

DER

FEB 2

BAQM

Dear Mr. Adams:

Re: Extension of the Expiration Date for AC 54-43773,
AC 54-43791 and AC 54-43795

The bureau is in receipt of your request to extend the expiration date of the above referenced construction permits issued November 2, 1981, and are to expire December 31, 1985. The request is acceptable and the following condition is changed:

Expiration Date:

From: December 31, 1985
To: July 31, 1989

Attachment to be incorporated is:

° AC 54-43773

10. Mr. Vernon L. Adams' letter dated November 12, 1985.

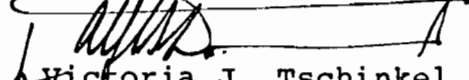
° AC 54-43791 and AC 54-43795

9. Mr. Vernon L. Adams' letter dated November 12, 1985.

November 21, 1985
Page Two

This letter and attachment shall be attached to each of your construction permits, No. AC 54-43773, -43791 and -43795, and shall become a part of that permit.

Sincerely,



Victoria J. Tschinkel
Secretary

VJT/p

cc: W. R. Wilson
Johnny Cole

Georgia-Pacific Corporation

Hudson Pulper Corp.
A wholly-owned subsidiary

P.O. Box 919
Palatka, Florida 32977
Telephone (904) 325-2001

November 12, 1985

Mr. Clair Fancy
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

DER

FEB 2

BAQM

Dear Clair:

Georgia-Pacific hereby requests an extension of construction permits, numbers AC 54-43773, AC 54-43791 and AC 54-43795, all of which expire on December 31, 1985. These permits are for the construction of a new lime kiln, recovery boiler and combination boiler. The receipt of our PSD permit from EPA in December of 1984, combined with a subsequent appeal of this permit which was resolved in October of 1985, has made it impossible to construct these sources prior to the expiration date of our current Florida permits. It is for these reasons that we respectfully request an extension of these permits until July 31, 1989. This period is requested in order to allow time to begin construction, complete construction and complete the compliance testing of these units.

If you have any questions, please contact me at (904) 325-2001.

Sincerely,



Vernon L. Adams
Supervisor of Environmental Affairs

/de

cc: W. L. Baxter-Palatka
J. Cole - FDER-Jax
W. R. Wilson-Palatka
D. Hodges - Atlanta 11
E. Schmidt- Atlanta 09

DER

NOV 13 1985

BAQM

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional	Reply Required	Info. Only
Date Due: _____	Date Due: _____	

BT
TO: John C. Brown, Jr., Northeast District office
FROM: Bill Thomas, Bureau of Air Quality Management
DATE: March 7, 1985 *BT*
SUBJ: Application Packages to install ESP's on No. 4
Combination Boiler and No. 5 Power Boiler at
Georgia-Pacific Corporation

On February 28, 1985, the bureau received the above referenced application packages. Since each of the referenced sources was not permitted via a construction permit, their requests would not be considered a modification, pursuant to FAC Rule 17-2.100(105), which is also attached. Therefore, the bureau is transmitting the application packages to the district office for processing as a revision to their existing operating permits.

A fee per source should be appropriate. The applicant is awaiting a response from the department on fees and any additional information that might be necessary for processing their requests.

If there are any questions, please call me or Bruce Mitchell at SunCom 278-1344.

BT/BM/rw

Attachments

BACT/LAER Clearinghouse
 U.S. EPA (MD-15)
 RTP, NC 27711

BACT/LAER DETERMINATION REPORT

WOOD PRODUCTS
 Source Category
 February 10, 1986
 Date of This Report

Source Type/Size: Kraft Pulp Mill: existing-1200 TPD unbleached pulp; proposed-2400 TPD unbleached pulp

Company Name/Site Location: Georgia-Pacific Corporation; Palatka, Florida

Determination is: BACT/LAER For New/Modified Source: Date of Permit Issuance: Dec. 4, 1984; revised-Oct.10, 1985
 (circle appropriate effective-Nov.15, 1985.)
 definition) Permit No.: PSD-FL-079 Date of Estimated Start-up: BACT expires May 15, 1987

Prepared by: FL Dept of Environmental Regulation Bruce Mitchell (904) 488-1344
 (Agency) (Person Directly Knowledgeable About Permit) (Phone)

Permit Parameters: (List all processes subject to this permit)	Throughput capacity, weight rate, Btu input, etc.	Pollutant(s) emitted (SO ₂ , particulate, etc.)	BACT/LAER emission limit(s) and basis for the limits* (units of emissions/units of input)	Control equipment or process modification description**	Eff. %
5 Recovery Boiler	max.: 607,500 lb/hr	VE	max.: 20% opacity-BACT	ESP	
	steam @ 900F; 230,679 lb/hr	PM	0.044 gr/DSCF, cor. to	ESP	99%*
	black liquor @ 65% solids (50 TPH		8% O ₂ (75.40 lb/hr, 330 TPY) - NSPS		
	ADUP; 150,000 lb/hr dry BLS); 990x10 ⁶	SO ₂	150 ppmv dry (244 lb/hr, 1287 TPY) - NSPS	none	
	BTU/hr HI and yielding 63,000				
	lb/hr smelt.	TRS	5 ppmv dry, cor. to 8% O ₂ (5.2 lb/hr, 22.8 TPY) - NSPS	none	

Notes***: After canvassing many of the pulp mills in Florida, it was found that existing RB's are and have been achieving VE's of 20% opacity or less on a continuous basis. Also, a field trip to the referenced mill revealed that reasonable VE's (20% opacity range) can be expected even without 1/2 of an ESP (USEPA Region IV @ Georgia-Pacific on 5/8/85).

*Indicate basis of emissions limit, i.e., BACT determined simply by technology and economics, NSPS, LAER, or determined by NAAQS or PSD increment constraints. (Example: 0.05 pounds particulate per million Btu input limit needed to protect Class I increment.) To promote consistency, please use NSPS emission limits where possible.
 **To the extent possible in the space available, describe basic control or process equipment design details. Indicate unique or innovative features.
 ***Notes are optional and can address special items, unusual circumstances, or other clarifying information such as SIC codes.

BACT/LAER Clearinghouse
 U.S. EPA (MD-15)
 RTP, NC 27711

BACT/LAER DETERMINATION REPORT

WOOD PRODUCTS
 Source Category
 February 10, 1986
 Date of This Report

Source Type/Size: Kraft Pulp Mill: existing-1200 TPD unbleached pulp; proposed-2400 TPD unbleached pulp

Company Name/Site Location: Georgia-Pacific Corporation; Palatka, Florida

Determination is: BACT/LAER For New/Modified Source: Date of Permit Issuance: Dec. 4, 1984; revised-Oct.10, 1985
 (circle appropriate effective-Nov.15, 1985.
 definition) Permit No.: PSD-FL-079 Date of Estimated Start-up: BACT expires May 15, 1987

Determination Made By: FL Dept of Environmental Regulation Bruce Mitchell (904) 488-1344
 (Agency) (Person Directly Knowledgeable About Permit) (Phone)

Parameters: (subject permit)	Throughput capacity, weight rate, Btu input, etc.	Pollutant(s) emitted (SO ₂ particulate, etc.)	BACT/LAER emission limit(s) and basis for the limits* (units of emissions/units of input)	Control equipment or process modification description**	Eff. %
No. 5 RB cont.		NO _x , CO, VOC	none	proper equipment operation	
No. 5 Smelt Tanks x 2	max.: 63,000 lb/hr smelt (total)	PM	max.: 0.20 lb/ton BLS, dry weight (15.0 lb/hr, 65.7 TPY-total)-NSPS	Wet Scrubbers x 2	98%
		TRS	0.0168 lb/ton liquor solids, dry weight (1.3 lb/hr, 5.5 TPY-total) - NSPS	none	

Notes***: _____

*Indicate basis of emissions limit, i.e., BACT determined simply by technology and economics, NSPS, LAER, or determined by NAAQS or PSD increment constraints. (Example: 0.05 pounds particulate per million Btu input limit needed to protect Class I increment.) To promote consistency, please use NSPS emission limits where possible.

**To the extent possible in the space available, describe basic control or process equipment design details. Indicate unique or innovative features.

***Notes are optional and can address special items, unusual circumstances, or other clarifying information such as SIC codes.

BACT/LAER Clearinghouse
 U.S. EPA (MD-15)
 RTP, NC 27711

WOOD PRODUCTS
 Source Category
 February 10, 1986
 Date of This Report

BACT/LAER DETERMINATION REPORT

Source Type/Size: Kraft Pulp Mill: existing-1200 TPD unbleached pulp; proposed-2400 TPD unbleached pulp

Company Name/Site Location: Georgia-Pacific Corporation; Palatka, Florida

Determination is: BACT/LAER For New/Modified Source: Date of Permit Issuance: Dec. 4, 1984; revised-Oct.10, 1985
 (circle appropriate effective-Nov.15, 1985.)
 definition) Permit No.: PSD-FL-079 Date of Estimated Start-up: BACT expires May 15, 1987

Determination Made By: FL Dept of Environmental Regulation Bruce Mitchell (904) 488-1344
 (Agency) (Person Directly Knowledgeable About Permit) (Phone)

<u>Process Parameters:</u> List all processes subject to this permit)	<u>Throughput</u> capacity, weight rate, Btu input, etc.	<u>Pollutant(s)</u> emitted (SO ₂ particulate, etc.)	<u>BACT/LAER</u> emission limit(s) and basis for the limits* (units of emissions/ units of input)	<u>Control equipment</u> or process modification description**	<u>Eff. %</u>
No. 5 Lime Kiln	max.: 63,299 lb/hr lime	VE	max.: 20% opacity - BACT	Wet Scrubber	
	mud; 26,667 lb/hr product rate of	PM	0.13 gr/DSCF, cor. to	Wet Scrubber	99.7%
	90% CaO		10% O ₂ (29.3 lb/hr, 128 TPY) - NSPS		
		TRS	8 ppmv dry, cor. to	none	
			10% O ₂ (1.1 lb/hr, 4.8 TPY) - NSPS		
No. 5 Combination Boiler	max.: 700,000 lb/hr	VE	max.: 20% opacity except for one	ESP	

Notes***: For the No. 5 Combination Boiler, the permittee accepted the NSPS limits of 40 CFR 60, Subpart D, steam @ 900F; cont. 6 min. period/hr @ 27% opacity-BACT and the Department did not classify peat as a fossil fuel.

*Indicate basis of emissions limit, i.e., BACT determined simply by technology and economics, NSPS, LAER, or determined by NAAQS or PSD increment constraints. (Example: 0.05 pounds particulate per million Btu input limit needed to protect Class I increment.) To promote consistency, please use NSPS emission limits where possible.
 **To the extent possible in the space available, describe basic control or process equipment design details. Indicate unique or innovative features.
 ***Notes are optional and can address special items, unusual circumstances, or other clarifying information such as SIC codes.

BACT/LAER Clearinghouse
 U.S. EPA (MD-15)
 RTP, NC 27711

BACT/LAER DETERMINATION REPORT

WOOD PRODUCTS
 Source Category
 February 10, 1986
 Date of This Report

Source Type/Size: Kraft Pulp Mill: existing-1200 TPD unbleached pulp; proposed-2400 TPD unbleached pulp

Company Name/Site Location: Georgia-Pacific Corporation; Palatka, Florida

Determination is: BACT/LAER For New/Modified Source: Date of Permit Issuance: Dec. 4, 1984; revised-Oct.10, 1985
 effective-Nov.15, 1985.
 Permit No.: PSD-FL-079 Date of Estimated Start-up: BACT expires May 15, 1987

Approval Made By: FL Dept of Environmental Regulation Bruce Mitchell (904) 488-1344
 (Agency) (Person Directly Knowledgeable About Permit) (Phone)

Unit Parameters: List all processes subject to this permit	Throughput capacity, weight rate, Btu input, etc.	Pollutant(s) emitted (SO ₂ particulate, etc.)	BACT/LAER emission limit(s) and basis for the limits* (units of emissions/units of input)	Control equipment or process modification description**	Eff. %
No. 5 Combination Boiler cont.	Bark-254,965 lb/hr & 1083.6x10 ⁶ BTU/hr HI;	PM	0.10 lb/10 ⁶ BTU HI (108 lb/hr, 475 TPY-bark, worst case) BACT	ESP	99%
	No. 6 FO-40,0 bbl/hr & 250x10 ⁶ BTU/hr HI @ 2.5% S.	SO ₂	0.65 lb/10 ⁶ BTU HI (704 lb/hr-bark & 654 lb/hr-peat) BACT	S analysis of the FO	
	Peat-217,869 lb/hr & 1005.7x10 ⁶ BTU/hr HI;	NO _x	0.3 lb/10 ⁶ BTU HI (325 lb/hr-bark & 302 lb/hr-peat) BACT	proper equipment operation	
		CO & VOC	none	proper equipment operation	

Notes***:

*Indicate basis of emissions limit, i.e., BACT determined simply by technology and economics, NSPS, LAER, or determined by NAAQS or PSD increment constraints. (Example: 0.05 pounds particulate per million Btu input limit needed to protect Class I increment.) To promote consistency, please use NSPS emission limits where possible.
 **To the extent possible in the space available, describe basic control or process equipment design details. Indicate unique or innovative features.
 ***Notes are optional and can address special items, unusual circumstances, or other clarifying information such as SIC codes.

5-16-85

R. Bruce Mitchell

09:00-

Georgia-Pacific Corp. - Palatka, Putnam Co.

Pictures:

11:22 1/2

11:23

11:43 1/2

A. Attendees

Wayne Aronson - EPA Region IV

Bill Voshell - EPA Region IV

Mert Benjamin - FDER

Eric Schmidt - G.P. Atlanta

Bob Wilson - Environmental Mgr.

Vernon Adams - Environmental Eng. Section

Honnie Yarborough - RB Supervisor

B. Scope:

RB - ESP completely on - VE's

RB - 1/2 ESP down - VE's

RB - maintenance log

RB ESP - maintenance log

RB ESP - Opacity monitor logs/charts

RB ESP - available spare parts

RB ESP - purchasing log of parts (Ed Brown - PIC)

RB ESP - TR meter readings, voltages, currents, raper cycle
shift to shift basis logging

RB parameters - ESP totally on

1/2 ESP off

200 vibrators, 5 run simultaneously where-ever,

Annual Outage - November, 1984

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Clair Fancy

FROM: Bruce Mitchell *BM*

DATE: April 30, 1985

SUBJ: Georgia-Pacific Corporation
PSD-FL-079

If any malfunction of the air pollution control system (APCS) occurs such that there is an upset and the visible emissions limiting standard of 20% opacity is to be exceeded up to 35% opacity, the permittee shall immediately diagnose the cause of the malfunction and establish the course of action to repair the APCS. Repair of the APCS shall commence immediately, unless a component has to be ordered from a vendor. The permittee shall be required to maintain a stock of components of the APCS that have a history of going defective or malfunctioning on a regular basis.

The following shall be, but not limited to, required as a course of action to repair the APCS during a malfunction or upset: assessment of the availability of the defective component(s) and the purchase/delivery time involved in days; assessment of the time required to repair the APCS in man-hours; and, a commitment to the regulatory agency or its designee on the completion date for repairing the APCS. In all cases of upset or malfunction of the APCS, the permittee shall give the same priority to maintain the operation of the APCS that would and is given to the operation of the production equipment.

BM/rw



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 09 1985

REGION IV

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

345 COURTLAND STREET
ATLANTA, GEORGIA 30355

DER
DEC 23 1985
BAQM

REF: 4APT-AP

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32077

RE: PSD-FL-079, Georgia-Pacific Corporation

Dear Mr. Adams:

This is to notify you that the effective date of the federal Prevention of Significant Deterioration (PSD) construction permit, PSD-FL-079, issued on December 4, 1984, and the subsequent modifications made to the permit by letter dated October 10, 1985, became effective on November 15, 1985. This effective date was determined in accordance with our letter of modification as 30 days from the date of receipt, provided no petitions were filed. As no petitions were received, a Federal Register notice announcing the permit modifications and effective date was forwarded for publication.

Please be advised if construction does not commence within 18 months after November 15, 1985 (by May 15, 1987), or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

If you have any questions regarding this letter, please contact Mr. Michael Brandon of my staff at 404/881-4901.

Sincerely yours,

Bruce Miller

Bruce Miller
Acting Chief, Air Programs Branch

cc: Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OCT 10 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REF: 4APT-AP

Mr. Vernon L. Adams
Supervisor of Environmental Affairs
Georgia-Pacific Corporation
Post Office Box 919
Palatka, FL 32077

RE: PSD-FL-079, Georgia-Pacific Corporation

On December 4, 1984, a federal Prevention of Significant Deterioration permit (PSD-FL-079) was issued to your company to construct Recovery Boiler No. 5 and two smelt dissolving tanks, Combination Boiler No. 5, and Lime Kiln No. 5 at your kraft pulp mill in Palatka, Florida.

By letter dated January 8, 1985, Georgia-Pacific Corporation (G-P) filed a petition for review, pursuant to 40 CFR §124.19(a), with the Administrator of the United States Environmental Protection Agency (EPA) concerning the above referenced permit. Specifically, G-P requested a revision to Specific Condition No. 9 on the proposed No. 5 Recovery Boiler, which provided that "visible emissions (VE) shall not exceed 20% opacity...."

Subsequent to G-P's petition, several discussions between G-P and EPA personnel have transpired. In addition, engineers from both EPA and the Florida Department of Environmental Regulation (FDER) conducted an on-site inspection of the facility at Palatka, Florida, on May 16, 1985. As a result of these discussions and G-P's May 8, 1985, and September 9, 1985, proposals to withdraw the company's January 8, 1985, petition for review with the Administrator, EPA hereby modifies Specific Condition No. 9 for the No. 5 Recovery Boiler. Specific Condition No. 9 shall be as follows:

- 9(a) Visible emissions (VE) shall not exceed 20% opacity, as determined by EPA method No. 9, except as provided in 9(b). A continuous emissions monitor for opacity shall be required (40 CFR 60.284).
- 9(b) If any maintenance or upset of the air pollution control system (APCS) occurs, the permittee shall immediately diagnose the cause of the upset and establish the course of action to repair the APCS. Repair of the APCS shall commence as expeditiously as possible, unless a component has to be ordered from a vendor. However, the permittee shall maintain a stock of components of the APCS that have a history of repetitive failures. The VE shall not exceed 35% opacity, as determined by EPA method No. 9, during maintenance or upset conditions only.

10/15

~~PSD-FL-079~~

② Bruce - looks like we "won" no one. Good job!

③ Patty - copy NE district file in federal PSD file
Johnny Cole
done 10/30/85

DER

OCT 14 1985

BAQM

The following shall be required, but not limited to, as a source of action to repair the APCS during an upset condition: assessment of the availability of the defective component(s) and the purchase/delivery time involved (in days), assessment of the time required to repair the APCS (in man-hours), and a commitment to the Florida Department of Environmental Regulation on the completion date for repairing the APCS. In addition, records shall be kept of each maintenance and/or upset condition where the opacity limit is exceeded in accordance with General Condition No. 5.

In consideration of modification of Specific Condition No. 9, Specific Condition No. 11 for the No. 5 Recovery Boiler shall be modified as follows:

- 11(a) Immediately after construction has been completed, initial performance tests for PM, SO₂, TRS and VE shall be required. Test procedures shall be EPA reference methods 1, 2, 3, 5 or 17, 6, 9, and 16 as published in 40 CFR 60, Appendix A, dated July 1, 1978. Minimum sampling volume and time shall be as defined in 40 CFR 60, Subpart BB.
- 11(b) As part of the initial performance tests for PM and VE on the No. 5 Recovery Boiler, the company shall also demonstrate compliance with Specific Conditions No. 5 and No. 9(b) by testing the APCS with all exhaust gases from the boiler going into half of the APCS representing maintenance or upset conditions (i.e., half of the system energized). During these tests, a maximum black liquor solids (BLS) feed rate shall be established in which compliance can be achieved with Specific Conditions No. 5 and No. 9(b) for each side of the APCS. This BLS feed rate shall then be the maximum feed rate during periods of APCS maintenance or upset conditions, unless compliance can be demonstrated with Specific Conditions No. 5 and No. 9(b) at a higher BLS feed rate under APCS maintenance or upset conditions.

Furthermore, Specific Conditions No. 11 for the No. 5 Lime Kiln shall be reworded as follows:

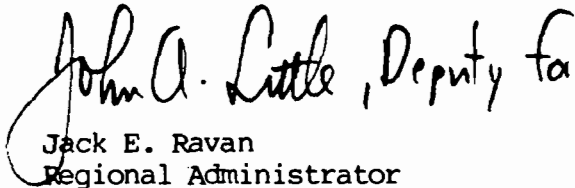
11. Immediately after construction has been completed, initial performance tests for PM, TRS, and VE shall be required. Test procedures shall be EPA reference methods 1, 2, 3, 5 or 17, 9, and 16 as published in 40 CFR 60, Appendix A, dated July 1, 1978. Minimum sampling volume and time shall be as defined in 40 CFR 60, Subpart BB.

The original PSD permit issued on December 4, 1984, and revisions contained herein shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed, any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1). Upon the expiration of the thirty (30) day period, we will confirm the status of the permit's effective date. The above revisions become a binding part of federal PSD permit (PSD-FL-079) issued on December 4, 1984. Notice of the original permit and these revisions will be published in the Federal Register in the near future.

Please be advised if construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely yours,


Jack E. Ravan
Regional Administrator

cc: Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

April 30, 1985

Mr. Wayne Aronson
Air Engineering
USEPA - Region IV
345 Courtland Street, NE
Atlanta, Georgia 30365

Dear Mr. Aronson:

Re: Draft Specific Conditions for the Recovery Boiler Operation
Georgial-Pacific Corporation: PSD-FL-079

The Florida Department of Environmental Regulation's Bureau of Air Quality Management provides the following draft "Specific Conditions" for the operation of the proposed new recovery boiler at Georgia-Pacific Corporation's existing mill in Palatka, Putnam County, Florida:

If any malfunction of the air pollution control system (APCS) occurs such that there is an upset and the visible emissions limiting standard of 20% opacity is to be exceeded up to 35% opacity, the permittee shall immediately diagnose the cause of the malfunction and establish the course of action to repair the APCS. Repair of the APCS shall commence immediately, unless a component has to be ordered from a vendor. The permittee shall be required to maintain a stock of components of the APCS that have a history of going defective or malfunctioning on a regular basis.

The following shall be, but not limited to, required as a course of action to repair the APCS during a malfunction or upset: assessment of the

Mr. Wayne Aronson
Page Two
April 30, 1985

availability of the defective component(s) and the purchase/delivery time involved in days; assessment of the time required to repair the APCS in man-hours; and, a commitment to the regulatory agency or its designee on the completion date for repairing the APCS. In all cases of upset or malfunction of the APCS, the permittee shall give the same priority to maintain the operation of the APCS that would and is given to the operation of the production equipment.

Thank you for allowing the bureau the opportunity to provide these comments. If there are any questions, please call Bruce Mitchell at (904)488-1344, or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/rw



Georgia-Pacific Corporation Palatka Operations
Southern Pulp & Paper Division
P.O. Box 919
Palatka, Florida 32978-0919
Telephone (904) 325-2004

RECEIVED
MAY 3 1989
DER-JACKSONVILLE

RECEIVED

MAY 3 1989

DER-BAQM

April 28, 1989

Mr. William Stewart
Florida Department of Environmental Regulation
3426 Billis Rd.
Jacksonville, Florida 32207

Dear Bill;

We recently received letters from you requesting that we submit operating permit applications for our No. 5 Recovery Boiler, No. 5 Smelt Dissolving Tanks, No. 5 Lime Kiln, and No. 5 Combination Boiler. These are sources for which we currently have construction permits, but have not as yet constructed. Due to changes in economic conditions and foreseeable plans for the mill we do not intend to construct these sources at this time and do acknowledge that the construction permits will expire in July of 1989. We do however appreciate all of the assistance the department has provided in helping us to obtain these permits.

If you have any questions, please call me at 904-325-2001.

Sincerely,

Vernon L. Adams
Superintendent of
Environmental Affairs

cc: W. L. Baxter
H. Hirschman
E. Schmidt

PSD-FL-079
AC 54-43773