

Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

July 26, 2005

CERTIFIED MAIL - Return Receipt Requested

Mr. Theodore D. Kennedy Vice President – Palatka Operations Georgia-Pacific Palatka Mill P.O. Box 919 Palatka, Florida 32178-0919

RE: Request to Replace the Lime Kiln Shell and Associated Tube Coolers Project No.: 1070005-030-AC/PSD-FL-345

Dear Mr. Kennedy:

On September 4, 2004, the Department received a request to replace a portion of the lime kiln shell and all of the associated tube coolers. On April 14, 2005, Georgia Pacific updated and amended this request. On June 8, 2005, the Department received a response to the Department's request for information letter dated May 13, 2005. However, the air dispersion modeling files were not submitted with this request. On July 12, 2005, Georgia Pacific provided these files to the Department based on the Department's July 8, 2005, request for additional information. Please provide all assumptions, calculations, and reference material(s) that are used or reflected in any of your responses to the following issue.

Based on our review of these files and the associated modeling information in your application, Georgia Pacific needs to address the predicted PM₁₀ annual and 24-hour National Ambient Air Quality (NAAQS) and 24-hour PM₁₀ Class II increment violations just outside the fence line in the vicinity of Georgia Pacific's sawmill. Rule 62-212.300(1), F.A.C., prevents the Department from issuing a permit modification for the lime kiln until it has reasonable assurance that Georgia Pacific will mitigate the predicted violations in the vicinity of the sawmill.

The Department will resume processing this application after receipt of the requested information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,

Air Permitting North

Bureau of Air Regulation

JFK/ch

cc:

Gregg Worley, U.S. EPA, Region 4 Dave McNeal, U.S. EPA, Region 4 Lee Page, U.S. EPA, Region 4 John Bunyak, NPS Chris Kirts, NED Myra J. Carpenter, G-PC Mark J. Aguilar, P.E., G-PC

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Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

December 20, 2005

CERTIFIED MAIL - Return Receipt Requested

Mr. Theodore D. Kennedy Vice President – Palatka Operations Georgia-Pacific Palatka Mill P.O. Box 919 Palatka, Florida 32178-0919

RE: Modification to the No. 4 Recovery Boiler Project No.: 1070005-035-AC/PSD-FL-367

Dear Mr. Kennedy:

On November 18, 2005, the Department received your application for an air construction permit to modify the No. 4 Recovery Boiler at the Palatka mill, and we received the modeling files on November 21, 2005. The modeling information is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to this request require new calculations, please submit the new assumptions, calculations, reference material and appropriate revised pages of the application form.

The Department is forwarding the attached e-mail from the federal land manager to you. The Department has verbally clarified and communicated further information to the federal land manager concerning Comments 1, 2 and the guidance in the next to last paragraph concerning the use of Method 2 and a maximum relative humidity of 95%. However, even with this clarification, the federal land manager does not accept the approach of eliminating potential weather events based upon an hour by hour review. Please provide an explanation of how to remove the problem of 11 days showing visibility impairment above the 5% threshold, and provide the CALPUFF results showing this removal, along with the new emission inputs.

The Department will resume processing this application after receipt of the requested information. If you have any questions regarding this matter, please call me at (850)921-8986.

Sincerely,

Cleve Holladay Air Permitting North Bureau of Air Regulation

CGH/ch

Enclosure

cc: Gregg Worley, U.S. EPA, Region 4
Dave McNeal, U.S. EPA, Region 4
Lee Page, U.S. EPA, Region 4
John Bunyak, NPS
Chris Kirts, NED
Myra J. Carpenter, G-PC
Mark J. Aguilar, P.E., G-PC

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