

## Department of Environmental Protection

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

Colleen M. Castille Secretary

May 13, 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 15, 2005, the Department received an updated response to its Request for Information (RAI) letters dated October 1, 2004 and April 5, 2005. Based on our review of the proposed project and this response, we have determined that the following additional information is needed in order to continue processing this application package. We have determined that the following additional information is needed in order to continue processing this application package. Please provide

all assumptions, calculations, and reference material(s), that are used or reflected in any of your responses

to the following issues:

1. Rule 62-212.400(5)(h)5, F.A.C requires the applicant to provide information relating to the air quality impact of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect. Please provide this information. The additional impacts section in the updated response, Section 3.5, does not adequately address this requirement.

2. In Section 3.2.10 (Source Impact Analysis Results) maximum annual and 24-hour PM<sub>10</sub> NAAQS results and 24-hour PM<sub>10</sub> PSD Class II increment results show predicted violations of the respective NAAQS and increments at receptors located on or near GP's Sawmill Mill. However, in this same section, the maximum project impacts are shown to be less than significant at the receptors showing violations. Do the modeled impacts of the all of the PM<sub>10</sub> sources at the Georgia Pacific Palatka facility result in violations of the applicable PM<sub>10</sub> NAAQS or increment at any of these receptors entirely on their own?

"More Protection, Less Process"

Mr. Theodore D. Kennedy
Vice President – Palatka Operations
Georgia-Pacific
Palatka Mill
Request to Replace the Lime Kiln Shell and Associated Tube Coolers
Project No.: 1070005-030-AC/PSD-FL-345
Page 2 of 2

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

Jeff Koerner

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