



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

January 7, 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 December 8, 2004, the Department received a response to an RAI dated October 1, 2004. Based on our review of the proposed project and the RAI (Request for Additional Information) response, 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. In the October 1, 2004 RAI, a cost analysis of a new lime kiln with tube coolers of like-and-kind pursuant to the definition of an "affected facility" in accordance to 40 CFR 60, Subpart BB, was requested. The response just provided a total cost estimate with no itemized breakdown for a new lime kiln. Again, please provide a cost analysis of a new lime kiln with tube coolers of like-and-kind pursuant to the definition of an "affected facility" in accordance to 40 CFR 60, Subpart BB, and 40 CFR 63, Subpart MM. Please be sure to provide within the analysis the ability to distinguish the "capital costs" from other costs of a new lime kiln. If the proposed modified lime kiln becomes subject to either or both of these regulations, then the BACT determination's starting base emissions will be much lower than the original submission and the proposed BACT determination will have to be reevaluated and resubmitted.
2. Due to the age and physical deterioration of the existing lime kiln, the apparent reduction of actual production efficiency over the years of operation, the recent replacement of the ID fan (May 2004) and the upcoming replacement of the burner, this current request to replace the hot end of the lime kiln, including the associated tube coolers, does not appear to be routine maintenance. This project appears to be a physical modification of the existing lime kiln to improve reliability of lime (CaO) production, allowing for an increase in actual emissions and production and, therefore, be able to potentially increase actual emissions and production from upstream and downstream emissions unit operations to the lime kiln. Please explain why these collective changes should be considered routine maintenance.
3. Independent funding of various projects does not establish independence of the activity and remove the potential of a modification or new construction from being a Phased PSD Project or to be considered one. Hence, all contemporaneous emission changes that have occurred over the last five years shall be considered contemporaneous

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with this proposed activity. Therefore, please establish the past contemporaneous emission changes and evaluate them in conjunction with the emission changes proposed for this project for significant impact analyses, increment consumption and ambient air quality impact analyses. Also, please include any future contemporaneous emission changes that will be associated with and affected by this proposed change from other emission unit operations, both upstream and downstream.

4. You did not provide an adequate response to the original request (#4) previously submitted in the RAI dated October 1, 2004. For PSD purposes, please provide the daily production rate of the lime kiln for the last two years (24-months) in order to determine the baseline production rate of the lime kiln; and, please include 2004 data.

5. You did not answer the question (#6) previously submitted in the RAI dated October 1, 2004. Even though the information is attempting to state that the Kiln shell portion and tube coolers that are being replaced are part of a maintenance project, will the proposed changes allow for an increase in production from its present configuration and operation? A yes or no is the preferred response.

6. You did not answer the question (#7) previously submitted in the RAI dated October 1, 2004. Will there be an increase in production from the baseline production rate (see No. 4, above) after the proposed changes are completed? A yes or no is the preferred response.

7. Was the new ID fan that was installed in March 2004, sanctioned under an air construction permit? If so, please provide the project number. Also, please provide the design calculations and vendor order for the latest ID fan.

8. Please provide all of the dates that the ID fan has been replaced since the existing lime kiln was built.

9. On all of the previous and new ID fans, please provide the design fan characteristics for each unit, including their rpms, pressure drops, curves, volumetric flow rates, etc. In addition and for the previous/last and new ID fans, please provide the volumetric flow rates established in the performance tests conducted on the lime kiln since 1998.

10. If any of this RAI's responses require any changes to the pollutant emissions and subsequent modeling issues, specifically significant impact analyses, increment consumption and ambient air quality impact analyses, then please make sure that these changes are addressed in the associated modeling and increment requirements and exercises per the regulations. Therefore, the previous RAI's #10 will be restated in case there is/are some emissions change in the response(s) to this RAI:

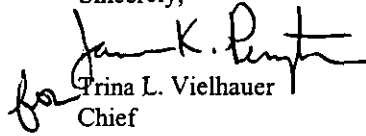
Pursuant to Rule 62-212.400(5)(h)5., F.A.C., please provide the information relating to the air quality impacts of, and the nature and extent of, all general commercial, residential, industrial and other growth that has occurred since August 7, 1977, in the area the facility or modification would affect.

11. You did not answer the question (#11) previously submitted in the RAI dated October 1, 2004. For the potential applicability of 40 CFR 60, Subpart BB, please use Appendix C, 40 CFR 60, to determine if there is/are an emissions rate increase for the pollutants affected by this project.

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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,


Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/bm

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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 P.O. Box 919
 City, State, ZIP+4
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