



Palatka Pulp and Paper Operations
Consumer Products Division

RECEIVED

P.O. Box 919
Palatka, FL 32178-0919
(386) 325-2001

AUG 06 2008

BUREAU OF AIR REGULATION

August 1, 2008

Mr. Jeffery F. Koerner, Air Permitting North Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Re: Georgia-Pacific Consumer Operations LLC, Palatka Operations
Draft Air Permit No. PSD-FL-393, Project No. 1070005-045-AC
Draft Permit for Modifications to No. 4 Combination Boiler**

Dear Mr. Koerner:

This letter is in response to the conference call last week between you and Bruce Mitchell of DEP, and Mike Curtis and Ron Reynolds of Georgia-Pacific (GP), regarding the proposed limit for particulate matter (PM) emissions under the subject draft permit. DEP has proposed a BACT limit of 0.03 lb PM/MM Btu in the draft permit as compared to the 0.04 lb PM/MM Btu BACT level proposed by GP in the PSD application for the No 4 Combination Boiler. GP stated in the comments that in order to be assured of meeting a limit of 0.03 lb/MM Btu, substantial costly modifications to the existing precipitators would be required that would not be cost effective under BACT guidelines.

In order to move forward, DEP has proposed an initial PM limit of 0.04 lb/MM Btu to be reviewed 12 months after initial startup of the No. 4 Combination Boiler after the modifications. During that 12-month period, GP will conduct quarterly stack testing for PM emissions to verify actual performance of the combined precipitator units and to determine if the source can operate the boiler at a lower PM emission rate with an adequate margin of safety. After the 12-month period, GP will review the quarterly stack testing results and will agree to lower the PM emission limit to 0.03 if the parties agree that it is warranted. GP also agrees to install two Continuous Opacity Monitoring Systems, one on each of the two stacks that will be serving the No. 4 Combination Boiler after it is modified.

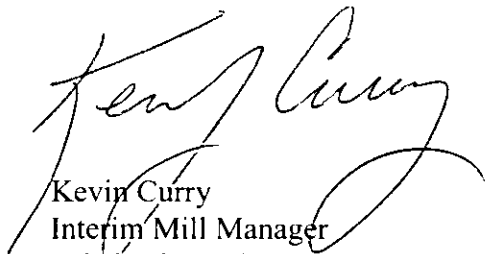
GP is committed to reducing actual emissions where a lower BACT limit is technically and economically feasible. GP is confident that the project to increase the bark firing capacity of the No. 4 Combination Boiler and the addition of the electrostatic precipitator from the No. 5 Power Boiler as a second unit for the No. 4 Combination Boiler, if

Jeffery F. Koerner
8/1/2008

approved, will result in significant reductions of actual PM emissions compared to the average PM emission rate over the past several years. Additionally, once the Mill has eliminated the use of No. 6 fuel oil from the No. 4 Combination Boiler, actual SO₂ emissions will also be significantly reduced.

If there are any questions regarding this response, please contact Mike Curtis at (386) 329-0918.

Sincerely,



Kevin Curry
Interim Mill Manager
Palatka Operations

Cc: T. Champion, S. Matchett, W. Galler – GP, Atlanta
M. Curtis, S. Single – Palatka Mill

Bmm } 8-6-08
S=SS }