



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 15, 2010

Sent by Electronic Mail – Received Receipt Requested

Mr. Gary L. Frost
Vice President – Palatka Operations
Georgia-Pacific Consumer Operations LLC
Palatka Mill
P.O. Box 919
Palatka, Florida 32178-0919

Re: Project No. 1070005-065-AC/PSD-FL-393A
Request for Additional Information
No. 4 Combination Boiler, Request to Extend Permit Expiration Date

Dear Mr. Frost:

On January 25, 2010, the Department received a request for an air construction permit expiration date extension. The affected permit is 1070005-045-AC/PSD-FL-393, which was issued for modifications to the No. 4 combination boiler (CB). The application is incomplete. Based on our review of the proposed project, we have determined that the following additional information is needed in order to continue processing this request. Please provide all assumptions, calculations and reference materials that are used or reflected in any of your responses to the following issues:

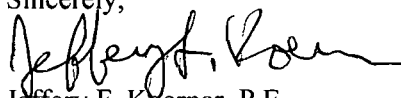
1. Please review the original netting table for Permit No. 1070005-045-AC/PSD-FL-393. Please revise this table for any emissions decreases or increases that are no longer within the contemporaneous 5-year period prior to the project.
2. The original permit was issued on September 26, 2008, and expires on March 26, 2010. The permit included a determination of best available control technology (BACT) for carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM), PM with an aerodynamic diameter equal to 10 microns or less (PM₁₀) and volatile organic compounds (VOC). Condition No. 7 in Section 2 of the original permit requires construction to commence within 18 months of receipt of the permit in accordance with Rule 62-212.400(12), Florida Administrative Code (F.A.C.). Because construction has not yet begun and the 18-month period ends on March 26, 2010, then authorization to construct will expire on this date pursuant to Rule 62-212.400(12)(a), F.A.C., Source Obligation. Therefore, provide a revalidation of the BACT determinations for the affected pollutants and for any new pollutants that may be affected if there are any changes to the contemporaneous increases and decreases and an update to the netting table.
3. Regarding modeling, if there are any changes that need to be reviewed, please address and submit as appropriate. In addition, if there are any increment issues that need to be reviewed, please address and submit as appropriate. Also, if there are any impact issues that need to be reviewed, please address and submit as appropriate.
4. Please provide an update of the progress toward the elimination of No. 6 fuel oil and the conversion to natural gas for the No. 4 combination boiler, since the creditable SO₂ reductions depend on this action.

REQUEST FOR ADDITIONAL INFORMATION

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,



Jeffery F. Koerner, P.E.
New Source Review Section Administrator
Bureau of Air Regulation

JFK/bm

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Gary Frost, Georgia-Pacific Consumer Operations LLC (gary.frost@gapac.com)
Mr. Ron Reynolds, Georgia-Pacific Consumer Operations LLC (ron.reynolds@gapac.com)
Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
Mr. Chris Kirts, Northeast District Office (christopher.kirts@dep.state.fl.us)
Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)
Ms. Heather Abrams, U.S. EPA, Region 4 (abrams.heather@epamail.epa.gov)
Ms. Ana Oquendo, U.S. EPA, Region 4 (oquendo.ana@epa.gov)
Ms. Catherine Collins, Fish and Wildlife Service (catherine_collins@fws.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Monday, February 15, 2010 10:51 AM
To: 'gary.frost@gapac.com'
Cc: 'ron.reynolds@gapac.com'; 'mjaguila@gapac.com'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'catherine_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: GA-Pacific Consumer Operations LLC - PALATKA PULP & PAPER MILL (1070005-065-AC/PSD-FL-393A)
Attachments: RAI 1070005-065-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]
Sent: Monday, February 15, 2010 12:24 PM
To: Livingston, Sylvia; Frost, Gary (Florida)
Cc: Aguilar, Mark J.; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'catherine_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: RE: Request for Additional Information: GA-Pacific Consumer Operations LLC - PALATKA PULP & PAPER MILL (1070005-065-AC/PSD-FL-393A)

I have received and viewed the subject document. Please accept my reply as verification for Gary Frost.

Thank you,

Ron Reynolds
Environmental Engineer - Air Quality
Georgia Pacific - Palatka Mill
Office 386-329-0967
Cell 386-916-3133

-----Original Message-----

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, February 15, 2010 10:51 AM
To: Frost, Gary (Florida)
Cc: Reynolds, Ron E.; Aguilar, Mark J.; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'catherine_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
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Thank you,