



Palatka Pulp and Paper Operations
Consumer Products Division

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

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

RECEIVED

November 9, 2007

NOV 13 2007

BUREAU OF AIR REGULATION

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: Project No. 1070005-045-AC/PSD-FL-393
Modification of the No. 4 Combination Boiler and No. 4 Recovery Boiler
Response to Request for Additional Information No. 1**

Dear Mr. Koerner:

This responds to your June 29, 2007 request for additional information regarding our PSD permit application to modify the No. 4 Combination Boiler and No. 4 Recovery Boiler.

For ease of reference, we have repeated the DEP's questions (*in italicized font*) prior to the answers.

No. 4 Combination Boiler

Question No. 1. *The revised application proposes to fire natural gas as the startup and supplemental fuel in the No. 4 combination boiler. Oil firing would continue until the gas burners are installed. Once a reliable supply of natural gas is available, oil firing will be permanently discontinued. Describe the proposed schedule for commencing and completing the project (e.g., upgrading wood fuel delivery system, installing an new overfire air system, replacing the existing cyclones with mechanical dust collectors, modifying the existing ESP and adding the existing ESP from the No. 5 power boiler, modifying the NCG ductwork for incorporation into the new overfire air system, possible modification of the under-air grate distribution, and replacing the existing oil burners with new, low-NO_x burners for firing natural gas).*

GP's Response to Question No. 1:

The initial phase of the project will include all changes except the conversion to natural gas. The initial phase will include:

- Upgrade of wood-fuel delivery system with new bark conveyors and feed bin.

- Installation of a new over-fire air (OFA) system,
- Installation of a mechanical dust collector.
- Installation of a bottom-ash handling system.
- Modification of ductwork so that the No.5 Power Boiler ESP/stack will serve the No. 4 Combination Boiler in parallel with the existing No. 4 Combination Boiler ESP/stack.
- Modification of ductwork to introduce dilute non-condensable gases (DNCGs) into the new OFA system.

The existing NCG ductwork and under-grate air distribution will not be modified as part of this project. We plan to complete this initial phase during an outage in May-June 2008, contingent on timely approvals, on-time deliveries, etc.

The project to convert the No. 4 Combination Boiler to natural gas in lieu of fuel oil will require additional pipeline capacity to be installed by Florida Gas Transmission (FGT). GP has initiated the process with FGT to provide this capacity. FGT has estimated a minimum of two years and possibly as long as three years for completion, but is not yet able to provide a firm date at this early stage. GP will complete the conversion of the No. 4 Combination Boiler to natural gas within 180 days of the completion of the necessary pipeline modifications by FGT.

Question No. 2. Provide the following information:

- A table summarizing emissions rates for natural gas, wood and natural gas plus wood in conventional units (e.g., grains/dscf @ 8% oxygen, lb/MM Btu, ppmvd @ 8% oxygen, etc.), lb/hour and tons per year. Please include emissions rates for CO, NO_x, PM, PM₁₀, SAM, SO₂, and VOC.*

GP's Response to Question No. 2a:

See tables 2a (1) and 2a (2) below. The pollutant emission rates for firing a combination of both wood and natural gas would be calculated using the same emission factors as those used in the two tables below, multiplied by the respective quantity of each of the two fuels fired.

2b. The maximum burner capacity for firing natural gas in MM Btu/hour

GP's response: 427.0 MM Btu/hr

2c. Any fuel consumption limits on firing natural gas

GP's response: 0.427 MM ft³/hr

2d. The corresponding application pages for firing natural gas and wood/bark

GP's response: See attached (electronic) application pages

Question No. 3. Summarize any new BACT determinations posted on the RACT/BACT/LAER Clearinghouse for CO, NO_x, PM/PM₁₀ and VOC. Provide an updated BACT review based on

GP's Response to Question No. 2a:

Table 2a (1)

Pollutant Emission Rates for No. 4 Combination Boiler Burning 100% Natural Gas, LVHC NCGs, SOGs, and HVLCs						
	PM/PM₁₀	SO₂	SAM	NO_x	CO	VOC
lb/MM Btu	Gas-0.0076	Gas-0.0006 NCGs-1.08 SOGs-1.16 HVLCs-0.19 Total-2.43	Gas-0.0 NCGs-0.048 SOGs-0.051 HVLCs-0.0084 Total-0.107	Gas-0.15 NCGs-0.10 SOGs-0.0 HVLCs-0.0 Total-0.25	Gas-0.10 Total-0.10	Gas-0.0055 Total-0.0055
lbs/hr	Gas-3.25	Gas-0.3 NCGs-462.9 SOGs-496.0 HVLCs-82.6 Total-1,041.8	Gas-0.0 NCGs-20.4 SOGs-21.8 HVLCs-3.6 Total-45.8	Gas-64.05 NCGs-43.2 Total-107.3	Gas-42.7 Total-42.7	Gas-2.35 Total-2.35
tons/yr	Gas-14.2 Total-14.2	Gas-1.1 NCGs-264.9 SOGs-283.8 HVLCs-236.3 Total-786.1	Gas-0.0 NCGs-11.6 SOGs-12.5 HVLCs-10.4 Total-34.5	Gas-280.5 NCGs-37.8 Total-318.3	Gas-187.0 Total-187.0	Gas-10.3 Total-10.3
ppmvd	---	Gas-0.3	Gas-0.0	Gas-90.4	Gas-99.0	Gas-3.5 (as propane)
grains/dscf @ 8% O₂	Gas-0.0038	---	---	---	---	---

Gas firing rate = 427.0 MM Btu/hr. Exhaust gas flow rate = 98,900 dscfm

GP's Response to Question No. 2a:

Table 2a (2)

Pollutant Emission Rates for No. 4 Combination Boiler Burning 100% Wood/Bark, LVHC NCGs, SOGs, and HVLCs						
	PM/PM₁₀	SO₂	SAM	NO_x	CO	VOC
lb/MM Btu	PM-Wood-0.04 PM Wood Total-0.04 PM ₁₀ -Wood-0.03 PM ₁₀ Wood Total-0.03	Wood-0.025 NCGs-0.54 SOGs-0.57 HVLCs-0.15 Total-1.29	Wood-0.025 NCGs-0.024 SOGs-0.025 HVLCs-0.0064 Total-0.14	Wood-0.24 NCGs-0.077 Total-0.32	Wood-0.5 Total-0.5	Wood-0.017 Total-0.017
lbs/hr	PM-Wood-22.6 PM Total-22.6 PM ₁₀ -Wood-16.7 PM ₁₀ Wood Total-16.7	Wood-14.1 NCGs-462.9 SOGs-496.0 HVLCs-82.6 Total-1,055.6	Wood-0.6 NCGs-20.4 SOGs-21.8 HVLCs-3.6 Total-46.4	Wood-135.4 NCGs-43.2 Total-178.6	Wood-282.0 Total-282.0	Wood-9.6 Total-9.6
tons/yr	PM Wood-98.8 PM Wood Total-98.8 PM ₁₀ -Wood-73.1 PM ₁₀ Wood Total-73.1	Wood-61.8 NCGs-264.9 SOGs-283.8 HVLCs-236.3 Total-846.8	Wood-2.7 NCGs-11.7 SOGs-12.5 HVLCs-10.4 Total-37.3	Wood-592.9 NCGs-37.8 Total-630.7	Wood-1,235.2 Total-1,235.2	Wood-42.0 Total-42.0
ppmvd	---	Wood-10.4	Wood-0.3	Wood-139.5	Wood-477.4	Wood-10.3 (as propane)
grains/dscf @ 8% O₂	PM-Wood-0.0195 PM ₁₀ Wood-0.0144	---	---	---	---	---

Wood/Bark firing rate = 564.0 MM Btu/hr; Exhaust gas flow rate = 135,400 dscfm

the firing of natural gas and include any new postings. Propose specific BACT standards for each pollutant.

GP's Response to Question No. 3:

See attached (electronic) BACT analysis

No. 4 Recovery Boiler:

Question No. 4. *For the request regarding SO₂ emissions from the No. 4 recovery boiler, provide the following information: identify the number of oil burners and the maximum rated capacity of each (vendor specification) in MM Btu/hour and gallons per hour; describe when the fuel oil is fired as a supplemental fuel; identify the emission rate in terms of "ppmvd @ 8% oxygen" that is equivalent to the maximum fuel oil sulfur content (2.35% by weight).*

Recently issued Permit No. PSD-FL-380 established an SO₂ emissions cap of 153.9 tons per consecutive 12 months. This is approximately 12 ppmvd @ 8% oxygen and 35.1 lb/hour based on an annual average with compliance demonstrated by certified CEMS. In addition, the PSD permit restricts residual oil firing to no more than 7,860,640 gallons during any consecutive 12 months, which represents an annual capacity factor of approximately 10% of the maximum annual heat input rate. The long-term emissions cap and annual fuel restriction recognizes the typically low SO₂ emissions when firing the primary fuel of BLS and that residual oil is typically fired for startup and infrequently as a supplemental fuel.

In the current Title V permit, the SO₂ emissions standards are 75 ppmvd @ 8% oxygen and 109.9 lb/hour based on stack testing. The application maintains that these two standards do not correspond and were accepted in a permit in error. The corresponding mass emissions rate for 75 ppmvd @ 8% oxygen should have been 219.8 lb/hour. Therefore, the application proposes to replace the current standards with the following based on compliance by CEMS:

- a. 150 ppmvd @ 8% oxygen (439.4 lb/hour) based on a 3-hour average, and*
- b. 100 ppmvd @ 8% oxygen (292.8 lb/hour) based on a 24-hour average.*

To support this proposal, the applicant conducted an air dispersion modeling analysis at the Department's request based on the proposed emissions standards that showed compliance with the Ambient Air Quality Standards and PSD Class II increments for SO₂. In addition, the application requests that the firing of compliant residual oil (2.35% sulfur by weight) stand as the compliance method during startup, which may last up to 24 hours. To support this proposal, the applicant conducted an air dispersion modeling analysis based on 100% oil firing that showed compliance with the Ambient Air Quality Standards for SO₂. The following table summarizes the air quality analyses:

Operation and Averaging Period	No. 4 Recovery Boiler Emissions Rates		AAQS Analysis		PSD Class II Analysis	
			Impact	AAQS	Impact	Increment
	lb/hour	ppmvd @ 8%O ₂	μ/m ³	μ/m ³	μ/m ³	μ/m ³
Normal Operation						
3-hour	439.4	150	642	1300	152	512
24-hour	292.8	100	197	260	60	91
Annual	35.1	12	33	60	8	20
Startup						
3-hour	1849.2	632.2*	792	1300		
24-hour	1040.6	355.8*	221	260		
Annual	35.1	12	33	60		

*Verify that these concentrations are approximately equivalent to the mass emissions rates used in the modeling analysis

Does this properly describe the background for this issue, the proposed SO₂ standards and the supporting air quality analyses?

GP's Response to Question No. 4: (Part 1 - "identify the number of oil burners and the maximum rated capacity of each (vendor specification) in MM Btu/hour and gallons per hour; describe when the fuel oil is fired as a supplemental fuel; identify the emission rate in terms of "ppmvd @ 8% oxygen" that is equivalent to the maximum fuel oil sulfur content (2.35% by weight).").

The No. 4 Recovery Boiler has eight (8) "load" burners and four (4) "startup" burners. The vendor (Combustion Engineering) flow capacities are identified in the attached drawing (Fuel Piping Schematic E-1-002-624-03) and are summarized in Table 1 below.

	Fuel Oil Flow (gal/hr)	MM Btu/hr (calculated*)	Fuel Oil Flow (gal/hr)	MM Btu/hr (calculated*)
	Per Burner	Per Burner	Combined	Combined
Startup Burners (4 each)	250 @88 psig	37.5	1,000	150
Load Burners (8 each)	480 @80 psig	72	3,840	576

* assuming 150,000 Btu/gal

No. 6 fuel oil is fired as supplemental fuel on an as-needed basis, primarily during startup and shutdown of the boiler, but also during periods of high steam demand, malfunctions and/or maintenance of the black liquor system, and during other process upsets in order to stabilize boiler operation.

SO₂ Emission Rates During Normal Operation: The data presented in the air quality summary table above for SO₂ emissions during normal operations are a correct representation of the potential-to-emit calculations shown on Page B-38 of Attachment B from the July 2006 PSD permit application for the No. 4 Recovery Boiler and No. 4 Lime Kiln.

Start-up Emission Rates: The 3-hour SO₂ concentration in ppmvd, corrected to 8% oxygen content that is approximately equivalent to 1,849.2 lbs/hr (based on the maximum fuel oil sulfur content of 2.35%) is 631.5 ppmvd as shown in the calculation below:

$$\text{ppmvd} = 1,849.2 \text{ lbs/hr} \times 1,545.6 \text{ ft-lb/lb-n } ^\circ\text{R} \times 528 ^\circ\text{R} / 294,000 \text{ dsft}^3/\text{min} \times 2,116.8 \text{ lb/ft}^2 \times 64 \text{ lb SO}_2/\text{lb-n SO}_2 \times 60 \text{ min/hr} = 631.5 \text{ ppmvd}$$

The concentration value of 631.5 ppmvd is approximately equivalent to the SO₂ concentration modeled by Golder & Associates, Inc. as the 3-hour average SO₂ startup emissions rate of 632.2 ppmvd in the air quality analyses summary table shown above. The 3-hour emissions rate of 1,849.2 lbs/hr is based on an approximate fuel oil firing rate of 83.5 gpm of fuel oil with a sulfur content of 2.35% (wt.) as shown below using the emission factor from Table 1.3-1 of AP-42:

$$\begin{aligned} \text{lbs SO}_2/\text{hr} &= 157 \text{ lbs SO}_2/\text{M gal fuel oil} \times 2.35 \times 83.5 \text{ gal/min} \times 60 \text{ min/hr} = 1,848.4 \text{ lbs SO}_2/\text{hr} \\ &\sim 1,849.2 \text{ lbs SO}_2/\text{hr} \end{aligned}$$

Similarly, the 24-hour SO₂ concentration in ppmvd, corrected to 8% oxygen content that is equivalent to 1,040.6 lbs/hr (based on the maximum fuel oil sulfur content of 2.35%) is 355.35 ppmvd as shown in the calculation below:

$$\text{ppmvd} = 1,040.6 \text{ lbs/hr} \times 1,545.6 \text{ ft-lb/lb-n } ^\circ\text{R} \times 528 ^\circ\text{R} / 294,000 \text{ dsft}^3/\text{min} \times 2,116.8 \text{ lb/ft}^2 \times 64 \text{ lb SO}_2/\text{lb-n SO}_2 \times 60 \text{ min/hr} = 355.35 \text{ ppmvd}$$

The concentration value of 355.35 ppmvd is approximately equivalent to the concentration modeled by Golder & Associates, Inc as the 24-hour average SO₂ startup emissions rate of 355.8 ppmvd in the air quality analyses summary table shown above. The 24-hour emissions rate of 1,040.6 lbs/hr is based on an approximate fuel oil firing rate of 47 gpm of fuel oil with a sulfur content of 2.35% (wt.) as shown below using the emission factor from Table 1.3-1 of AP-42:

$$\begin{aligned} \text{lbs SO}_2/\text{hr} &= 157 \text{ lbs SO}_2/\text{M gal fuel oil} \times 2.35 \times 47 \text{ gal/min} \times 60 \text{ min/hr} = 1,040.4 \text{ lbs SO}_2/\text{hr} \\ &\sim 1,040.6 \text{ lbs SO}_2/\text{hr} \end{aligned}$$

The slight discrepancies in the calculated SO₂ emissions rates shown above and the concentration values modeled by Golder & Associates are simply due to variations in number rounding performed by GP versus Golder.

GP's Response to Question No. 4: (Part 2 – “Does this properly describe the background for this issue, the proposed SO₂ standards and the supporting air quality analyses?”).

In GP's previous response of May 25, 2007, we requested that the firing of compliant fuel oil stand as the short-term compliance method not only during startup periods, but “during periods when fuel oil is burned, such as start ups, shutdowns, malfunctions and other temporary upset or maintenance situations...” In that response, GP also proposed a maximum short-term (3-hour) oil firing rate of 84 gpm, which also approximates the maximum 3-hour startup mass emissions rate in the air quality analysis shown above. This proposed value was estimated conservatively based on historical maximum rates during startup. However, based on the actual burner specifications in table 1 above, the maximum capacity is 81 gpm which will provide adequate margin of compliance with the short-term AAQS. A 3-hour limit on firing rate will not be necessary.

Question No. 5. *Based on current CEMS data, what are maximum measured SO₂ emissions from the No. 4 recovery boiler when firing only BLS? The Department is considering separate standards for BLS firing and oil firing. When oil is used to supplement BLS, the standards would be prorated based on the heat input from each fuel.*

GP's Response to Question No. 5:

GP has conducted a review of 2007 SO₂ hourly CEMs data (excluding periods of boiler startup, shutdown, malfunctions, downtime) inclusive only of hours when the #4 Recovery Boiler was burning black liquor >3 MM lbs/day, and burning no significant (<5 gpm) fuel oil. The resulting data included 2700 hours and hourly maximum SO₂ concentrations (corrected to 8% O₂) up to 21 ppmvd, although the average was <1 ppmvd (corrected to 8% O₂).

GP is receptive to DEP's consideration of separate standards for fuel oil and BLS, but would prefer not to have a prorated concentration-based standard for periods when the fuels are burned in combination. This would present an onerous burden for the Mill by requiring the calculation of a pro-rated SO₂ standard at all times when the boiler is burning a combination of black liquor and No. 6 fuel oil, dependent upon the heat input ratio of the fuels. The 3-hour and 24-hour SO₂ standards (150 ppmvd and 100 ppmvd) proposed for normal operation will be sufficient for determining compliance during most operating conditions including BLS firing supplemented with fuel oil. During startup, shutdown, and other periods when fuel oil is fired in the absence of or with minimal BLS, the proposed standards for startup conditions (3-hour avg. of 632 ppmvd and 24-hour avg. of 356 ppmvd) should apply. As a back-up to the short-term concentration based limits, GP also requests the flexibility to prove compliance with the associated short-term mass (lb/hr) limits based on actual fuel oil usage and sulfur content, as is the case currently with the #5 power boiler and the #4 combination boiler. This is important because, during startup conditions of high stack O₂ (17-20%), the CEMS O₂-corrected SO₂

concentration is increased by a factor of 3 to 6 times and does not correctly predict the mass emissions rate, which is the critical factor. The actual SO₂ mass emissions from fuel oil can readily be calculated if the concentration limit becomes an issue. Of course, the annual SO₂ limit will be unchanged, regardless of fuel mix.

GP spent a significant amount of time developing these proposed standards, with DEP's guidance, and proved through dispersion modeling that the No. 4 Recovery Boiler would not cause an exceedance of any of the time-weighted SO₂ NAAQS standards when complying with these limits.

If there are any questions regarding this response, please do not hesitate to contact Mike Curtis at (386) 329-0918.

I, the undersigned, am the responsible official of the source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and the data contained in this document are true, accurate, and complete.

Sincerely,

A handwritten signature in cursive script that reads "Keith Wahoske".

Keith W. Wahoske, Vice-President
Palatka Operations

cc: W. Galler, T. Champion, T. Wyles, S. Matchett, R. Reynolds, M. Curtis - GP

Harvey, Mary

From: Harvey, Mary
Sent: Monday, October 29, 2007 3:41 PM
To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, NPS'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC
Attachments: Letter-Keith Wahoske.pdf

Tracking:	Recipient	Read
	'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'	
	'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'	
	'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'	
	'Mr. David Buff, Golder Associates'	
	Kirts, Christopher	Read: 10/30/2007 10:36 AM
	'Ms. Kathleen Forney, EPA Region 4'	
	'Mr. Jim Little, EPA Region 4'	
	'Mr. Dee Morse, NPS'	
	Koerner, Jeff	Read: 10/30/2007 12:19 PM
	Adams, Patty	Read: 10/29/2007 4:23 PM
	Gibson, Victoria	Read: 10/29/2007 4:08 PM

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 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,

DEP, Bureau of Air Regulation

11/1/2007



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

October 26, 2007

Sent Electronically – Received Receipt Requested

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

RE: Modification to the Nos. 4 Combination Boiler and Recovery Boiler
Request for Additional Time to Respond to an Incompleteness Letter
Project No. **1070005-045-AC/PSD-FL-393**

Dear Mr. Wahoske:

On June 29, 2007, the Department issued an incompleteness letter regarding a modification request for the No. 4 combination boiler. We received your letter on October 26th that requested an additional 14-days or until November 10th to respond to the incompleteness letter. The request is acceptable and the additional time is granted to include November 10th for responding to our letter of June 29th.

If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,

A handwritten signature in black ink that reads "Jeffery F. Koerner".

Jeffery F. Koerner, P.E.
Permitting North Administrator
Bureau of Air Regulation

JFK/bm

cc: Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC (keith.wahoske@gapac.com)
Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC (michael.curtis@gapac.com)
Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
Mr. David Buff, P.E., Golder Associates, Inc. (dbuff@golder.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)
Mr. Jim Little, U.S. EPA, Region 4 (little.james@epamail.epa.gov)
Mr. Dee Morse, National Park Service (Dee_Morse@nps.gov)

Harvey, Mary

From: Aguilar, Mark J. [MJAGUILA@GAPAC.com]
To: Harvey, Mary
Sent: Monday, October 29, 2007 5:11 PM
Subject: Read: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Your message

To: MJAGUILA@GAPAC.com
Subject:

was read on 10/29/2007 5:11 PM.

Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
To: undisclosed-recipients
Sent: Monday, October 29, 2007 4:32 PM
Subject: Read: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Your message

To: DBuff@GOLDER.com
Subject:

was read on 10/29/2007 4:32 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, October 30, 2007 9:22 AM
To: Harvey, Mary
Subject: Re: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

10/29/2007 03:41
PM

To

"Mr. Keith Wahoske,
Georgia-Pacific Consumer
Operations LLC"
<keith.wahoske@gapac.com>, "Mr.
Mike Curtis, Georgia-Pacific
Consumer Operations LLC"
<michael.curtis@gapac.com>, "Mr.
Mark Aguilar, P.E.,
Georgia-Pacific Consumer
Operations LLC"
<MJAGUILA@GAPAC.com>, "Mr. David
Buff, Golder Associates"
<dbuff@golder.com>, "Kirts,
Christopher"
<Christopher.Kirts@dep.state.fl.us>, Kathleen
Forney/R4/USEPA/US@EPA, James
Little/R4/USEPA/US@EPA, "Mr. Dee
Morse, NPS" <dee_morse@nps.gov>

cc

"Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>

Subject

Letter - Mr. Keith Wahoske -
Georgia-Pacific Consumer
Operations LLC

Dear Sir/Madam:

Harvey, Mary

From: Kirts, Christopher
To: Harvey, Mary
Sent: Tuesday, October 30, 2007 10:36 AM
Subject: Read: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Your message

To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, NPS'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC
Sent: 10/29/2007 3:41 PM

was read on 10/30/2007 10:36 AM.

Harvey, Mary

From: Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]
To: Harvey, Mary
Sent: Thursday, November 01, 2007 4:54 PM
Subject: Read: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Your message

To: MICHAEL.CURTIS@GAPAC.com
Subject:

was read on 11/1/2007 4:54 PM.

Harvey, Mary

From: Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]
Sent: Thursday, November 01, 2007 4:55 PM
To: Harvey, Mary
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Sorry I was late; I just sent the formal response.

Keith

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

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, November 01, 2007 4:33 PM
To: Wahoske, Keith; Curtis, Michael; Mr. Dee Morse, NPS
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

On Monday, October 29th a Modification Letter was email to you. Please email me back if you have received this letter. I need the read receipt to complete the files.

Thanks,
 Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Monday, October 29, 2007 3:41 PM
To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, NPS'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

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 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:

Harvey, Mary

From: Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]
Sent: Thursday, November 01, 2007 4:54 PM
To: Harvey, Mary
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Dear Ms. Harvey

I am in receipt of your Email.

Thank you

Keith Wahoske

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

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, October 29, 2007 3:41 PM
To: Wahoske, Keith; Curtis, Michael; Aguilar, Mark J.; Mr. David Buff, Golder Associates; Kirts, Christopher; Ms. Kathleen Forney, EPA Region 4; Mr. Jim Little, EPA Region 4; Mr. Dee Morse, NPS
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

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 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,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

11/2/2007

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Thursday, November 01, 2007 5:03 PM
To: Harvey, Mary
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

letter was received

```
|----->
|           |           "Harvey, Mary" |
|           |           <Mary.Harvey@dep.s |
|           |           tate.fl.us>      |
|           |           |
|           |           11/01/2007 04:33 |
|           |           PM AST           |
|----->
```

```
>-----|
|
|           |           To:           "Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC"
|           |           <keith.wahoske@gapac.com>, "Mr. Mike Curtis, |
|           |           Georgia-Pacific Consumer Operations LLC" <michael.curtis@gapac.com>, "Mr. Dee
|           |           Morse, NPS" <dee_morse@nps.gov>           |
|           |           cc:
|           |
|           |           Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations
|           |           LLC
|----->
```

On Monday, October 29th a Modification Letter was email to you. Please email me back if you have received this letter. I need the read receipt to complete the files.

Thanks,
Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Monday, October 29, 2007 3:41 PM
To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, NPS'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Thursday, November 01, 2007 5:02 PM
To: Harvey, Mary
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

Return Receipt

Your document: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

was received by: Dee Morse/DENVER/NPS

at: 11/01/2007 03:01:53 PM

Harvey, Mary

From: Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]
Sent: Thursday, November 01, 2007 5:04 PM
To: Harvey, Mary; Wahoske, Keith; Mr. Dee Morse, NPS
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

We did receive your letter. Thank you for your prompt attention to the request.

Mike Curtis
 Environmental Superintendent
 Palatka Mill Environmental Division
 (386)-329-0918

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

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, November 01, 2007 4:33 PM
To: Wahoske, Keith; Curtis, Michael; Mr. Dee Morse, NPS
Subject: RE: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

On Monday, October 29th a Modification Letter was email to you. Please email me back if you have received this letter. I need the read receipt to complete the files.

Thanks,
 Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Monday, October 29, 2007 3:41 PM
To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, NPS'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Keith Wahoske - Georgia-Pacific Consumer Operations LLC

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 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.



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.

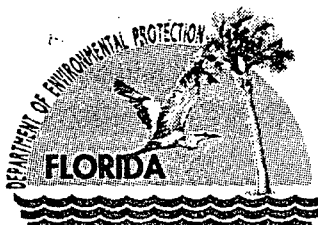
Sincerely,

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

"More Protection, Less Process"



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

April 30, 2006

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

Re: GP Air Construction Permit Project No.: 1070005-35-AC/PSD-FL-367
Recovery Boiler Modification

Dear Mr. Kennedy:

I am in receipt of your correspondence dated April 20, 2006, regarding the above referenced project. Several aspects of your correspondence warrant clarification. I am hopeful that this clarification will allow a productive teleconference with you and your staff tomorrow, Monday May 1, 2006, at 9:30.

First and foremost, the Department has acted in good faith and as expeditiously as possible to reach resolution on this project. Since the receipt of the Recovery Boiler application in November, Georgia-Pacific ("GP") has changed its project priorities on several occasions and redirected the Department's efforts on its various pending projects. For example, on February 14, 2006, the Department received an email from you indicating that the #4 lime kiln project needed to be prioritized due to a crack that developed. Then on March 2, 2006, GP requested a short-term SO₂ emission limit as part of the Recovery Boiler project which required additional modeling. For approximately 3 weeks, the Department worked with GP's modelers trying to resolve this SO₂ issue. During this delay, the Department continued its efforts on the technical evaluation and draft permit language. Suddenly, on March 20, 2006, GP rescinded its request for a short-term SO₂ limit and also requested the Department stop working on the #4 lime kiln shell project. The Department's staff worked on the Recovery Boiler project during its family vacation time in order to issue a draft PSD permit to GP a mere 10 days later (March 30, 2006).

Based upon a teleconference on April 13, 2006, the Department understands that GP did not obtain the funding for the Recovery Boiler project for this year. The Department remains hopeful, however, that the fruits of

"More Protection, Less Process"

Printed on recycled paper.

everyone's efforts on this project will result in a final PSD permit. To that end, your letter raised questions regarding the Department's authority for several permit conditions contained in the draft PSD permit. The following information explains the basis for the Department's authority. I would be happy to discuss this with you in more detail on the teleconference tomorrow morning or at your convenience.

As you are aware, the primary purpose of this project is to completely refurbish the recovery boiler (as evidenced by the \$34 million projected costs) and to increase the solids content of the primary fuel of black liquor solids (BLS). As described in the application, increasing the solids content is predicted to result in high flue gas volumes and increased mass emission rates, particularly NOx emissions. Based on GP's PSD netting analysis, the project could result in the following significant net emissions increases:

Pollutant	Net Emissions Increase	PSD Significant Emission Rates
PM	333	25
PM ₁₀	274	15
NO _x	744	40
CO	1,623	100
SAM	26	7
VOC	389	40

These are the potential emissions increases predicted after taking credit for any contemporaneous emissions reductions. Due to the significant potential emissions increase, the project is subject to prevention of significant deterioration ("PSD") preconstruction review for each of these pollutants. As part of the PSD program, the Department is required to perform a case-by-case best available control technology ("BACT") determination. As described in the Technical Evaluation and Preliminary Determination, Rule 62-210.200(38), F.A.C. defines BACT as follows:

- (a) An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted, **which the Department**, on a case by case basis, taking into account:
 1. Energy, environmental and economic impacts, and other costs;
 2. All scientific, engineering, and technical material and other information available to the Department; and
 3. The emission limiting standards or BACT determinations of Florida and any other state;

determines is achievable through application of production processes and available methods, systems and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant.

- (b) If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.
- (c) Each BACT determination shall include applicable test methods or **shall provide for determining compliance with the standard(s)** by means which achieve equivalent results.
- (d) In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR Parts 60, 61, and 63. (emphasis added)

In addition, Rule 62-4.070, F.A.C. requires that the Department have reasonable assurances that a proposed project will comply with all applicable Department rules. This rule allows the Department to establish permit conditions that afford it reasonable assurances of compliance. These rules are the core of the Department's authority for the PSD emission limitations and continuous emission monitoring requirements established in the PSD permit.

I hope this information is helpful and look forward to discussing this project with you tomorrow or at your earliest convenience.

Sincerely,



Trina L. Vielhauer
Chief,
Bureau of Air Regulation

cc: Myra Carpenter, Ed Jamro, GP
Jeff Koerner, Bruce Mitchell, BAR
Pat Comer, DEP-OGC



Palatka Pulp and Paper Operations
Consumer Products Division

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

RECEIVED

SEP 26 2007

BUREAU OF AIR REGULATION

September 25, 2007

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

find file

**Re: Project No. 1070005-045-AC/PSD-FL-393
Modification of the Nos. 4 Combination Boiler and Recovery Boiler
Request for Additional Information Letter No. 1
Request for 30 day extension**

Dear Mr. Koerner:

We are in receipt of your request for additional information (RAI), dated June 29 2007, regarding the subject PSD permit application project.

Georgia-Pacific requests an additional 30 days, or until October 27th, to respond to the RAI.

If there are any questions regarding this response, please do not hesitate to contact Mike Curtis at 386-329-0918.

Sincerely,

for kww

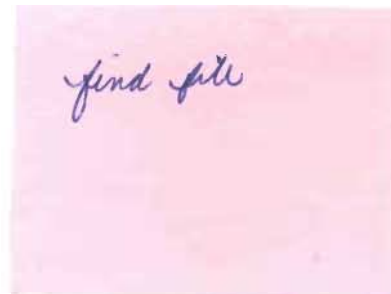
Keith W. Wahoske, Vice-President
Palatka Operations

Cc: W. Galler, T. Champion, T. Wyles, S. Matchett, R. Reynolds, M. Curtis - GP

Harvey, Mary

From: Harvey, Mary
Sent: Thursday, September 27, 2007 3:40 PM
To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'little.james@epamail.epa.gov'; 'Mr. Dee Morse, National Park Service'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393
Attachments: Letter-Keith Wahoske - Georgia-Pacific Consumer Operations - Project #1070005-045.pdf

Tracking:	Recipient	Read
<input checked="" type="checkbox"/>	'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'	
<input checked="" type="checkbox"/>	'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'	
<input checked="" type="checkbox"/>	'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'	
<input checked="" type="checkbox"/>	'Mr. David Buff, Golder Associates'	
<input checked="" type="checkbox"/>	Kirts, Christopher	Read: 9/28/2007 8:06 AM
<input checked="" type="checkbox"/>	'Ms. Kathleen Forney, EPA Region 4'	
<input checked="" type="checkbox"/>	'little.james@epamail.epa.gov'	
<input checked="" type="checkbox"/>	'Mr. Dee Morse, National Park Service'	
	Koerner, Jeff	
<input checked="" type="checkbox"/>	Adams, Patty	Read: 9/27/2007 4:02 PM
<input checked="" type="checkbox"/>	Gibson, Victoria	Read: 9/27/2007 3:43 PM



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 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,

DEP, Bureau of Air Regulation

10/2/2007

Harvey, Mary

From: Wahoske, Keith [KEITH.WAHOSKE@GAPAC.com]
To: Harvey, Mary
Sent: Thursday, September 27, 2007 3:53 PM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: KEITH.WAHOSKE@GAPAC.com
Subject:

was read on 9/27/2007 3:53 PM.

Harvey, Mary

From: Aguilar, Mark J. [MJAGUILA@GAPAC.com]
To: Harvey, Mary
Sent: Tuesday, October 02, 2007 4:12 PM
Subject: Read: FW: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: MJAGUILA@GAPAC.com
Subject:

was read on 10/2/2007 4:12 PM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Thursday, September 27, 2007 4:02 PM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'little.james@epamail.epa.gov'; 'Mr. Dee Morse, National Park Service'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393
Sent: 9/27/2007 3:40 PM

was read on 9/27/2007 4:02 PM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Thursday, September 27, 2007 3:43 PM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'little.james@epamail.epa.gov'; 'Mr. Dee Morse, National Park Service'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393
Sent: 9/27/2007 3:40 PM

was read on 9/27/2007 3:43 PM.

Harvey, Mary

From: Kirts, Christopher
To: Harvey, Mary
Sent: Friday, September 28, 2007 8:06 AM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: 'Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC'; 'Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC'; 'Mr. David Buff, Golder Associates'; Kirts, Christopher; 'Ms. Kathleen Forney, EPA Region 4'; 'little.james@epamail.epa.gov'; 'Mr. Dee Morse, National Park Service'
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393
Sent: 9/27/2007 3:40 PM

was read on 9/28/2007 8:06 AM.

Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
To: undisclosed-recipients
Sent: Thursday, September 27, 2007 10:46 PM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: DBuff@GOLDER.com
Subject:

was read on 9/27/2007 10:46 PM.

Harvey, Mary

From: Curtis, Michael [MICHAEL.CURTIS@GAPAC.com]
To: Harvey, Mary
Sent: Thursday, September 27, 2007 4:31 PM
Subject: Read: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Your message

To: MICHAEL.CURTIS@GAPAC.com
Subject:

was read on 9/27/2007 4:31 PM.

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Thursday, September 27, 2007 4:11 PM
To: Harvey, Mary
Subject: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Return Receipt

Your Letter - Keith Wahoske - Georgia-Pacific Consumer Operations
document: LLC - Project No. 1070005-045-AC/PSD-FL-393

was Dee Morse/DENVER/NPS
received
by:

at: 09/27/2007 02:10:25 PM

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Monday, October 01, 2007 10:08 AM
To: Harvey, Mary
Subject: Re: Letter - Keith Wahoske - Georgia-Pacific Consumer Operations LLC - Project No. 1070005-045-AC/PSD-FL-393

Got it.
Thanks.

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

09/27/2007 03:39
PM

To

"Mr. Keith Wahoske,
Georgia-Pacific Consumer
Operations LLC"
<keith.wahoske@gapac.com>, "Mr.
Mike Curtis, Georgia-Pacific
Consumer Operations LLC"
<michael.curtis@gapac.com>, "Mr.
Mark Aguilar, P.E.,
Georgia-Pacific Consumer
Operations LLC"
<MJAGUILA@GAPAC.com>, "Mr. David
Buff, Golder Associates"
<dbuff@golder.com>, "Kirts,
Christopher"
<Christopher.Kirts@dep.state.fl.us>, Kathleen
Forney/R4/USEPA/US@EPA, James
Little/R4/USEPA/US@EPA, "Mr. Dee
Morse, National Park Service"
<Dee_Morse@nps.gov>

cc

"Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>

Subject

Letter - Keith Wahoske -
Georgia-Pacific Consumer
Operations LLC - Project No.
1070005-045-AC/PSD-FL-393



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

September 27, 2007

Sent Electronically – Received Receipt Requested

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

RE: Modification to the Nos. 4 Combination Boiler and Recovery Boiler
Request for Additional Time to Respond to an Incompleteness Letter
Project No. 1070005-045-AC/PSD-FL-393

Dear Mr. Wahoske:

On June 29, 2007, the Department issued an incompleteness letter regarding a modification request for the No. 4 combination boiler. We received your letter on September 26th that requested an additional 30-days or until October 27th to respond to the incompleteness letter. The request is acceptable and the additional time is granted to include October 27th for responding to our letter of June 29th.

If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,

Jeffery F. Koerner, P.E.
Permitting North Administrator
Bureau of Air Regulation

JFK/bm

cc: Mr. Keith Wahoske, Georgia-Pacific Consumer Operations LLC (keith.wahoske@gapac.com)
Mr. Mike Curtis, Georgia-Pacific Consumer Operations LLC (michael.curtis@gapac.com)
Mr. Mark Aguilar, P.E., Georgia-Pacific Consumer Operations LLC (mjaguila@gapac.com)
Mr. David Buff, P.E., Golder Associates, Inc. (dbuff@golder.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)
Mr. Jim Little, U.S. EPA, Region 4 (little.james@epamail.epa.gov)
Mr. Dee Morse, National Park Service (Dee_Morse@nps.gov)



Palatka Pulp and Paper Operations
Consumer Products Division

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

RECEIVED

SEP 26 2007

BUREAU OF AIR REGULATION

September 25, 2007

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: Project No. 1070005-045-AC/PSD-FL-393
Modification of the Nos. 4 Combination Boiler and Recovery Boiler
Request for Additional Information Letter No. 1
Request for 30 day extension**

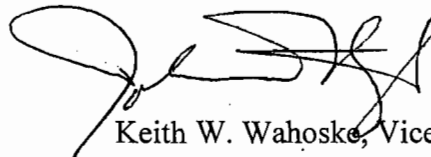
Dear Mr. Koerner:

We are in receipt of your request for additional information (RAI), dated June 29 2007, regarding the subject PSD permit application project.

Georgia-Pacific requests an additional 30 days, or until October 27th, to respond to the RAI.

If there are any questions regarding this response, please do not hesitate to contact Mike Curtis at 386-329-0918.

Sincerely,

 For Kww
Keith W. Wahoske, Vice-President
Palatka Operations

Cc: W. Galler, T. Champion, T. Wyles, S. Matchett, R. Reynolds, M. Curtis - GP

Incompleteness
Request. Bruce

Mitchell, Bruce

From: Mitchell, Bruce
Sent: Thursday, December 13, 2007 4:10 PM
To: 'Curtis, Michael'
Subject: Performance data.

12/13/07

Good afternoon, Mike,

On November 16, 2006, we received a RAI response. In response #7, you provided some pollutant (CO, NOx, SO₂ and VOC) test values for similar boilers located at G-P mills in Camas, Washington and Monticello, Mississippi. Assuming that these pollutant values are the results of averaging, please provide each of the actual pollutant test values that were used. In addition, there were no test values provided for particulate matter. If available, please provide the last 7 years of test data for particulate matter. Also, provide the current emission standards for each pollutant. Finally, for each boiler and control system, please provide their bio - date built, maximum heat input rate(s) per fuel, actual and standard flow rates, number of fields in the ESP, ESP type (dry or wet) - and any other information to assess similarity between them and the No. 4 combination boiler (CB).

Regarding the periodic destruction of SOGs in the No. 4 CB, is it possible to pre-scrub these gases prior to routing them to the boiler, as are done with the NCGs?

Thanks for looking into this request and look forward to hearing from you. I left you a message earlier with Tracey Kelley that I had called. Take care.

Bruce
850/413-9198

12/24/2007

Adams, Patty

From: Friday, Barbara
Sent: Thursday, December 20, 2007 7:28 AM
To: Adams, Patty
Subject: FW: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

From: Wahoske, Keith [mailto:KEITH.WAHOSKE@GAPAC.com]
Sent: Wednesday, December 19, 2007 4:05 PM
To: Friday, Barbara; Curtis, Michael; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Harvey, Mary
Subject: RE: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

We are in receipt of your Email.

Thank you

Keith

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

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Wednesday, December 19, 2007 9:41 AM
To: Wahoske, Keith; Curtis, Michael; Kirts, Christopher
Cc: Koerner, Jeff; Adams, Patty; Harvey, Mary
Subject: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

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 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,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

12/20/2007



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

July 30, 2007

Electronically Sent – Received Receipt Requested

Mr. George Q. Langstaff
V.P. - Regional Mill Operations
Smurfit-Stone Container Enterprises, Inc.
Fernandina Beach Mill
North 8th Street
Fernandina Beach, Florida 32034

RE: BART Application for the No. 4 Recovery Boiler, No. 4 Smelt Dissolving Tank and No. 5 Power Boiler
0890003-018-AC


Dear Mr. Langstaff:

On July 9, 2007, the Department received a response to an incompleteness letter regarding the BART application for the No. 4 Recovery Boiler, No. 4 Smelt Dissolving Tank and No. 6 Power Boiler received February 2, 2007. Based on a review of the recent 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. For Table 1 in the response, please complete the calculations and provide the cost effectiveness of the "\$ per ton of SO₂ removed" when firing 0.5% sulfur content, by weight, residual fuel oil in the No. 5 Power Boiler. In addition, list the components that would have to be changed/retrofitted to accommodate these different fuels and include the costs for these components.

In a recent response from a similar facility regarding the switching to a 0.50%, by weight, sulfur content No. 5 fuel oil from No. 6 fuel oil, it appears that it handles similar to No. 6 fuel oil and that the only additional cost would be the net incremental cost between the two fuels. This conclusion is in contradiction of your statement made in the first sentence at the beginning of section 5.1.6 of the original application

It is requested that you please respond within 30-days of receipt of this letter in order for us to issue the BART permit for the affected emission units by December 2007 and meet our SIP submittal needs. 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 me at (850)921-9536.

Sincerely,

for Jeffrey Koerner, P.E.
Administrator – Permitting North
Bureau of Air Regulation

JFK/bm

cc: George Q. Langstaff, V.P. – Regional Mill Operations and R.O., SSCEI (glangstaff@smurfit.com)
Chris Kirts, DEP – NED (chris.kirts@dep.state.fl.us)
David A. Buff, P.E., GAI (dbuff@golder.com)
Bill Crews, Application Contact, SSCEI (bcrews@smurfit.com)

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



January 16, 2002

0037602

RECEIVED

JAN 17 2002

BUREAU OF AIR REGULATION

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attention: Mr. A.A. Linero, P.E., Administrator

RE: AIRS ID NO. 1070005
GEORGIA-PACIFIC CORPORATION, PALATKA MILL
MACT I COMPLIANCE POLLUTION CONTROL PROJECT

Dear Mr. Linero:

This letter is being provided to the Florida Department of Environmental Protection (FDEP) to summarize the air modeling results of the Prevention of Significant Deterioration (PSD) Class I analysis for sulfur dioxide (SO₂) that was performed on the Okefenokee National Wilderness Area (NWA) PSD Class I area. The analysis was performed on behalf of Georgia-Pacific Corporation (GP). These results, together with the ambient air quality standard (AAQS) and PSD Class II analyses results provided to FDEP on January 14, 2002, complete the demonstration of air quality compliance that was requested by FDEP.

The PSD Class I air modeling analysis was necessary because the proposed project's maximum 3-hour SO₂ impact exceeded the PSD Class I significant impact level of 1 microgram per cubic meter (µg/m³) for the case of the No. 4 Combination Boiler operating as the NCG/SOG destruction device. Therefore, a 3-hour cumulative PSD Class I analysis was performed at the Okefenokee NWA for this case.

The cumulative impact analysis included SO₂ background facilities and sources, as provided by FDEP. A summary of these sources was presented in Tables 3, 4, and 5 in the January 14, 2002 letter.

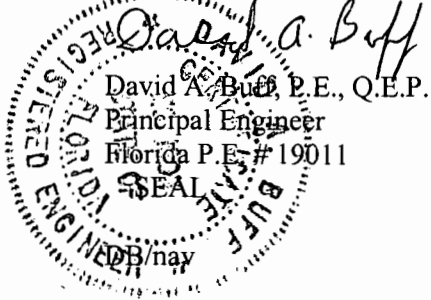
As shown in Table 10 of the January 14 submittal, the proposed GP project was significant at the Okefenokee Class I area on Day 337 in 1990 (3-hour period ending 1100). The modeling showed that this was the only 3-hour period for which the project was significant at any Okefenokee Class I receptor. Further, the project was significant only at 12 receptors of the total 161 receptors that were included in the modeling analysis.

The results of the cumulative PSD Class I air modeling analysis are summarized in Table 11 (attached). As shown, none of the PSD Class I exceedances predicted at these 12 receptors occurs on Day 337 of 1990. It can be concluded, therefore, that the proposed GP project will not cause or contribute to any predicted PSD Class I violations.

All of the remaining air modeling files have been electronically transferred to Cleve Holladay along with an updated readme.doc file. Please call me or Steve Marks if you have any questions at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



Enclosures

cc: M. Carpenter
T. Kennedy
J. Taylor
M. Aguilar
C. Kirts
S. Watson
S. Marks

P:\Projects\2001\0137602 JEA\MM_IL\011602.doc

C. Holladay
B. Mitchell

Table 11. Summary of 3-Hour PSD Class I Exceedances^a at the Receptors for Which the Proposed Project is Significant, Okefenokee NWA

CALPOST Receptor Number	Receptor Location ^b		Year 1990 Exceedance Time Periods (Julian Day/Hour Ending)			
	X (km)	Y (km)				
37	389.2	3381.7	016/1700	355/1100	123/1100	089/1100
38	387.7	3382.1	016/1700	123/1100	089/1100	073/1100
39	387.5	3380.7	016/1700	123/1100	089/1100	073/1100
40	386.0	3381.1	016/1700	123/1100	073/1100	089/1100
41	385.7	3379.7	123/1100	073/1100	016/1700	089/1100
42	384.4	3380.0	123/1100	016/1700	073/1100	089/1100
43	384.8	3381.4	016/1700	123/1100	073/1100	089/1100
44	383.5	3381.7	016/1700	123/1100	073/1100	089/1100
45	383.4	3382.2	016/1700	123/1100	073/1100	089/1100
46	381.3	3382.4	123/1100	073/1100	--	--
47	378.5	3382.7	073/1100	123/1100	--	--
48	376.5	3382.8	073/1100	123/1100	--	--

Note: Proposed project was significant only on Julian Day 337, Hour Ending 1100.

^a Allowable PSD Class I Increment is 25 µg/m³.

^b UTM Coordinates (km), Zone 17.

Mitchell, Bruce

From: Galler, Wayne J. [WJGALLER@GAPAC.com]
Sent: Tuesday, November 27, 2007 9:51 AM
To: Mitchell, Bruce; Koerner, Jeff
Cc: Curtis, Michael; Galler, Wayne J.; Reynolds, Ron E.
Subject: EPSAP Submittal for No. 4 Combination Boiler at Georgia-Pacific Consumer Operations LLC
Palatka, FL Mill

Jeff and Bruce-in the recently submitted EPSAP submittal referenced above, we requested that the agency process the application concurrently to incorporate the air construction permit into the Title V Permit as a permit revision. We would like to withdraw our request to the agency to perform the concurrent processing for incorporation of the construction permit for the No. 4 Combination Boiler into a revised Title V permit at this time. The agency should proceed with processing this submittal as a construction permit application only for the No. 4 Combination Boiler. Please contact Mike Curtis at (386) 329-0918 or me at the telephone number shown below if you have any further questions regarding this matter. Thanks.

Wayne J. Galler
Senior Environmental Consultant - Air
Georgia-Pacific LLC
133 Peachtree Street N.E
Atlanta, GA 30303
Telephone: 404-652-5044
Fax: 404-654-4706
E-mail: wjgaller@gapac.com

11/27/2007

Adams, Patty

From: Friday, Barbara
Sent: Thursday, December 20, 2007 7:29 AM
To: Adams, Patty
Subject: FW: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

From: Curtis, Michael [<mailto:MICHAEL.CURTIS@GAPAC.com>]
Sent: Wednesday, December 19, 2007 4:44 PM
To: Friday, Barbara
Subject: Read: DRAFT Air Construction Permit No. 1070005-050-AC - Georgia-Pacific Palatka Mill

Your message

To: MICHAEL.CURTIS@GAPAC.com
Subject:

was read on 12/19/2007 4:44 PM.

Georgia-Pacific -- Palatka Operations 1070005-035-AC
 OGC # 06-0921 (Bruce)

2006								
11-Apr	Received notification from OGC that facility had requested first extension							
12-Apr	copies to all		updated book, list and notes					
			under review					
19-Apr	Bruce spoke to Pat and approved the order to grant sometime around this date							
24-Apr	Order to grant issued by Pat todayrec'd our copy							
	copies to Bruce, Patty and Trina							
25-Apr	update book, list, notes and Outlook							
	Expires on May 11th							
4-May	one week notice to Bruce							
11-May	OGC received in another request for extension of time							
	notified Bruce							
16-May	OGC issued the order to grant through June 12th							
	copies to Bruce, Jeff and Trina				and a copy to Patty			
	Updated the book, list, notes and Outlook							
19-May	note to Valerie for a copy of the request for extension of time							
	rec'd that copy today by fax							
	gave a copy to Bruce and Patty							
6-Jun	one week notice to Bruce and Jeff							
	Expires on June 12th							

2006

9-Jun OGC rec'd 3rd request for an extension of timee-mailed us our copy copy to Bruce and Trina

13-Jun note to Bruce and Jeff to see if we are going to grant this or hold off

14-Jun forwarded same note as above to Trina

16-Jun Trina, Bruce and Jeff had a meeting with Ga-Pacific today

19-Jun discussed with Trina what we should do with their request through July 12th she said to grant but add the sentence that they were considering withdrawing their application and then resubmitting it at a later time e-mail to Valerie in OGC with this information

19-Jun OGC issued the order to grant todayrec'd our copy copies to Trina and Bruce with an e-mail update only to Jeff updated book, list, notes and Outlook they did not add Trina's note as she had requested sent an e-mail to Trina to let her know with a copy of what I had sent over to Valerie in OGC earlier today

6-Jul one week notice

10-Jul per Bruce, facility will withdraw application very soon and then resubmit

Expires on July 12th

13-Jul Received official withdrawal request from the facility today scanned and e-mailed a copy to Lea Crandall in OGC

14-Jul Case Closed in OGC today

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, July 14, 2006 11:37 AM
To: Mitchell, Bruce; Koerner, Jeff
Subject: FW: GP 06-0921

FYI,

Vickie

From: Miskelley, Valerie
Sent: Friday, July 14, 2006 11:27 AM
To: Gibson, Victoria
Subject: GP 06-0921

Vickie-

Just wanted to let you know we got the signed letter for OGC Case # 06-0921 and I have just closed the case in LCT. Let me know if you need anything else.

Thanks,
Valerie Miskelley
Administrative Secretary
FDEP Office of General Counsel
3900 Commonwealth Blvd. MS 35
Tallahassee, FL 32399-3000
(850) 245-2260 SC 205-2260
Fax: (850) 245-2302
Valerie.Miskelley@dep.state.fl.us

Gibson, Victoria

From: Crandall, Lea
Sent: Thursday, July 13, 2006 1:36 PM
To: Gibson, Victoria
Subject: RE: Georgia-Pacific - Palatka Mill 1070005-035-AC

Yes, I got it, thanks!

Lea Crandall

Agency Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212 SC: 205-2212
Fax: (850) 245-2303

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

From: Gibson, Victoria
Sent: Thursday, July 13, 2006 1:36 PM
To: Crandall, Lea
Subject: RE: Georgia-Pacific - Palatka Mill 1070005-035-AC

I scanned the document and sent it to you by e-mail.....is it readable?

Vickie

From: Crandall, Lea
Sent: Thursday, July 13, 2006 1:19 PM
To: Gibson, Victoria; Miskelley, Valerie
Subject: RE: Georgia-Pacific - Palatka Mill 1070005-035-AC

Yes, please. I just need to enter it in LCT, then I can pass it on to Pat.

Thanks,
Lea

Lea Crandall

Agency Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212 SC: 205-2212
Fax: (850) 245-2303

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

From: Gibson, Victoria
Sent: Thursday, July 13, 2006 1:17 PM
To: Crandall, Lea; Miskelley, Valerie
Subject: Georgia-Pacific - Palatka Mill 1070005-035-AC

Hi,

I have received a letter stating that of several permit applications; they are withdrawing the above that applies to OGC # 06-0921.

Would you both like a copy of this?

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533



Palatka Pulp and Paper Operations
Consumer Products Division

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

July 11, 2006

RECEIVED

JUL 13 2006

BUREAU OF AIR REGULATION

Ms. Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Division of Air Resource Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Georgia-Pacific Palatka Mill - PSD Permit Applications – Withdrawal Request
Lime Kiln (LK) Shell Project No.: 1070005-030-AC/PSD-FL-345
#4 Combination Boiler (CB) Project No.: 1070005-003-AC/PSD-FL-357
#4 Recovery Boiler (RB) Project No.: 1070005-035-AC/PSD-FL-367

Dear Ms. Vielhauer:

With this letter Georgia-Pacific respectfully withdraws the above referenced PSD Permit Applications previously sent to the Department. As GP and DEP have discussed recently, it is our intent to prepare the RB and LK Shell as one new application and submit it and a revised #4CB PSD Application in one package in the very near future. In discussions with your staff, it is our understanding that DEP will process the applications concurrently and issue one overall permit.

If you have any questions please call Myra Carpenter at (386) 329-0918.

Sincerely,

Theodore D. Kennedy
Vice President

cc: M.J. Carpenter, T. Champion, S.D. Matchett, T. Wyles, E. Jamro
Mr. D. Buff – Golder Asso.

cc: [faded handwritten text]

cc: Lea Caudill, DEC 27-11-06 - vt

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**GEORGIA-PACIFIC CORPORATION,
PALATKA OPERATIONS,**

Petitioner,

v.

OGC No. 06-0921 0
DEP Permit No. 107005-035-AC 1

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER GRANTING THIRD REQUEST FOR
EXTENSION OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (FDEP) upon receipt of a request made by Petitioner, Georgia-Pacific Corporation, to grant a third extension of time to file a petition for an administrative hearing to allow time to discuss with FDEP several specific permit conditions for its facility in Palatka, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **July 12, 2006**, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 19th day of June, 2006, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



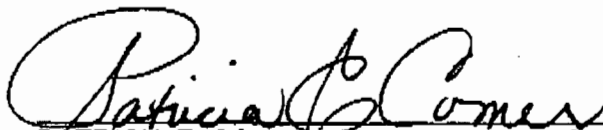
JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850/245-2242 facsimile 850/245-2302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail this 19th day of June, 2006, to:

Terry Cole
Oertel, Fernandez, Cole & Bryant P.A.
Post Office Box 1110
Tallahassee, Florida 32302

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



PATRICIA E. COMER, Assistant General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850/245-2288 facsimile 850/245-2302

with a courtesy copy via facsimile to:

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resource Management

facsimile: 850/921-9533

Gibson, Victoria

From: Gibson, Victoria
Sent: Monday, June 19, 2006 3:12 PM
To: Vielhauer, Trina
Subject: FW: Georgia Pacific PSD

Here's what I e-mailed to Valerie earlier today.

Vickie

From: Gibson, Victoria
Sent: Monday, June 19, 2006 10:04 AM
To: Miskelley, Valerie
Subject: RE: Georgia Pacific PSD

I was just getting ready to send you a note on this one....so thanks for asking.....Trina, Jeff and Bruce just met with Georgia Pacific on Friday afternoon.

Per Trina and Jeff it is okay to grant their extension request. However, Trina and Jeff would like to have the following sentence worked into this order to grant:

(Georgia - Pacific is deciding whether to pull and re-submit this permit at a later date.)

Thank you.

Vickie

From: Miskelley, Valerie
Sent: Monday, June 19, 2006 9:58 AM
To: Gibson, Victoria
Subject: RE: Georgia Pacific PSD

Vickie,
Have you heard anything back from Bruce or Jeff on this extension??

Thanks,
Valerie

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

From: Gibson, Victoria
Sent: Tuesday, June 13, 2006 3:08 PM
To: Mitchell, Bruce; Koerner, Jeff
Cc: Miskelley, Valerie
Subject: FW: Georgia Pacific PSD

Bruce,

Are we planning on granting the extension of time requested on 1070005-035-AC through and including July 12th or are we putting the request on hold for a while?

Vickie

From: Miskelley, Valerie
Sent: Monday, June 12, 2006 1:07 PM
To: Gibson, Victoria
Subject: Georgia Pacific PSD

We got the ok to grant the extension on the Title V permit from the district...is the division planning on granting the third extension on the PSD permit? I am drafting the Title V order now and will do the PSD if we get the ok.

Thanks,
Valerie

Gibson, Victoria

From: Gibson, Victoria
Sent: Monday, June 19, 2006 3:11 PM
To: Vielhauer, Trina
Subject: Ga-Pacific 1070005-035-AC

FYI,

The order granting an extension of time was issued today on this; without your comment being included. They used the usual language of: "allow time to discuss with FDEP several specific permit conditions for its facility in Palatka". I had highlighted your request in red so that they couldn't miss it.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Koerner, Jeff
Sent: Monday, June 19, 2006 9:33 AM
To: Gibson, Victoria; Mitchell, Bruce
Cc: Vielhauer, Trina
Subject: RE: Ga-Pac 1070005-035-AC

No, OK with me ...

Jeff

From: Gibson, Victoria
Sent: Monday, June 19, 2006 9:19 AM
To: Koerner, Jeff; Mitchell, Bruce
Cc: Vielhauer, Trina
Subject: Ga-Pac 1070005-035-AC
Importance: High

Good morning.

The facility had requested an extension of time for this permit through and including July 12th. Trina suggested that we go ahead and grant their extension request but add this statement into the order to grant: Georgia - Pacific is deciding whether to pull and re-submit this permit at a later date.

Is there any thing else that we need to consider before we contact Pat in OGC?

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Vielhauer, Trina
Sent: Wednesday, June 14, 2006 4:40 PM
To: Gibson, Victoria
Subject: RE: Georgia Pacific PSD

I think that is fine.

From: Gibson, Victoria
Sent: Wednesday, June 14, 2006 2:45 PM
To: Vielhauer, Trina
Subject: FW: Georgia Pacific PSD

FYI,

Vickie

From: Gibson, Victoria
Sent: Tuesday, June 13, 2006 3:08 PM
To: Mitchell, Bruce; Koerner, Jeff
Cc: Miskelley, Valerie
Subject: FW: Georgia Pacific PSD

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Thanks,
Valerie

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Cc: Miskelley, Valerie
Subject: FW: Georgia Pacific PSD

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Sent: Monday, June 12, 2006 1:07 PM
To: Gibson, Victoria
Subject: Georgia Pacific PSD

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Thanks,
Valerie

Gibson, Victoria

From: Miskelley, Valerie
Sent: Monday, June 12, 2006 11:57 AM
To: Kirts, Christopher; Comer, Patricia; Gibson, Victoria
Subject: Georgia Pacific

Just wanted to let you know that on Friday June 9 we received requests for time extensions in both GP cases.

Valerie Miskelley
Administrative Secretary
FDEP Office of General Counsel
3900 Commonwealth Blvd. MS 35
Tallahassee, FL 32399-3000
(850) 245-2260 SC 205-2260
Fax: (850) 245-2302
Valerie.Miskelley@dep.state.fl.us

DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF FLORIDA

GEORGIA-PACIFIC CORPORATION,
Palatka Operations,

Petitioner,

v.

GP Air Construction Permit Project No.:
1070005-035-AC/PSD-FL-367 Recovery
Boiler Modification

DEPARTMENT OF ENVIRONMENTAL
PROTECTION, STATE OF FLORIDA

Respondent.

THIRD FOR EXTENSION OF TIME

Petitioner, GEORGIA-PACIFIC CORPORATION ("GP"), pursuant to Rule 62-110.106(4), Fla. Admin. Code, hereby requests an additional thirty-day extension of time within which to file a petition seeking a formal administrative proceeding and within which to publish a Notice of Intent to Issue a construction permit in the above-styled matter concerning the agency action proposed by Respondent, the FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION. This request is in response to the letter providing notice of intent to issue a permit, dated March 30, 2006, and is timely filed. In support of this request, Petitioner states:

1. GP has a number of issues in the permit which it needs to discuss and attempt to resolve with the Department.
2. The issues of concern in the proposed permit have been provided verbally to the Department. Subsequently, a letter with the issues of concern raised by the proposed permit was provided to the Department. Follow-up discussions have also occurred.

3. Such continuing discussions are more efficient than filing a Petition for Hearing.

4. The issues with the proposed construction permit were not resolved in time for construction during the annual mill outage scheduled to begin May 7. (GP and the Department are discussing a much smaller interim maintenance project to replace a minimum number of tubes while the unit is down, which GP believes does not require permitting.) The issues involving the proposed construction permit will remain. The routine maintenance issue was resolved.

5. GP contacted the Department and was unable to reach counsel for the Department concerning an additional thirty-day extension.

WHEREFORE, Petitioner respectfully requests that the Department enter an Order allowing until July 12, 2006 to file a petition seeking a formal administrative proceeding or to publish a Notice of Intent to Issue Construction Permit in the above-styled matter. Should the Motion not be granted, GP requests that this Motion be treated as a Petition for Formal Administrative Proceedings.

Respectfully submitted this 9th day of June 2006.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct of the foregoing has been furnished via Electronic Transmission this 9th day of June 2006, to:

Pat Comer
Jack Chisholm
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Trina Vielhauer
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Terry Cole

Terry Cole
Fla. Bar No. 133550
Oertel, Fernandez, Cole & Bryant, P.A.
P.O. Box 1110
Tallahassee, Florida 32302
(850) 521-0700
(850) 521-0720 Facsimile

FATC\PLDS\1504 Georgia-Pacific\Third Motion for Extension of Time Recovery Boiler 035-AC.doc

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, June 09, 2006 11:31 AM
To: Mitchell, Bruce; Koerner, Jeff
Subject: FW: GP Filing for today
Attachments: Third Motion for Extension of Time Recovery Boiler 035-AC.pdf

FYI,

Vickie

From: Crandall, Lea
Sent: Friday, June 09, 2006 11:30 AM
To: Gibson, Victoria
Subject: FW: GP Filing for today

another one!

have a great weekend,
Lea

Lea Crandall

Agency Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212 SC: 205-2212
Fax: (850) 245-2303

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

From: Becki Frazier [mailto:bfrazier@ohfc.com]
Sent: Friday, June 09, 2006 11:15 AM
To: Crandall, Lea
Cc: Comer, Patricia; Chisolm, Jack; Vielhauer, Trina; Scott Matchett; Carpenter, Myra J.; Edward Jamro
Subject: GP Filing for today

Good morning. Please see the attached for filing today. Thanks and have a great weekend.

<<Third Motion for Extension of Time Recovery Boiler 035-AC.pdf>>

Becki Frazier
Legal Assistant to Terry Cole,
Patricia Renovitch, Scott Foltz,
and Jeffrey Brown
Oertel, Fernandez, Cole & Bryant, P.A.
301 S. Bronough St., Suite 500
P.O. Box 1110 (32302-1110)
Tallahassee, Florida 32301

6/9/2006

Phone: (850) 521-0700

Fax: (850) 521-0720

www.ohfc.com

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**GEORGIA-PACIFIC CORPORATION,
PALATKA OPERATIONS,**

Petitioner,

v.

OGC No. 06-0921 0
DEP Permit No. 107005-035-AC
1

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER GRANTING SECOND REQUEST FOR
EXTENSION OF TIME TO FILE PETITION FOR HEARING**


This cause has come before the Florida Department of Environmental Protection (FDEP) upon receipt of a request made by Petitioner, Georgia-Pacific Corporation, to grant a second extension of time to file a petition for an administrative hearing to allow time to discuss with FDEP several specific permit conditions for its facility in Palatka, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **June 12, 2006**, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 15th day of May, 2006, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



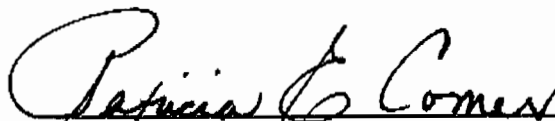
JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850/245-2242 facsimile 850/245-2302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail this 16th day of May, 2006, to:

Terry Cole
Oertel, Fernandez, Cole & Bryant P.A.
Post Office Box 1110
Tallahassee, Florida 32302

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



PATRICIA E. COMER, Assistant General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850/245-2288 facsimile 850/245-2302

with a courtesy copy via facsimile to:

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resource Management

facsimile: 850/921-9533

Gibson, Victoria

From: Miskelley, Valerie
Sent: Friday, May 19, 2006 12:11 PM
To: Gibson, Victoria
Subject: RE: Copy of an Extension Request

just sent it...have a great weekend!!

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

From: Gibson, Victoria
Sent: Friday, May 19, 2006 12:05 PM
To: Miskelley, Valerie
Subject: Copy of an Extension Request

Hi,

Happy Friday!!

There is no rush on this request...today or Monday is fine.

May I have a copy of the extension request from:

Georgia - Pacific Corp. / Palatka Operations
1070005-035-AC

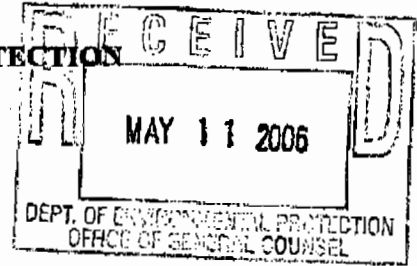
I have a copy of the order granting their request.

Thank you.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

**DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF FLORIDA**



GEORGIA-PACIFIC CORPORATION,
Palatka Operations,

Petitioner,

v.

**GP Air Construction Permit Project No.:
1070005-035-AC/PSD-FL-367 Recovery
Boiler Modification**

DEPARTMENT OF ENVIRONMENTAL
PROTECTION, STATE OF FLORIDA

Respondent.

SECOND FOR EXTENSION OF TIME

Petitioner, GEORGIA-PACIFIC CORPORATION ("GP"), pursuant to Rule 62-110.106(4), Fla. Admin. Code, hereby requests an additional thirty-day extension of time within which to file a petition seeking a formal administrative proceeding and within which to publish a Notice of Intent to Issue a construction permit in the above-styled matter concerning the agency action proposed by Respondent, the FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION. This request is in response to the letter providing notice of intent to issue a permit, dated March 30, 2006, and is timely filed. In support of this request, Petitioner states:

1. GP has a number of issues in the permit which it needs to discuss and attempt to resolve with the Department.
2. The issues of concern in the proposed permit have been provided verbally to the Department. Subsequently, a letter with the issues of concern raised by the proposed permit was provided to the Department. Follow-up discussions have also occurred.

3. Such continuing discussions are more efficient than filing a Petition for Hearing.

4. The issues with the proposed construction permit were not be resolved in time for construction during the annual mill outage scheduled to begin May 7. (GP and the Department are discussing a much smaller interim maintenance project to replace a minimum number of tubes while the unit is down, which GP believes does not require permitting.) The issues involving the proposed construction permit will remain regardless of the routine maintenance issue.

5. GP consulted with the Department, Trina Vielhauer, who indicated the Department would not object to an additional thirty-day extension.

WHEREFORE, Petitioner respectfully requests that the Department enter an Order allowing until June 12, 2006 to file a petition seeking a formal administrative proceeding or to publish a Notice of Intent to Issue Construction Permit in the above-styled matter. Should the Motion not be granted, GP requests that this Motion be treated as a Petition for Formal Administrative Proceedings.


Respectfully submitted this 11th day of May 2006.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct of the foregoing has been furnished via Electronic Transmission this 11th day of May 2006, to:

Pat Comer
Jack Chisholm
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Trina Vielhauer
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400



Terry Cole
Fla. Bar No. 133550
Oertel, Fernandez, Cole & Bryant, P.A.
P.O. Box 1110
Tallahassee, Florida 32302
(850) 521-0700
(850) 521-0720 Facsimile

F:\TC\PLDS\1504 Georgia-Pacific\Second Motion for Extension of Time Recovery Boiler 035-AC.doc

Gibson, Victoria

From: Gibson, Victoria
Sent: Thursday, May 11, 2006 4:30 PM
To: Mitchell, Bruce
Subject: FW: Georgia Pacific

FYI,

Cc me on your response to Pat Comer in regards to granting or denying their request.

Vickie

From: Miskelley, Valerie
Sent: Thursday, May 11, 2006 4:27 PM
To: Gibson, Victoria
Subject: Georgia Pacific

Vickie,

Just wanted to let you know we have rec'd the request for extension of time for Georgia Pacific -035-AC. It came by email to Pat. I have updated LCT.

Have a great weekend!

Valerie

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**GEORGIA-PACIFIC CORPORATION,
PALATKA OPERATIONS,**

Petitioner,

v.

OGC No. 06-0921
DEP Permit No. 107005-035-AC

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

107005-035-AC

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (FDEP) upon receipt of a request made by Petitioner, Georgia-Pacific Corporation, to grant an extension of time to file a petition for an administrative hearing to allow time to discuss with FDEP several specific permit conditions for its facility in Palatka, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **May 11, 2006**, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 24th day of April, 2006, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail this 24th day of April, 2006, to:

Terry Cole
Oertel, Fernandez, Cole & Bryant
PO Box 1110
Tallahassee Florida 32302

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



PATRICIA E. COMER, Assistant General Counsel
3900 Commonwealth Boulevard - MS 35
Tallahassee, Florida 32399-3000
850-245-2288 facsimile 850-245-2302

with a courtesy copy via facsimile to:

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resource Management

facsimile: 850-921-9533

and to

Christopher L. Kirts, District Air Program Administrator
North East District

facsimile: 904-448-4363

Gibson, Victoria

From: Comer, Patricia
Sent: Monday, April 24, 2006 2:53 PM
To: Kirts, Christopher; Nasca, Mara; Vielhauer, Trina; Koerner, Jeff
Cc: Gibson, Victoria
Subject: orders on cases (multiple)
Sensitivity: Confidential

According to my stack of stuff the following orders went out today (we have been a bit backed up, but we should be caught up now—please let mw know if anything's missing)---we will be copying applicable offices with the orders.

CSX v Cedar Bay permits 0310337-009-AC, & -010-AV, OGC cases 05-2689, 05-2690, Order Closing files (petitions withdrawn)

GAPAC permit 1070005-031-AV, OGC case 05-2858 Order Granting Third Extension (to June 12)

GAPAC permit 1070005-035-AC (PSD) OGC case 06-0921, Order Granting Extension (to May 11)

Mosaic Phosphates So Pierce permit 1050055-014-AV OGC cases 05-0650, Order Granting Tenth Extension (to May 15)

Mosaic Fertilizer New Wales 1050059-045-AV, OGC case 06-0785 Order Granting Second Extension (to May 15)

Mosaic Fertilizer New Wales 1050059-042-AC OGC case 06-0786 Order Granting Extension (to May 15)

**DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF FLORIDA**

GEORGIA-PACIFIC CORPORATION,
Palatka Operations,

Petitioner,

v.

**GP Air Construction Permit Project No.:
1070005-035-AC/PSD-FL-367 Recovery
Boiler Modification**

DEPARTMENT OF ENVIRONMENTAL
PROTECTION, STATE OF FLORIDA

Respondent.

_____ /

MOTION FOR EXTENSION OF TIME

Petitioner, GEORGIA-PACIFIC CORPORATION ("GP"), pursuant to Rule 62-110.106(4), Fla. Admin. Code, hereby requests a sixty-day extension of time within which to file a petition seeking a formal administrative proceeding and within which to publish a Notice of Intent to Issue a construction permit in the above-styled matter concerning the agency action proposed by Respondent, the FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION. This request is in response to the letter providing notice of intent to issue a permit, dated March 30, 2006, and is timely filed. In support of this request, Petitioner states:

1. GP has a number of issues in the permit which it needs to discuss and attempt to resolve with the Department.
2. The issues of concern in the proposed permit have been provided verbally to the Department and a letter with the issues of concern presented by the proposed permit will follow.
3. Such discussions would be more efficient than filing a Petition for Hearing.
4. The issues with the proposed construction permit may not be resolved in time for construction during the annual mill outage currently scheduled to begin May 7. (GP and the

Department are discussing a much smaller interim maintenance project to replace a minimum number of tubes while the unit is down, which GP believes does not require permitting.) The issues involving the proposed construction permit will remain regardless of the routine maintenance issue.

5. Counsel for Petitioner has consulted with counsel for the Department, Pat Comer, who has indicated a need to get her client's position prior to taking a position on the Motion.

WHEREFORE, Petitioner respectfully requests that the Department enter an Order allowing until June 14, 2006 to file a petition seeking a formal administrative proceeding or to publish a Notice of Intent to Issue Construction Permit in the above-styled matter. Should the Motion not be granted, GP requests that this Motion be treated as a Petition for Formal Administrative Proceedings.

Respectfully submitted this 11th day of April 2006.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct of the foregoing has been furnished via Electronic Transmission this 11th day of April 2006, to:

Pat Comer
Jack Chisholm
Department of Environmental
Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Trina Vielhauer
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400



Terry Cole
Fla. Bar No. 133550
Oertel, Fernandez, Cole & Bryant, P.A.
P.O. Box 1110
Tallahassee, Florida 32302
(850) 521-0700
(850) 521-0720 Facsimile

Gibson, Victoria

From: Crandall, Lea
Sent: Tuesday, April 11, 2006 2:16 PM
To: Chisolm, Jack; Gibson, Victoria; Mitchell, Bruce
Subject: Request for Extension of Time rec'd - 1070005-35-AC (Boiler Modification) - Georgia Pacific
Attachments: Motion for Extension of Time Recovery Boiler 035-AC.pdf

FYI, a Request for Extension of Time was rec'd. today re: 1070005-35-AC (Boiler Modification) - Georgia Pacific.

Thanks,
Lea

Lea Crandall

Agency Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212 SC: 205-2212
Fax: (850) 245-2303

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

From: Becki Frazier [mailto:bfrazier@ohfc.com]
Sent: Tuesday, April 11, 2006 11:38 AM
To: Crandall, Lea
Cc: Chisolm, Jack; Comer, Patricia; Vielhauer, Trina; Carpenter, Myra J.; Edward Jamro; Scott Matchett
Subject: Filing for today

Please the attached for filing today. Thanks and have a great day.

<<Motion for Extension of Time Recovery Boiler 035-AC.pdf>>

Becki Frazier
Legal Assistant to Terry Cole,
Patricia Renovitch, Scott Foltz,
and Jeffrey Brown
Oertel, Fernandez, Cole & Bryant, P.A.
301 S. Bronough St., Suite 500
P.O. Box 1110 (32302-1110)
Tallahassee, Florida 32301
Phone: (850) 521-0700
Fax: (850) 521-0720
www.ohfc.com

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4/12/2006

Chronology of Activities

OGC Number **06 0921** **54 AC** District **NORTHEAST** County **PUTNAM**
 Style of Case **GEORGIA-PACIFIC CORPORATION - PALATKA OPERATIONS VS. DEP**
 Program Area **AIR CONSTRUCT** Mode **ADMINISTRATIVE**
 Lead Attorney **PATRICIA E COMER** Status **CLOSED**
 Forum Name _____ Forum Case Number _____
 Permit Appl **1070005-035-AC** Final Order Number _____

Date *	Code	Activity Description
04/11/2006	REX1	RECEIVED FIRST REQUEST FOR EXTENSION OF TIME
04/12/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY PATRICIA E COMER
04/24/2006		ORD GRANTING REQUEST FOR EXT OF TIME UNTIL 05/11/06
05/11/2006	REX2	RECEIVED SECOND REQUEST FOR EXTENSION OF TIME
05/16/2006		ORD GRANTING SECOND REQUEST FOR EXT OF TIME UNTIL 06/12/06
06/09/2006	REX3	RECEIVED THIRD REQUEST FOR EXTENSION OF TIME
06/19/2006		ORD GRANTING THIRD REQUEST FOR EXT OF TIME UNTIL 07/12/06
07/13/2006		WITHDRAWAL REQUEST SENT TO TRINA VIELHAUER - WITHDRAWS
07/13/2006		THE PSD PERMIT APPLICATIONS PREVIOUSLY SENT TO DEP
07/14/2006	CC	CASE CLOSED IN OGC