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DEC 27 2004

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

BUREAU OF AIR RESOURCES

December 22, 2004

Ms. Trina L. Vielhauer, Chief
Florida Department of Environmental Protection
Division of Air Resource Management
Twin Towers Office Building
2600 Blair Stone Road MS #5505
Tallahassee, Florida 32399-2400

Re: Georgia-Pacific Palatka Mill
Air Construction Permit – Project No. 1070005-028-AC / PSD-FL-341
Comments on Proposed Permit

Dear Ms. Vielhauer:

Georgia-Pacific offers the following comments on the proposed air construction permit referenced above.

COMMENT 1:

GP requests that 62-296.320 section (4)(c)4 be added to specific condition F.

Please change F.2 as indicated below: (Additions in bold and underlined)

2. Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter (PM) from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following: a) Paving and maintenance of roads, parking areas and yards; b) application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing; c) application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; d) removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent PM from becoming airborne; e) landscaping or planting of vegetation; f) use of hoods, fans, filters, and similar equipment to contain, capture and/or vent PM; g) confining abrasive blasting where possible; and, h) enclosure or covering of conveyor systems. **In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the techniques or practice, and the degree of reduction of emissions expected from a particular technique or practice.**

[Rules 62-296.320(4)(c)1., 3., & 4. F.A.C.]

COMMENT 2:

We believe that because the TV Reapplication is due to be submitted to DEP's Northeast Office in early 2005, it is appropriate to include the BMP Plan as part of that submittal.

There fore we recommend changing F.4 as indicated below (Changes in bold and underlined)

4. Pursuant to the BACT determination, Best Management Practices (BMP) shall be used to minimize VOC emissions from the outside storage of bark and wood chips. Therefore, a BMP Plan to minimize the VOC emissions from the outside storage of bark and wood chips shall be submitted to the NED for approval **as part of the facility's** application for an operation permit (Title V Renewal **due prior to April 30, 2005**) and shall be finalized and incorporated into the Title V Air Operation Permit.

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

Sincerely,



Myra J. Carpenter
Environmental Superintendent

mjc

cc: Christopher L. Kirts, FDEP
T.D. Kennedy, W.M. Jernigan, S.D. Matchett, T. Wyles



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DEC 03 2004

BUREAU OF AIR REGULATION

Palatka Pulp and Paper Operations
Consumer Products Division

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

November 30, 2004

Mrs. Trina L. Vielhauer, Chief
State of Florida
Bureau of Air Regulation
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

RE: Georgia-Pacific, Palatka Operations
Draft Permit Project No. 1070005-028-AC/PSD-FL-341

Dear Mrs. Vielhauer:

Please find enclosed Proof of Publication of Public Notice for Intent to Issue an air construction permit to allow the construction of a new Bark Hog, which will replace the existing one, and to edit the permitted capacity language for the No. 4 and 5 Power Boilers and No. 4 Combination Boiler and to remove the "Permitting Note" associated with the specific conditions labeled "Permitted Capacity" for the above referenced emissions.

If further information is needed, please contact me at (386) 329-0918.

Sincerely,

A handwritten signature in cursive script that reads 'Myra J. Carpenter'.

Myra J. Carpenter
Environmental Superintendent

tk

Enclosure

cc: Christopher L. Kirts, FDEP
Rita Felton-Smith, FDEP
W. M. Jernigan
Scott Matchett

STATE OF FLORIDA

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DEC 03 2004

County of Putnam

BUREAU OF AIR REGULATION

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Palatka Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

PUBLIC NOTICE OF INTENT TO ISS

Was published in said newspaper 1 time(s) with said being made on the following dates:

11/27/2004

The Palatka Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice and/or advertisement.

Allison Waters

Sworn to and subscribed to before me this 26th day of November, 2004 by Allison Waters, Administrative Assistant, of the Palatka Daily News, a Florida corporation, on behalf of the corporation.

Mary Kaye Wells

Mary Kaye Wells, Notary Public
My commission expires July 22, 2007

Notary Seal
Seal of Office:



Personally known to me, or
Produced identification:
Did take an oath

PUBLIC NOTICE
PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT
Permitting Authority: Department of Environmental Protection Bureau of Air Regulation
Draft Air Construction Permit Project No. 1070005-028-AC/PSD-FL-341
Georgia-Pacific Corporation Palatka Mill Putnam County
Applicant: the applicant for this project is the Georgia-Pacific Corporation Palatka Mill located North of CR 216 and West of US 17, Palatka, Putnam County. The applicant's Authorized Representative is: Mr. Theodore D. Kennedy, Vice President - Palatka Operations, Georgia-Pacific Corporation, Palatka Mill, P.O. Box 919, Palatka, Florida 32178-0919.
Facility Location: The applicant operates the Palatka Mill, which is a paper and pulp mill located North of CR 216 and West of US 17, Palatka, Putnam County.
Project: The applicant, Georgia-Pacific Corporation, applied on July 13, 2004, to the permitting authority for an air construction permit (AC) for a modification to the facility. On October 20, 2004, the mill requested that some specific condition language related to permitted capacity on several emissions units be added. The AC is being issued to allow the construction of a new Bark Hog which replaces the existing one to edit the permitted capacity language for three emissions units, specifically Power Boilers Nos. 4 and 5 and Combination Boiler No. 4, and to remove the Permitting Note associated with the specific conditions labeled Permitted Capacity for the above referenced emissions units.
Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes, (F.S.) and Chapters 62-4, 62-210, and 62-212, of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850-488-0114.
Project File: A complete project file is available for public inspection during normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. A copy of the complete project file is also available at the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 (Telephone: 904-807-3300).
Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely

...Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: the Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be provided to the permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Section 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency ac-

...Because the administrative hearing process is designed to formulate final agency action, the filing of a petition

means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Legal No. 04506446

11/27/04