

Palatka Pulp and Paper Operations Consumer Products Division

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

RECEIVED

SEP 02 2005

BUREAU OF AIR REGULATION

August 30, 2005

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 Application - #4 Recovery Boiler

Project No.: 1070005-027-AC/PSD-FL-226(A)

Dear Ms. Vielhauer:

As requested in your letter dated August 3, 2005, by this letter Georgia-Pacific Corporation respectfully wishes to withdraw the above referenced PSD Air Permit Application regarding the #4 Recovery Boiler.

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

Sincerely.

Theodore D. Kennedy

Vice President

CC:

M.J. Carpenter

E. Jamro

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W.M. Jernigan, Atlanta S.D. Matchett, Atlanta

T. Wyles, Atlanta



Department of Environmental Protection

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

Colleen M. Castille Secretary

August 3, 2005

CERTIFIED MAIL - Return Receipt Requested

Mr. Theodore D. Kennedy V.P. – Palatka Mill Operations Georgia-Pacific Corporation P.O. Box 919 Palatka, Florida 32178-0919

RE: Request for Additional Information (RAI) Recovery Boiler #4 1070005-027-AC/PSD-FL-226(A)

Dear Mr. Kennedy:

On April 19, 2004, the Department received a request to modify the Recovery Boiler No. 4's sulfur dioxide (SO₂) emission limits. On May 18, 2004, a request for additional information was sent to you by certified mail. Due to the length of time that has passed since that letter was sent to you with no response received, the Department is asking that the request be withdrawn.

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

Sincerely, Zecu IV whawn

Trina L. Vielhauer

Chief

Bureau of Air Regulation

TLV/bm

cc:

Chris Kirts, DEP - NED Myra Carpenter, G-PC



Department of Environmental Protection

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

Colleen M. Castille Secretary

May 18, 2004

CERTIFIED MAIL - Return Receipt Requested

Mr. Theodore D. Kennedy V.P. – Palatka Mill Operations Georgia-Pacific Corporation P.O. Box 919 Palatka, Florida 32178-0919

RE: Request for Additional Information (RAI) Recovery Boiler #4 1070005-027-AC/PSD-FL-226(A)

Dear Mr. Kennedy:

On April 19, 2004, the Department received a request to modify Recovery Boiler No. 4's sulfur dioxide (SO₂) emission limits. Based on our review of the proposed project, we have determined that the following additional information is needed in order to continue processing this application package. Please provide all assumptions, calculations, and reference material(s), that are used or reflected in any of your responses to the following issues:

- 1. In air construction permit, No. AC54-192550/PSD-FL-171, the SO₂ emission limiting standards of 109.9 lbs/hour and 481.4 TPY were established. The 109.9 lbs/hour represents the 3-hour, the 24-hour and the annual standard, as discussed in the Final Determination for this permit and used for preconstruction review purposes. This value of 109.9 lbs/hour was also used by Mr. David Buff, P.E. of Record, when modeling for the 3-hour, the 24-hour, and the annual AAQS, and when evaluating PSD increment issues for this permit. The basis for this limit, a concentration of 37.5 ppmvd @ 8% oxygen, was removed at the request of Mr. Vernon Adams for this emissions unit (see letter dated May 23, 1991; as discussions went, it was decided that we needed to only limit the independent variable, which is the 109.9 lbs/hour). These allowable SO2 emussion limitations have not been altered by any subsequent SIP air construction permitting actions to date. In order to continue processing this request, then the past SO2 actual emissions must be compared to the future allowable/potential emissions, which was also pointed out in the Final Determination for permit No. AC54-192550/PSD-FL-171; and, based on the increase in the 3-hour and the 24-hour standards that were requested, the SO2 increases (allowable to future allowable) are 1443.2 TPY and 481.4 TPY, respectively, where the PSD significant increase value of 40 TPY is established in Table 212.400-2, Chapter 62-212, F.A.C. Therefore, please submit the appropriate application pages and preconstruction review analyses pursuant to Rule 62-212.400(5), F.A.C., which should include the SO₂ emissions evaluation from past actuals to future allowables/potential. In addition, please submit the AAQS, PSD increment and additional impact analyses as required per Rule 62-212.400, F.A.C.
- 2. Referring back to issue No. 1, above, this evaluation should also revert back to and include all of the pollutant emission increases afforded by the Pollution Control Project (PCP) permitting actions, Nos. 1070005-007-AC & 1070005-017-AC, processed by the Northeast District office as if never constructed. This means that all increases of SO₂ emissions and other affected pollutants from this project and the PCP project must be included as one project for preconstruction review evaluation pursuant to Rule 62-212.400(5), F.A.C. Therefore, please submit the appropriate preconstruction review analyses pursuant to Rule 62-212.400(5), F.A.C., and include all increases of SO₂ emissions and other affected pollutants from this project and the PCP project as one project and reflect the comparison of past actual emissions to future allowable/potential emissions. In addition, please submit the AAQS, PSD increment and additional impact analyses as required per Rule 62-212.400, F.A.C.

"More Protection, Less Process"

Mr. Theodore D. Kennedy Georgia-Pacific Corporation Palatka Mill Recovery Boiler #4 1070005-027-AC/PSD-FL-226(A) Page 2 of 2

3. Since the modeling files were not received until May 10, 2004, there may be an additional RAI sent within the 30-day review period allowed by rule regarding the modeling analyses submitted. All rights for preconstruction review shall be preserved based on any response received.

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.

& Bun Thatis Trina L. Vielhauer Chief

Bureau of Air Regulation

TLV/bm

Gregg Worley, U.S. EPA, Region 4 cc: Stan Krivo, U.S. EPA, Region 4 John Bunyak, DOI-NPS Chris Kirts, DEP - NED Mark J. Aguilar, P.E., GAI Myra Carpenter, G-PC Jim Pennington, P.E., DEP-BAR Cleve Holladay, DEP-BAR



Department of Environmental Protection

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

Colleen M. Castille Secretary

April 20, 2004

Mr. John Bunyak, Chief Policy, Planning & Permit Review Branch NPS – Air Quality Division Post Office Box 25287 Denver, Colorado 80225

RE: Georgia-Pacific Corp., Palatka Mill No. 4 Recovery Boiler Modification PSD-FL-226A, 1070005-027-AC

Dear Mr. Bunyak:

Enclosed for your review and comment is a request to modify a PSD permit issued to Georgia-Pacific Corporation's Palatka Mill in Putnam County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/921-9533. If you have any questions, please contact Bruce Mitchell, review engineer, at 850/413-9198.

Sincerely,

W James K. Pennington, P.E.

Administrator

North Permitting Section

JKP/pa

Enclosure

cc: B. Mitchell

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by Arrivase Print Clearly) B. Date of Delivery C. Signature Agent D. Is delivery address different from item 1? Yes
1. Article Addressed to	If YES, enter delivery address below:
Mr. Theodore D. Kennedy V.P Palatka Mill Operations Georgia-Pacific Corporation P. O. Box 919	3 Service Type
Palatka, FL 32178-0919	XX Certified Mail
	4. Restricted Delivery? (Extra Fee) ☐ Yes
2. Article Number (Copy from service label) 7000 0600 0026 4129 7989	
PS Form 3811, July 1999 Domestic R	eturn Receipt 102595-99-M-1789

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00	Restricted Delivery Fee (Endorsement Required)			
00	Total Postage & Fees	\$		
-	Recipient's Name (Please Print Cleasins to ecompleted by maller) Mr. Theodore D. Kennedy			
7000	P. O. Box 919			
7	Palatka, FL 32178-0919			
	PS Form 3800, February 2000 See Reverse for Instructions			

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