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BUREAU OF AIR REGULATION

1070005-030-AC : #4 Winkler
1070005-033-AC : #4 Combined
Boiler

Georgia-Pacific Corporation

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Atlanta, Georgia 30348-5605
(404) 652-4000
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October 4, 2005

Jeffery F. Koerner P.E.
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

Re: Georgia-Pacific Corporation Palatka Sawmill Particulate Matter Issue Update

Mr. Koerner:

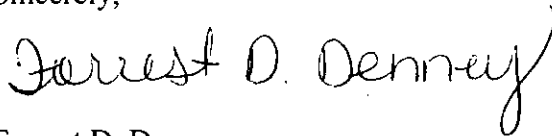
Georgia-Pacific Corporation (GP) has continued to make significant progress in resolving our particulate matter issues at our Palatka Sawmill. Our modeling analyses completed in May and July this year indicated predicted exceedances of the National Ambient Air Quality Standards and PSD Class II allowable increments. The analyses implicated the modeled emission rates at the sawmill were primarily responsible. We appreciate the opportunity to work with the Department to resolve these issues. We submitted a work plan to the Department on September 16th. At this time, we would like to advise you of several developments relevant to the first few milestones on the work plan:

1. We have obtained more representative particle size distribution data for many sources. The data reduces the PM10 fraction of total PM emissions from 50% or greater to less than 1%. For example, sawdust from block saws was provided to our control equipment vendor, Fischer-Klausterman for their design of a cyclone system for this material. Their analyses indicate less than 1% is PM10. Using the new data dramatically reduces modeled emissions and predicted impact for these sources. We have completed other sensitivity analyses for the remaining sources.
2. We have reviewed draft AERMOD guidance presented at the 8th Modeling Conference by USEPA (September 22, Research Triangle Park) and continue to evaluate AERMET. Cleve Holladay has provided us with a template from EPA Region IV (Stan Krivo) to request a case-by-case approval of using AERMOD.

3. We have hired DEECO as a stack test contractor to measure PM emissions from our lumber kilns. The sampling is scheduled for the week of October 17, 2005. A brief description of the testing protocol is attached for your review.

Should you have any questions regarding this, feel free to contact me at (404) 652-5042 or by email at fddenney@gapac.com or Mark Aguilar at (404) 652-4293, mjaguila@gapac.com.

Sincerely,



Forrest D. Denney
Senior Environmental Manager
Environmental Affairs

Cc:

Chris Kirts, PE Regional Air Administrator
Scott Matchett
Mark Aguilar
Lawrence Otwell
Glenn Moseley
Fritz Mason
Dan Bowen
Myra Carpenter

**Georgia Pacific Corporation
Palatka, FL Sawmill
Lumber Kiln Particulate Testing Protocol
October 2005**

Emission Unit No: 001
Kilns 1 and 2
Each fired by a direct-fired sawdust burners (26 MMBtu/hr)

Emission Points: EP01 – Kiln No. 1
EP02 – Kiln No. 2

Test Methods: EPA Methods 3, 4 and 14 for determining velocity, flow rate, oxygen and carbon dioxide content and moisture.

EPA Method 5 for determining filterable particulate matter

Testing will be conducted with a field staff of three with one recovery trailer. Flue gas flowrate will be monitored continuously for each of the twelve kiln vents during the entire kiln drying cycle. Particulate will be measured over the entire cycle (which averages 19 hours) with four sample systems (two on each side). Sampling boxes constructed out of plywood lined with sheet metal will cover each kiln vent. Field erected stacks will be attached to the sampling boxes. A man-lift will be used to access the sampling locations.