



Georgia-Pacific

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September 16, 2005

BUREAU OF AIR REGULATION

Georgia-Pacific Corporation
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Scott D. Matchett
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Via First Class Mail

Ms. Trina 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: GP Palatka Sawmill Particulate Issues

Dear Trina:

Thanks very much for your voicemail and phone call this week. I appreciate you getting back to me so promptly after our group conference call this past Monday.

As I mentioned on the call Monday, GP's Palatka Sawmill is committed to addressing the modeled ambient Sawmill exceedances as promptly as reasonably possible. To that end, as I mentioned yesterday, enclosed is a proposed action plan, with concrete steps and milestones, for doing so. You will see that it would result in GP submitting a minor source construction permit application for whatever changes are necessary at the Sawmill by February 15, or sooner if possible. We will try to squeeze any additional time out of the schedule if possible, realizing that (as Forrest Denney explained in the Monday call) the issues regarding characterization and quantification of particulate at such a facility are complicated and novel.

Please feel free to call me if you have any questions. If your staff has technical questions, we will put them in touch with the right technical people on our end.

Thanks again.

Sincerely,

Scott D. Matchett

Enclosure

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cc: Myra Carpenter
Ed Jamro
Mark Aguilar
Tammy Wyles
Forrest Denney
Terry Cole

GP Palatka Sawmill Action Plan

Step 1. Analyze with model to determine more sensitivities. Allow time to review modeling protocol with current model with FDEP. This step includes adding hypothetical enclosures around fugitives, adjusting kiln exhaust temperatures, turning sources off at night, etc. Complete by October 5th.

Step 2. Evaluate AERMET data (available from contractors) and running AERMOD. Allow time to review modeling protocol for this model with FDEP. Complete by October 10th.

Step 3. Conduct a source test on one of the existing kilns to determine Method 5 PM. Include time for a source test protocol to be reviewed by FDEP. Test execution will take up to two days. To make the results useful in scenarios involving power vents, the test should include PM emissions over an entire charge (approximately 20 hours) and other guidance from contractor and NCASI. Method also needs to consider particle size data as the ambient standards only apply to PM10. Allow 3 weeks after the test for test report to be finalized and report the results to FDEP. Complete by November 5th.

Step 4. Review test results internally with any data available from kiln manufacturers or trade groups (e.g., NCASI). Complete by November 1st.

Step 5. Develop general engineering solutions and cost estimates to mitigate fugitive PM emissions from the most culpable sources (e.g., enclosures). Also, develop general design for modeling a power vent configuration. Allow for additional site visits as needed. Complete by November 15th.

Step 6. Re-analyze with preferred air model the best engineering solutions for fugitives and the stack test results. Complete by November 20.

Step 7. Iterate to solve any issues, including a power vent. Complete by November 30.

Step 8. Report model solution to FDEP in a letter report and begin scoping any final engineering plans and prepare a construction schedule. Complete by December 15.

Step 9. Complete draft construction schedule and submit to FDEP. Complete by Feb 1.

Step 10. Reconcile any differences to account for air quality goals and construction logistic and resources issues. Submit permit application for new enforceable limits/operations that demonstrate compliance with construction schedule. Complete by February 15.