



Palatka Pulp and Paper Operations
Consumer Products Division

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

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DIVISION OF AIR
RESOURCE MANAGEMENT

April 4, 2005

CERTIFIED MAIL

EPA Region IV
Director
Air, Pesticides, and Toxics Management Division
61 Forsyth Street, SW
Atlanta, Georgia 30303

RE: MACT Compliance Status – Non-binding Control Strategy Report

Dear Director:

As required by 40 CFR Sections 63.9(b)(2) and 63.455(b), Georgia-Pacific Corporation, Palatka Operations, submits this update of the required non-binding control strategy report.

Section 63.9(b)(2):

- (i) Address of the owner:
Georgia-Pacific Corporation
P. O. Box 105605
Atlanta, GA 30348-5605
- (ii) Address of the affected source:
Georgia-Pacific, Palatka Operations
County Road 216
P. O. Box 919
Palatka, FL 32178
- (iii) The relevant standard is the National Emission Standard for Hazardous Air Pollutants, Section 63.440(d)(1) which has a compliance date of April 27, 2006.
- (iv) The Facility is a fully integrated pulp and paper mill designed to produce approximately 1850 tons per day (monthly average) of kraft pulp, which is processed into either unbleached or bleached kraft paper and tissue products. Hazardous air pollutant sources are identified as the bleaching system, evaporator system, pulping system, HVLC and LVHC systems, pulping process condensates, chemical recovery system (includes recovery boiler and smelt dissolving tank) and turpentine recovery system.

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(v) The facility is a major source.

Section 63.445(b):

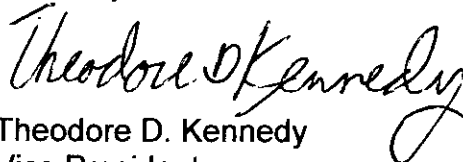
Georgia-Pacific operates a Kraft pulping operation as specified in Section 63.440(d)(1) and provides the following information:

- (1) The requirements of Section 63.443(a)(1)(iii), pulp washing system and 63.334(a)(1)(iv), decker system are applicable. Under the requirements of Section 63.443(a)(1)(ii) the knotter and screen system will be tested to determine if they are subject to the standard. If applicable, a vent collection system will be designed and installed to facilitate the required control of said HAP emissions from the knotter and screen system.
- (2) The attached Table 1, Non-binding Control Strategy, lists the dates as required by Section 63.455(b)(2)(I,ii,iii,iv,v, and vii).
- (3) Compliance with the standards for the High Volume Low Concentration systems must be achieved as expeditiously as possible, but in no event later than April 16, 2006. Georgia-Pacific estimates that compliance with the HVLC system requirements will be achieved by start-up of the new Brown Stock Washing System or April 16, 2006, whichever is earlier.

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

This letter should meet the update notification reporting requirements. If you have questions or need additional information, please contact me at (386) 329-0918.

Sincerely,



Theodore D. Kennedy
Vice President

Attachment

cc: M. J. Carpenter
R. R Kaminskas
W. M. Jernigan
S. D. Matchett
Christopher L. Kirts, FDEP, Jacksonville
Howard L. Rhodes, FDEP, Tallahassee

Table 1 - Non-Binding Control Strategy Report (April 2005 Update)
MACT I Requirements for the Pulp and Paper Industry
Georgia-Pacific Corporation
County Road 216, Post Office Box 919
Palatka, Florida 32178

Description of Process Modifications Required				MACT Compliance Schedule					
Control Requirement	Process Equipment Affected by Control Requirement	Process Modification Selected	Implementation Status	Date of Completion of Major Engineering Study	Contract Award Date for Process Modifications	Initiation Date for On-Site Construction	Completion Date for On-Site Construction	Performance Date for Final Compliance Tests	Final Compliance
HVLC System	Foam Towers (4) Brown Stock Washers (4) Deckers	Replacement of the Brown Stock Washing System with a new washing system from which the off-gases will be collected and combusted.	Engineering Study Complete	Engineering Study Completed May 1, 2004	February 4, 2005	August 17, 2004	April 16, 2006	October 15, 2006	October 15, 2006
	Knotter/Screen systems	Evaluate these systems to determine if they will require collection and control	Engineering Study Complete	Engineering Study Completed May 1, 2004	February 4, 2005	August 17, 2004	April 16, 2006	October 15, 2006	October 15, 2006
	Oxygen Densification System	Off gases will be collected and combusted	Engineering Study Complete	Engineering Study Completed May 1, 2004	February 4, 2005	August 17, 2004	May 1, 2008	October 15, 2008	October 15, 2008