


# Florida Department of Environmental Protection

## Memorandum

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TO: Trina Vielhauer, Bureau of Air Regulation  
FROM: Jeff Koerner, New Source Review Section   
DATE: July 2, 2009  
SUBJECT: Exemption from Requirement to Obtain an Air Construction Permit  
Georgia-Pacific Palatka Mill  
Replacement of Drum on Lime Mud Pre-Coat Filter  
Project No. 1070005-063-AC

Attached for your approval and signature is a letter exempting the applicant from the requirement to obtain and air construction permit to replace the drum on the lime mud pre-coat filter. The project is described in detail in the attached Technical Evaluation and Preliminary Determination. I recommend your approval and signature.

Attachments



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

July 6, 2009

*Sent by Electronic Mail – Received Receipt Requested*

Mr. Gary L. Frost, Vice President  
Georgia-Pacific Palatka Mill Operations  
P.O. Box 919  
Palatka, FL 32178-0919

Re: Exemption from the Requirement to Obtain an Air Construction Permit  
Georgia-Pacific Consumer Operations LLC, Palatka Mill  
Project No. 1070005-063-AC  
Drum Replacement for Lime Mud Pre-Coat Filer

Dear Mr. Frost:

On June 25, 2009, Georgia-Pacific Consumer Operations LLC submitted an application for an air construction permit to authorize replacement of the drum for the lime mud pre-coat filter at the Palatka Mill. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The Department reviewed this request and makes the following determination.

**Determination:** The lime mud pre-coat filter is actually part of the No. 4 lime kiln processing unit, but is not specifically regulated in the current Title V air operation permit. It is not subject to any specific regulations or permit requirements. The like-kind replacement of the lime mud pre-coat filter drum will impose no new permit requirements or conditions. The purpose is to maintain this unit in good working order. The applicant's analysis shows a small increase in potential emissions of volatile organic compounds (1.8 tons per year) and total reduced sulfur (0.13 tons/year); however, there is no need to submit annual reports of actual emissions pursuant to Rule 62-212.300(1)(e), Florida Administrative Code (F.A.C.) since the applicant used potential emissions to represent emissions after completing the project. A complete review of this project is summarized in the attached Technical Evaluation and Preliminary Determination.

Pursuant to Rule 62.4.040(1)(b), F.A.C. and for the reasons stated in the Technical Evaluation and Preliminary Determination, the Bureau of Air Regulation determines that the activity will not emit air pollutants, "... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified." Therefore, the Department authorizes the replacement and exempts the project from the requirement to obtain an air construction permit. This determination is based on a technical review of the complete application and reasonable assurances provided by the applicant. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

**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 F.A.C. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air

## **EXEMPTION FROM AIR CONSTRUCTION PERMITTING**

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Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 21 days of receipt of this written notice of exemption from air permitting requirements. 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 (in a proceeding initiated by another party) 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 when and how each petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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 the 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 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. 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.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed

**EXEMPTION FROM AIR CONSTRUCTION PERMITTING**

within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/jfk

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Exemption from Air Construction Permitting was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 7/6/09 to the persons listed below.

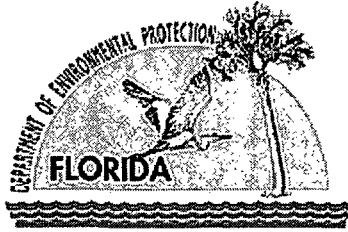
- Mr. Gary L. Frost, Georgia-Pacific ([gary.frost@gapac.com](mailto:gary.frost@gapac.com))
- Mr. Mark Aguilar, Georgia-Pacific ([mjaguila@gapac.com](mailto:mjaguila@gapac.com))
- Mr. Ron Reynolds, Georgia-Pacific ([ron.reynolds@gpac.com](mailto:ron.reynolds@gpac.com))
- Mr. Michael Curtis, Georgia-Pacific ([michael.curtis@gapac.com](mailto:michael.curtis@gapac.com))
- Mr. Christopher Kirts, NE District Office ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))
- Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
(Clerk)

7/6/09  
(Date)



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Georgia-Pacific Consumer Operations LLV  
Georgia-Pacific Palatka Mill  
215 County Road 216  
Palatka, Florida

Facility ID No. 1070005

**PROJECT**

Project No. 1070005-063-AC  
Application for Minor Source Air Construction Permit  
Replacement Drum for Lime Mud Pre-Coat Filter

**COUNTY**

Putnam, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section  
Mail Station #5505, 2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

July 2, 2009

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### **Facility Description and Location**

Georgia-Pacific Consumer Operations LLC operates the Palatka Mill, which consists of an unbleached and bleached Kraft pulp and paper mill categorized under Standard Industrial Classification Code Nos. 2611 and 2621. The existing facility is located in Putnam County at 215 County Road 216 in Palatka, Florida. The UTM coordinates of the existing facility are Zone 17, 434.0 km East, and 3283.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### **Plant Process Description**

The existing Palatka Mill operates includes the following equipment: a batch digester system, multiple effects evaporator system, condensate stripper system, recovery boiler, smelt dissolving tanks, lime mud pre-coat filter, lime kiln, tall oil plant, utilities, bleach plant, chlorine dioxide plant, and other miscellaneous equipment used to produce finished paper products from virgin wood. Using the Kraft sulfate process, wood chips are mixed with the cooking liquor (also called white liquor, which consists of a solution of sodium hydroxide and sodium sulfide) and cooked under pressure. The spent liquor (weak black liquor) is concentrated and sodium sulfate is added to make up for chemical losses. Much of the moisture is driven off of the weak black liquor in the multiple effects evaporators. The black liquor solids (BLS) are burned in the recovery boiler to produce a smelt of sodium carbonate and sodium sulfide. The smelt is dissolved in water to form green liquor to which quicklime (calcium oxide) is added to convert the sodium carbonate back to sodium hydroxide. The sodium carbonate and hydroxide are again used to reconstitute the cooking liquor. The spent lime cake (calcium carbonate) is de-watered in the lime mud pre-coat filter and then re-calcined in the rotary lime kiln to reconstitute the quicklime for the process. Other steam and energy needs are met by the combination boilers and power boilers, which burn a variety of fuels including wood chips, fuel oil and natural gas.

### **Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

**Project Description**

The lime mud pre-coat filter is a critical part of the liquor cycle at the mill. It is used to de-water lime mud fed into the No. 4 lime kiln prior to calcining. If the lime kiln goes down, the mill may continue to operate with purchased lime, but the lime mud pre-coat filter must still be available to de-water the lime mud for future use. If the lime mud pre-coat filter fails, the mill's liquor cycle would be shut down until repairs were completed.

On June 29, 2009, the applicant submitted an application for a minor source air construction permit requesting the authority to replace the drum on the lime mud pre-coat filter with a like-kind replacement of the same approximate size (12 feet in diameter and 16 feet in length) and capacity matched to existing lime kiln (19.4 tons/hour of quicklime). There will be no change in the method of operation. The lime mud pre-coat filter has been in service since 1976. Over the last three years, the following extensive internal repairs have been made to the drum to address corrosion: temporary re-enforcement rings were added to the internal support rings; temporary re-enforcement was added to the structural members on both heads; and the I-beam structural members of the drum heads were re-enforced with T-bar. Replacement is now necessary to ensure reliable operation of the Palatka Mill. Based on industry experience, the lime mud pre-coat filter is replaced between one to three times during the life cycle of the lime kiln. This work is scheduled to be completed during the upcoming maintenance outage for the Reausticizing Area planned to begin September 1, 2009.

**2. PSD APPLICABILITY**

**General PSD Applicability**

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for PSD pollutants (e.g., carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); total reduced sulfur (TRS), etc.).

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

(BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

### PSD Applicability for Project

The lime mud pre-coat filter emits small amounts of TRS and VOC. Processing the lime mud through the filter generates point source TRS and VOC emissions from the vacuum pump exhaust at 6000 acfm. Fugitive TRS and VOC emissions are driven off of the lime mud as it is processed through the filter drum. There may also be negligible amounts of particulate matter, but note that the lime mud is wet entering the process and still contains moisture after de-watering. As provided in the application, the following table summarizes the baseline emissions, potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	Emissions Rates, Tons per Year				Subject to PSD?
	Baseline	Potential	Change	Significant Emissions Rate	
TRS	0.09	0.13	+0.04	10	No
VOC	1.30	1.80	+0.50	40	No

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. As allowed in Rule 62-210.200, F.A.C., the applicant elected to use potential emissions after completion of the project.

### 3. APPLICATION REVIEW

The lime mud pre-coat filter is actually part of the No. 4 lime kiln processing unit, but is not specifically regulated in the current Title V air operation permit. It is not subject to any specific regulations or permit requirements. The like-kind replacement of the lime mud pre-coat filter drum will impose no new permit requirements or conditions. The purpose is to maintain this unit in good working order. Although the applicant’s analysis shows a small increase in potential TRS and VOC emissions, there is no need to submit annual reports of actual emissions pursuant to Rule 62-212.300(1)(e), F.A.C. since the applicant used potential emissions to represent emissions after completing the project.

### 4. PRELIMINARY DETERMINATION

Pursuant to Rule 62.4.040(1)(b), F.A.C., the Bureau of Air Regulation determines that replacement of the lime mud pre-coat filter will not emit air pollutants, “... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified.” Therefore, the Department will authorize the applicant to perform the work, but the project is exempt from the requirement to obtain an air construction permit. This determination is based on a technical review of the complete application and reasonable assurances provided by the applicant. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of the Department’s determination shall be maintained at the site of the proposed activity. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Bureau of Air Regulation, 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.



## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, July 06, 2009 2:34 PM  
**To:** 'GARY.FROST@GAPAC.com'  
**Cc:** 'mjaguila@gapac.com'; 'ron.reynolds@gpac.com'; 'michael.curtis@gapac.com'; Kirts, Christopher; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** GA-Pacific - PALATKA PULP and PAPER MILL; 1070005-063-AC - Exemption from the Requirement to Obtain an Air Construction Permit  
**Attachments:** 1070005-063-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Exemption from the Requirement to Obtain an Air Construction Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.063.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.063.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC

**Facility Name:** PALATKA PULP and PAPER MILL

**Project Number:** 1070005-063-AC

**Permit Status:** FINAL / Exemption

**Permit Activity:** CONSTRUCTION

**Facility County:** PUTNAM

**Processor:** Jeff Koerner

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Tracking:

## Livingston, Sylvia

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**From:** Reynolds, Ron E. [Ron.Reynolds@GAPAC.com]  
**Sent:** Monday, July 06, 2009 5:04 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: GA-Pacific - PALATKA PULP and PAPER MILL; 1070005-063-AC - Exemption from the Requirement to Obtain an Air Construction Permit

Sylvia,

Documents received and viewed.

Thank you,

Ron Reynolds  
Environmental Engineer - Air Quality  
Georgia Pacific - Palatka Mill  
Office 386-329-0967  
Cell 386-916-3133

-----Original Message-----

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, July 06, 2009 4:02 PM  
**To:** Reynolds, Ron E.  
**Subject:** GA-Pacific - PALATKA PULP and PAPER MILL; 1070005-063-AC - Exemption from the Requirement to Obtain an Air Construction Permit

Dear Sir/ Madam:

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*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1070005.063.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1070005.063.AC.F_pdf.zip)

**Owner/Company Name:** GEORGIA-PACIFIC CONSUMER OPERATIONS LLC  
**Facility Name:** PALATKA PULP and PAPER MILL  
**Project Number:** 1070005-063-AC  
**Permit Status:** FINAL / Exemption  
**Permit Activity:** CONSTRUCTION  
**Facility County:** PUTNAM

**Processor:** Jeff Koerner

## Livingston, Sylvia

---

**From:** Frost, Gary (Florida) [GARY.FROST@GAPAC.com]  
**Sent:** Monday, July 06, 2009 2:34 PM  
**To:** Livingston, Sylvia  
**Subject:** Out of Office: GA-Pacific - PALATKA PULP and PAPER MILL; 1070005-063-AC - Exemption from the Requirement to Obtain an Air Construction Permit

I will be out of the office until Monday afternoon, December 1. Please contact Robert Mumford if you need immediate assistance. Thank you If my immediate attention is required please use the following cell phone number 920-445-1031