



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960  
DEC 27 2000

**received**  
12-27-00

4APT-ARB

Myra J. Carpenter  
Superintendent, Environmental Affairs  
Georgia-Pacific Corporation  
P. O. Box 919  
Palatka, Florida 32178-0919

Dear Ms. Carpenter:

Thank you for your letter dated December 1, 2000, regarding a request from the Georgia-Pacific Corporation, Palatka, Florida, for approval of a bleach plant alternative monitoring parameter pursuant to the Pulp & Paper MACT standard. Section 63.453(c)(2) of the MACT requires subject mills to continuously monitor the gas scrubber vent gas inlet flow rate. However, the facility states that because the inlet to the gas scrubber is a very corrosive, moist environment, it is not conducive to continuous flow measurement and therefore Georgia-Pacific is seeking approval of a system to continuously monitor operation of the fan used to convey hazardous air pollutants to the bleach plant scrubber.

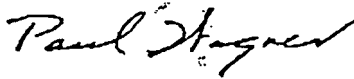
Based on the discussion of the alternative monitoring parameter issue in the Environmental Protection Agency's (EPA's) Q&A Document for the Pulp & Paper MACT (Volume 1, Page 8 - 10), Region 4 concurs that adequate rationale for using an alternative parameter (as required in 63.453(n)), has been demonstrated. Therefore, Region 4 concurs with the Georgia-Pacific request to substitute vent gas fan data (i.e., install, calibrate, operate and properly maintain a continuous monitoring system to monitor the fan amperage of the bleaching system vent gas fan) as an alternative monitoring parameter to 63.453(c)(2) and accordingly approves this specific request.

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If further assistance is needed, please contact Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,



R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

cc: Howard Rhodes, FL DEP