



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 03 2003

RECEIVED

4APT-ATMB

Theodore D. Kennedy
Vice President
Georgia Pacific Palatka Operations
P. O. Box 919
Palatka, Florida 32178-0919

MAR 05 2003

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

Dear Mr. Kennedy:

This is in response to your letter dated November 12, 2002, regarding a request by the Georgia Pacific mill in Palatka, Florida (GP-Palatka), for alternative monitoring procedures for the steam stripper, thermal oxidizer, and bleach plant scrubber. The request is being made pursuant to 40 CFR 63.453(m) of the Pulp & Paper MACT standard.

Regarding alternative monitoring for the steam stripper, GP-Palatka is requesting to monitor the steam-to-condensate ratio in lieu of continuously monitoring the condensate feed rate and the steam feed rate to the stripper, as required in 40 CFR 63.453(g)(1) and (2). The proposal states that a correlation between the process wastewater feed to the stripper and the steam feed to the stripper would be developed that will predict the most efficient use of steam required to effectively treat any rate of condensate feed to the stripper. The Environmental Protection Agency (EPA) has reviewed the rationale for the steam stripper alternative monitoring procedures and agrees that monitoring the steam-to-condensate ratio will result in a reasonable assurance of compliance. Therefore, we approve this specific request.

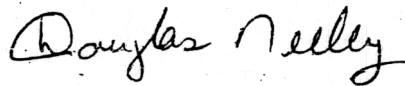
Regarding alternative monitoring for the thermal oxidizer, GP-Palatka is requesting to monitor thermal oxidizer temperature at the back end of the first pass of the unit, in lieu of monitoring temperature at the front end, as required in 40 CFR 63.453(b). Because the oxidizer is a "wet back" boiler design in which the combustion chamber is integrally surrounded by water, the heat transfer begins immediately upon the combustion gases being carried out of the flame zone to generate steam for use in the process. This particular design makes temperature measurement near the flame zone (i.e. front end) impractical and nearly impossible. The EPA concurs with your rationale for alternative monitoring procedures for the thermal oxidizer and therefore approves this specific request.

Regarding alternative monitoring for the bleach plant scrubber, GP-Palatka was previously approved to continuously monitor the operation of the fan used to convey hazardous air pollutants to the scrubber, in lieu of monitoring the scrubber vent gas inlet flow rate. The facility now requests to be able to monitor the differential pressure across the fan as a backup

monitoring parameter to the fan loading already approved. The EPA has reviewed the rationale for the alternative monitoring request for the bleach plant scrubber and agrees that monitoring the differential pressure across the scrubber fan will result in a reasonable assurance of compliance. Therefore, we approve this specific request.

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

Sincerely,

A handwritten signature in cursive script, reading "Douglas Neeley".

R. Douglas Neeley
Chief
Air Toxics and Monitoring Branch
Air Pesticides and Toxics
Management Division

cc: Mr. Chris Kirts, P.E., FDEP
