



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

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STATE OF FLORIDA
DEP NORTHEAST DIST. - JAX
AIR RESOURCES MGMT.

4APT-ATMB

Myra J. Carpenter
Georgia Pacific Palatka Operations
P. O. Box 919
Palatka, Florida 32178-0919

Dear Ms. Carpenter:

This is in response to your e-mail message dated April 14, 2003, regarding your test plans for chlorinated HAPs at the Georgia Pacific Palatka Mill (GP-Palatka) bleach plant. GP-Palatka is requesting approval of an alternative sampling time when using Test Method 26A for the determination of total chlorinated HAPs as chlorine, pursuant to the Pulp & Paper MACT standard, 40 CFR 63, Subpart S. More specifically, GP-Palatka will test as required for at least one hour during each of the 3 runs and the neutral and acid titers of each run will be used to calculate the chlorine concentration. However, as an alternative to the requirement in 40 CFR 63.457(b)(5)(ii)(F)(4), for additional testing over longer sampling times if the neutral titer is less than 0.5 milliliter (mL), GP-Palatka's sample will be acidified and titrated to the acid endpoint. If the acid titer is greater than 0.1 mL, the neutral titer will be assumed to be 0.1 mL, and the chlorine concentration will be reported as less than the calculated value. If the acid titer is less than 0.1 mL, the results will be calculated using 0.1 mL for both the neutral and acid titer.

We have previously approved similar requests for testing at bleach plants, and therefore, concur with your plans for an alternative titration procedure for Method 26A. If you have any questions, please contact Mr. Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,

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

cc: Rita Felton-Smith, FDEP