



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

October 6, 2008

Mr. Justin Edwards, C.F.E.
Putnam County Property Appraiser
Office Operations Supervisor
312 Oak Street
Palatka, Florida 32178-1920

Re: Georgia-Pacific
Pollution Control Devices

Dear Mr. Edwards:

I have reviewed the material attached to your letter dated October 2, 2008 regarding pollution control devices at Georgia-Pacific Consumer Products LLC. I also received information directly from Georgia-Pacific dated September 3, 2008. In my opinion, items associated with the primary clarifier for the wastewater treatment facility, the #4 CB and #5 PB precipitators, and the Kraft water savings equipment listed for Georgia-Pacific are “primarily for the purpose of pollution control” and are eligible for assessment as pollution control devices pursuant to §193.621, Florida Statutes.

The oxygen delignification system (required in Administrative Order No. 039-NE) is not, in my opinion, “primarily for the purpose of pollution control”. Based on the best information available to this office, this system’s primary function serves as a part of the manufacturing process. However, there are clearly environmental benefits associated with the use of this system consistent with Order No. 039-NE which requires certain manufacturing process improvements (including oxygen delignification) “in order to improve the effluent water quality...” from the facility. Therefore, I recommend that you consider allowing a percentage (I suggest perhaps half) of the value of the equipment listed as Brown Stock Washing – O2 Delig System as eligible for assessment.

The above is consistent with recommendations made by this office last year. More information is required for the newly listed items associated with the washdown station, and the oxidation pond berm reinforcement in order for me to make a recommendation on those items.

Additionally, certification from the reviewing Professional Engineer is not included. In accordance with DEP Rule chapter 62-8, Florida Administrative Code, a current evaluation of equipment by a registered Professional Engineer in the State of Florida must be submitted. My advice is to obtain the Florida registration number for the engineer responsible for the evaluation, and upon such proof of registration, approve accordingly.

If there are any questions on this determination, please contact me at (850) 245-8002.

Sincerely,

Michael P. Halpin, P.E.
Administrator, Siting Office