



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

March 4, 2009

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:

The Siting Office has reviewed your email dated February 10, 2009 and the attached Georgia-Pacific letter dated December 3, 2008 regarding pollution control devices at Georgia-Pacific Consumer Products LLC. In your email you requested a recommendation from the Department of Environmental Protection (Department) regarding the Recovery Boiler Precipitator Chloride Purge System and the Oxidation Pond Berm Reinforcement. I have addressed each item separately.

Recovery Boiler Precipitator Chloride Purge System

The Recovery Boiler Precipitator Chloride Purge System (item 0045-9485) was listed in a September 3, 2008 Georgia Pacific submittal as “2007 additions that we are still working on documentation from a PE to support as pollution control”. The following statement was included in my October 6, 2008 letter addressed to you:

“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 December 3, 2008 Georgia-Pacific letter includes a Pollution Control Equipment list of environmental regulatory requirements signed by a Professional Engineer. A Recovery Boiler Purge System is listed and described.

It would appear that the Recovery Boiler Precipitator Chloride Purge System is equipment associated with the #4 CB and #5 PB precipitators for which a recommendation was made in October. If this is the case, the same recommendation stands for the Purge System, and in my opinion item #0045-9485 is primarily for the purpose of pollution control and is eligible for assessment as a pollution control device pursuant to §193.621, Florida Statutes.

Oxidation Pond Berm Reinforcement

The Oxidation Pond Berm Reinforcement (item #0046-3218) was included in the County’s original October 2, 2008 request to the Department. I stated in my October 6, 2008 letter to

you that, "More information is required for the newly listed oxidation pond berm reinforcement in order for me to make a recommendation on that item."

The Pollution Control Equipment list attached to the December 3, 2008 Georgia-Pacific letter (mentioned above) also lists and describes a Wastewater Treatment Plant Berm. In my opinion the Oxidation Pond Berm is primarily for the purpose of pollution control and is eligible for assessment as a pollution control device pursuant to §193.621, Florida Statutes.

If there are any questions on this determination, please contact me at (850) 245-2002.

Sincerely,

A handwritten signature in blue ink that reads "Michael P. Halpin, P.E." The signature is written in a cursive style.

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