



Gary L. Frost
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June 5, 2009

Mr. Gregory J. Strong
District Director
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

Re: Administrative Order No. 039-NE

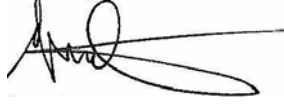
Dear Mr. Strong:

We are in receipt of your letter dated June 1, 2009, which sets forth additional actions Georgia-Pacific must take to comply with Administrative Order No. 039-NE (the "AO") before construction of a pipeline to the St. Johns River may commence. In addition to the mill's state-of-the-art pulp washing and bleaching technology already implemented under the AO, by this response, Georgia-Pacific confirms that it will take all of the corrective actions outlined in your letter, summarized as follows:

- By September 1, 2009, Georgia-Pacific will submit a report to the Department detailing the additional actions we have taken to further optimize process improvements since our March 2007 report.
- By June 15, 2009, Georgia-Pacific will reinstitute the Rice Creek monitoring plan for an additional year. Results and evaluation of the monitoring will be submitted to the Department by July 15, 2010.
- Georgia-Pacific will sample existing sediments within its wastewater treatment system ponds to determine if they are a potential source of dioxin in the wastewater discharge. Georgia-Pacific will submit a report detailing the results by September 1, 2009 and initiate any needed remediation or removal activities by December 1, 2009.
- Following the sediment sampling and any necessary remediation or removal, Georgia-Pacific will either conduct or fund the Department to conduct an additional dioxin HVS sampling event. If Georgia-Pacific elects to conduct the sampling itself, we will submit a plan of study to the Department by December 1, 2009. As you know, Georgia-Pacific has previously expressed, by letter dated April 4, 2008, from Terry Cole to Secretary Sole, our concerns regarding the HVS method. Therefore, while we agree to either conduct or fund the HVS sampling event, Georgia-Pacific must, until such time as the HVS methodology is scientifically validated and formally approved by EPA or the State of Florida for use with effluent monitoring, reserve the right to contest or challenge the use and the results of HVS for the reasons set forth in the April 4 letter to Secretary Sole.
- We will engage an independent third party contractor, mutually acceptable to Georgia-Pacific and the Department, to conduct a technical and cost feasibility study on the wastewater treatment system targeted at reducing levels of particulates, color and iron. The results of this feasibility study will be submitted in conjunction with the Rice Creek monitoring report, no later than July 15, 2010. The report will include an evaluation of whether additional technologies or control measures could be practically implemented to further minimize levels of dioxin, particulates, iron, color, specific conductivity and whole effluent toxicity in the wastewater discharge.

All of the above actions will require close coordination with your Department, and we will need to meet as soon as possible with Department staff to outline a path forward and ensure we are proceeding in line with the Department's expectations. Should you have any questions, please call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary L. Frost', with a long horizontal flourish extending to the right.

Gary L. Frost