



# Florida Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590  
Phone: 904/256-1700 ♦ Fax: 904/448-4366

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

December 1, 2010

Mr. Gary Frost  
Vice President  
Georgia Pacific  
Palatka Pulp and Paper Operations  
Consumer Products  
P.O. Box 919  
Palatka, FL 32178-0919

RE: Administrative Order No. 039-NE

Dear Mr. Frost:

The Department received your November 22 letter stating Georgia Pacific's (GP) intention to immediately begin pipeline construction to meet compliance dates specified in the Administrative Order (AO). While a permit is not required for the construction related activities identified in the letter, pursuant to the provisions of Rule 62-620.300, Florida Administrative Code, you are not authorized to use the pipeline to discharge wastewater until you have obtained proper wastewater permitting authorizations from the Department.

GP's application for renewal of the NPDES wastewater permit is under review and, as we have already advised your representatives in multiple conversations, questions remain whether GP has fully demonstrated that its discharge cannot meet applicable water quality standards in Rice Creek. Under the terms of the AO and the administratively continued wastewater permit, relocation of GP's discharge from Rice Creek to the St. Johns River is contingent on your making this demonstration.

The Department is also reviewing GP's October 1, 2010 responses to our request for additional information concerning GP's compliance with all of the terms of the AO and the Department's June 1, 2009 letter to you. We intend to send GP our remaining questions, already generally discussed with your representatives, by the end of next week.

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The Department does not agree that the submission of the final Rice Creek Water Quality Report on July 15 triggered the October 15, 2012 deadline to install the pipeline. Furthermore, the Department does not agree that GP has fully complied with all of the provisions of the AO and our June 1, 2009 letter. GP must satisfactorily resolve these questions before the Department can take action on the NPDES wastewater permit renewal.

If you have any questions, please contact me at (904) 256-1504.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory J. Strong". The signature is stylized and cursive.

Gregory J. Strong  
District Director

GS/vf