



June 17, 2011

Secretary Herschel Vinyard
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
MS 10
Tallahassee, FL 32399-3000

Dear Secretary Vinyard,

As promised, here are the questions we discussed in our letter dated June 10, 2011. I tried to be judicious in the number of questions. Although there are many outstanding issues related to the Georgia Pacific (GP) discharge permit, I've focused on topics that are related to GP meeting water quality standards in Rice Creek. I also included a few questions about a subject of much public concern, dioxin. At our meeting, you mentioned you have some concerns about dioxin yourself, and I hope this inquiry can help both St. Johns Riverkeeper and you better understand this complex issue.

Once we have these questions answered and a better understanding of the GP waste stream and manufacturing process, we will be in a more favorable position to offer a possible alternative course of action. However, even with a greater awareness and understanding of the pollution problems and issues facing the mill, please recognize that our organization is still limited in its ability to find a silver bullet for GP or your agency. We still believe that the ultimate responsibility for identifying a specific alternative solution lies with GP and the FDEP.

I'd like to reiterate something Greenovative sent to your staff on April 8, 2011 after our final meeting with FDEP:

"We have provided several examples (and a personal resume) of chemical plants and pulp and paper mills operating successfully throughout Canada and the United States in complete compliance with equally stringent and formidable environmental standards. So this Florida standard cannot be considered technically impossible when its equal has been achieved so many times in so many places. When something proved technically possible cannot be achieved, the obstacle lies with the capability of the technicians, not the technology or the standards."

"It has been said that we have suggested no new technology, no 'break-through', and no 'silver-bullet' in our discussions with you, the Florida Department of Environmental Protection and Georgia Pacific. Accepted, quite simply because all of the technology required is actually proven and available...., for appropriately qualified, capable and experienced technicians. "

We will use the information from this inquiry to once again make the case that there are potential solutions that deserve further analysis before the final permit decision is reached.

General Approaches

1. Did the Department investigate or require investigation of the treatment of high-concentration, low-volume waste collection streams in the mill that could provide more cost-effective treatment than that for whole effluent? Please, explain your answers.

Color

1. Does the Department think that there is single source of color that could be treated before wastewater enters the treatment ponds?
2. Has the Department analyzed which component of the pond system, e.g. Pond 1, Pond 4, etc. significantly adds to the color problem, i.e., a potential site of color reversion?
3. Does the Department know whether GP is maintaining an aerated Pond 1 to the reduce color reversion that occurs there?

Conductivity

1. Does the Department reject landfilling saltcake based purely upon disposal costs?
2. Does the Department believe a study has been completed that identifies the source(s) and all of the ions that contribute to conductivity in today's effluents and could affect chronic toxicity?
3. Has the Department required G-P to update its marketing analysis of saltcake to determine whether current saltcake could meet marketing specifications, as opposed to past saltcake, say from 2002 and/or 2003?

Chronic Toxicity

1. Has the Department conducted a recent and thorough toxicity identification evaluation on the current effluent as part of the draft permit process?
2. If no in #1, please explain why the Department does not think it is necessary?
3. Does the Department believe GP has verified the sources of toxicity and the potential impact(s) of the water treatment plant upgrades on the chronic toxicity problem?
4. Does the Department believe the Brown & Caldwell report replaces the need for a full toxicity identification evaluation? Was a full toxicity identification evaluation considered as part of the draft permit process?
5. Does the Department know, based on data evaluated by them, whether ions in wastewater contribute to chronic toxicity of both *C. dubia* and/or *P. promelas*?
6. Can you rule out the presence of other toxins besides aluminum in the effluent?

Chlorodioxin/Furan contamination

1. Based upon the high volume extraction and legacy solids studies, does the Department believe it fully understands the distribution of chlorinated dioxins and furans in the GP wastewater treatment system? If yes, what is (are) the source(s)?
2. If the source of dioxin is fully understood, what is the Department's strategy to eliminate dioxins in the wastewater or is simple dilution the end point?
3. What is the Department's stance on the high volume extraction technique? Does it accept the data, or believe it to be invalid?
4. Has the Department considered the legacy solids issue in the draft permit process? Does the Department consider legacy solids a problem? If so, what is the plan to remediate this problem?

Thank you for your staff's assistance with this inquiry. We appreciate their time and their willingness to provide these materials.

Once we get the responses, I will be in touch with you to schedule the “fresh look” approach you outlined in Senator Thrasher’s office.

I spent a pleasant morning on the River with the Downtown Council of the Chamber of Commerce. The St. Johns is the heart of our city.

Let’s continue to work together to protect and restore its health for your kids and their kids.

For the River,

A handwritten signature in black ink, appearing to read "Neil A. Armingeon". The signature is stylized with a large initial "N" and a long horizontal line extending to the right.

Neil A. Armingeon
St. Johns Riverkeeper