

July 25, 2022

United States Department of Justice
EES Case Management Unit
Re: DOJ # 90-5-2-1-11705
Eescdcopy.enrd@usdoj.gov

United States Environmental Protection Agency
Consent Decree Reporting System
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Mr. Tom Rheume
Arkansas Division of Environmental Quality
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**RE: *United States v. Georgia-Pacific Chemicals LLC, et al.*
Case No. 1:18-cv-01076-SOH
Final Semi-Annual Progress Report and SEP Completion Report**

To Whom It May Concern:

Pursuant to Paragraphs 39 and 27 of the Amended Consent Decree (ACD) in the above-referenced matter, the Settling Defendants, Bakelite Chemicals, LLC¹ (Bakelite) and Georgia-Pacific Crossett LLC, provide this final Semi-Annual Progress Report and Supplemental Environmental Project (SEP) Completion Report.

A. Epichlorohydrin Temporary Storage (“Epi Storage SEP”) Progress Report

As previously reported in the Settling Defendants’ January 31, 2022 semi-annual progress report, the work required to install and commence operation of the Epi Storage SEP was completed on July 20, 2021.² Pursuant to Paragraph II.A.3(c) of Appendix C of the ACD, the Epi Storage SEP is considered completed after successful operation for not less than one year, a milestone that Bakelite achieved on July 20, 2022. Accordingly, Bakelite provides the following SEP Completion Report in accordance with Paragraph 27 of the ACD.

1. A detailed description of the SEP as implemented

¹ The equity interests in Georgia-Pacific Chemicals LLC, the current owner/operator of the Chemical Facility referenced in the ACD, were recently sold to Bakelite US Holdco, Inc. Georgia-Pacific Chemicals LLC remains the legal owner/operator of the Chemical Facility, and thus paragraph 6 of the ACD was not triggered. Georgia-Pacific Chemicals LLC has since changed its name to Bakelite Chemicals, LLC.

² The United States agreed by letter dated May 20, 2021 to extend the deadline to commence operation of the Epi Storage SEP to July 27, 2021.

The Epi Storage SEP involved the redesign and reconstruction of the Chemical Facility’s Epichlorohydrin (Epi) storage capabilities to reduce the size of potential impact of any off-site consequence that could be associated with a release of Epi from the storage vessels, as computed in the Facility’s Risk Management Program Plan. Specifically, the project involved re-configuring the storage system by eliminating a trailer-based storage system with secondary containment consisting of a large surface area (which, in turn, increased the potential impact of any off-site consequence) and replacing it with a new permanent Epi storage tank.

2. A description of any problems encountered in completing the SEP and the solutions

No delays were encountered during the completion of the Epi Storage SEP over the prior six-month reporting period.

3. An itemized list of all eligible SEP costs expended

The following summary itemizing the total costs incurred to date for the Epi Storage SEP. Bakelite can provide additional detail on these line items, upon request.

Cost category	Spend	Notes
Equipment	\$112,321.41	New Epi Storage tank
Demolition Activities	\$48,297.92	Cleaning of diesel tank prior to demolition of tank, demolition of piping and other obstructions in new Epi storage tank area
Installation	\$181,257.32	Mechanical, civil and electrical installation costs
Outside Engineering	\$54,915.15	Detailed design, controls startup & support
Instrumentation	\$65,198.08	Valves, instruments, DCS components
Internal Engineering	\$151,957.46	Process design, project management, controls support, safety & environmental support
Total spend as of July 2022	\$613,947.34	No open purchase orders to be paid

4. Certification that the SEP has been fully implemented pursuant to the provisions of the Amended Consent Decree

The signatories hereby certify the completion and implementation of the Epi Storage SEP pursuant to the provisions of Section VIII and Appendix C of the ACD.

5. A description of the environmental and public health benefits resulting from the implementation of the SEP

As described in the ACD, the primary benefit of the Epi Storage SEP is the reduced surface area of the secondary containment surrounding the storage area. An additional permanent Epi storage tank was added to the storage system, replacing the temporary, trailer-based storage system. This upgrade reduces the size of the potential impact of any off-site consequences associated with a release from the storage system.

6. Any additional items detailed in Appendix C

Not applicable.

B. Changes to Notice Provisions

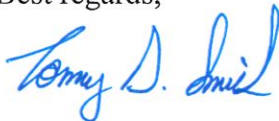
Pursuant to Paragraph 93 of the ACD, Bakelite hereby requests the following changes to the notice provisions of Paragraph 92:

As to Bakelite Chemicals by e-mail: Kelsey Bonhivert at kelsey.bonhivert@bakelite.com and Craig Sheek at craig.sheek@bakelite.com.

If you have any questions regarding this submittal, please feel free to contact Kelsey Bonhivert, Facility Environmental Manager, via email at kelsey.bonhivert@bakelite.com.

I certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and believe, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Best regards,



Tommy D. Smith
Vice President – Manufacturing
Georgia-Pacific Crossett LLC – Crossett
Paper Operations



Craig L. Sheek
Plant Manager
Bakelite Chemicals LLC – Crossett
Chemicals

cc: Ms. Cheryl Barnett, EPA (via e-mail: Barnett.Cheryl@epa.gov)