

Georgia-Pacific Crossett LLC Consumer Products

Crossett Paper Operations 100 Mill Supply Road P.O. Box 3333 Crossett, AR 71635 (870) 567-8000 (870) 364-9076 (fax) www.gp.com

March 22, 2016

Layne Pemberton, NPDES Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

RE:

Incident Report – Georgia-Pacific Crossett LLC - Crossett Paper Ops

NPDES Permit No. AR0001210

AFIN 02-00013

Dear Mr. Pemberton:

On Monday, March 18, 2016, Georgia-Pacific Crossett LLC submitted a written follow-up pertaining to the extreme flooding conditions experienced in Crossett last week. The following incident was reported in the submittal:

Leachate collection system overflows

On the morning of 3/9/2016, it was discovered that the leachate collection system associated with the mill's North Landfill (Class 3N Landfill Permit No. 0292-S3N) was overwhelmed with storm water, which overflowed the berm on the northwest corner of the landfill cell. No additional discharges from the North Landfill's leachate collection system were observed after 3/10/2016; however, the leachate collection system from the facility's East Landfill (Class 3N Landfill Permit No. 0270-S3N-R2) began to overflow the morning of 3/10/2016. This overflow seemed to have ceased by the morning of 3/11/2016. Because of the severe conditions and the difficulty in determining overflow from other storm waters, an estimate of the volume discharged cannot be made. Samples were collected from both locations.

As an update to the above report, we have received the following results from the sampling:

Location	BOD	COD	TSS	pН
Benchmark Value Maximum Concentration		120 mg/L	100 mg/L	6.0 – 9.0 S.U.
Northwest corner of North Landfill berm	4.6 mg/L	50 mg/L	94 mg/L	9.96 S.U.
Northwest corner of property boundary at North Landfill	<2 mg/L	33 mg/L	47 mg/L	7.07 S.U.
North property boundary at North Landfill	<2 mg/L	26 mg/L	17 mg/L	7.48 S.U.
North side of East Landfill leachate collection pond at spillway	<2 mg/L	50 mg/L	42 mg/L	7.27 S.U.

The pH of 9.96 measured at the North Landfill berm was slightly elevated. We believe this was most likely due to lime used at the landfill for alternative cover material as approved by Special Condition 18 of the permit. Two storm water samples were collected at the North Landfill property boundary with lower pH readings of 7.07 and 7.48.

If you have any questions, or would like more information please do not hesitate to contact Rachel Johnson at <u>Rachel.Johnson2@GAPAC.com</u> or (870) 567-8170.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Michael L. Hohnadel

Vice President - Manufacturing Georgia Pacific Crossett LLC Crossett Paper Operations



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