



Form Approved
OMB No. 2040-0003
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460
NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day					Inspec. Type	Inspector	Fac Type											
1	N	2	5	3	A	R	0	0	0	1	2	1	0	11	12	0	7	0	5	2	3	17	18	C	19	S	20	2	
Remarks																													
0	2	-	0	0	0	1	3		A	s	h	l	e	y															
Inspection Work Days						Facility Evaluation Rating						BI	QA	-----Reserved-----															
67						69	70	4						71	N	72	N	73											80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Georgia Pacific Corporation d/b/a Georgia Pacific Crossett Paper Operation, 100 Papermill Road Crossett, AR	Entry Time /Date 09:46/ 05/23/07	Permit Effective Date 01 September 2004
	Exit Time/Date 14:05/ 05/23/07	Permit Expiration Date 31 August 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Alan Thomas/Environmental Engineer-870-567-8670 James Cutbirth, Technical Service Manager/870567-8144 Fax 870-364-9076	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Karen Dickinson, Vice President 870-567-5049 Georgia Pacific Corporation P.O. Box 3333 Crossett, AR 71635	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	S	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	S	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attachment #3 for further details.

Name(s) and Signature(s) of Inspector(s) John Wesley Lamb 	Agency/Office/Telephone/Fax ADEQ/EI Dorado/870-862-5941/870-862-3509	Date 31 May 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED no)

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA
- 4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED no)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U NA
 - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING Y N NA
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N N
 - c) ANALYTICAL METHODS AND TECHNIQUES. Y N NA
 - d) RESULTS OF ANALYSES AND CALIBRATIONS. Y N NA
 - e) DATES AND TIMES OF ANALYSES. Y N NA
 - f) NAME OF PERSON(S) PERFORMING ANALYSES. Y N NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NE
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED no)

- 1. TREATMENT UNITS PROPERLY OPERATED. S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED.. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE. S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NE

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED no).
 DETAILS:

- 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. Y N NA
- 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA
- 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. Y N NA
- 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. Y N NA
- 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. Y N NA
- 6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA
 - a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA
 - b) PROPER PRESERVATION TECHNIQUES USED. Y N NA
 - c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136 Y N NA
- 7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? Y N NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED no)
 DETAILS:

- 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE parshall flume at Outfall 001, weir at SMS 002
- 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
- 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA
- 4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION April 2007) Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Y N NA
- 5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N NA
- 6. HEAD MEASURED AT PROPER LOCATION. Y N NA
- 7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED no)
 DETAILS:

- 1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) Y N NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N NA
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S M U NA
4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
5. DUPLICATE SAMPLES ARE ANALYZED, 10% OF THE TIME. Y N NA
6. SPIKED SAMPLES ARE ANALYZED, 10% OF THE TIME. Y N NA
7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME STL Mobile, Alta Analytical Perspectives Bio Analytical Inc
 LAB ADDRESS Mobile, AL, Wilmington, NC, Doyline, LA
 PARAMETERS PERFORMED AOX, Chloroform, Phenols Dioxin and Furans Biomonitoring

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED yes).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	none	None	Moderate	Yes, but not persistent	None	Dark brown	
SMS 002	Not viewed	See attachment 3					

Comments: See Attachment 3

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED yes).
 DETAILS: See Attachment 3

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES

(FURTHER EXPLANATION ATTACHED no).

1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
2. TYPE OF SAMPLE OBTAINED
 GRAB COMPOSITE SAMPLE METHOD FREQUENCY
3. SAMPLES PRESERVED. Y N NA
4. FLOW PROPORTIONED SAMPLES OBTAINED. Y N NA
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. Y N NA
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE. Y N NA
7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

DMR Calculation Check

Reporting Period: From 2007 March 01 To 2007 March 31
Year Month Day Year Month Day

Parameter Checked: BOD 001

	Loading Mass		Concentration	
	Monthly Avg. lbs/ day	Daily Max. lbs/day	Monthly Avg.-mg/L	7-Day Avg. or Daily Max- mg/L
Reported Value:	14,157	18,478	34.9	39.0
Calculated Value:	14,157	18,478	34.9	39.0
Permit Value:	26,310	50,617	70	135

If calculated value does not equal reported value, explain: equal

FLOW CALCULATION SHEET

Field Data: Date 05/23/07 Time 10:58

Head in Inches _____ = 1.60' ft.

Type & Size of Primary Flow Measurement Device 8 foot Parshall flume

Name & Model of Secondary Flow Measurement Device Milltronics

Recorded Flow at date & time listed above 44.17 MGD

Flows are calculated from flow charts taken from the ISCO Open Channel Flow Measurement Handbook

1.60 ft. = 44.01 M.G.D./g.p.m.

% error = $\frac{\text{recorded value} - \text{calculated value}}{\text{calculated value}} \times 100$

% error = 0.3 less than 10% is ok

Further Details

In January 2007, a concerned citizen contacted the office of Congressman Rodney Alexander of Louisiana, concerning “black water” being discharge via a ditch into the Ouachita River by Georgia Pacific. When the complaint was received by the ADEQ, the Ouachita River was in flood stage below Felsenthal Lock and Dam. Since that time, the Ouachita River has been almost continually in a state of flood below Felsenthal Lock and Dam.

The facility does discharge processed wastewater effluent (around 40 millions gallons per day) into the Ouachita River just above the state line. The facility is authorized to discharge this effluent via the permit number above. The facility samples three places inside the mill prior to the wastewater entering the wastewater treatment system. The facility also samples at two places below wastewater system prior to discharge into the Ouachita River. Outfall 001 is located below the Aeration Stabilization Basin and is sampled three times per week. The effluent then flows via a ditch into Mossy Lake. The second monitoring point is SMS 002 which is at the discharge of Mossy Lake into Coffee Creek, which would be the “ditch” described by the concerned citizen. Coffee Creek then flows approximately 0.5 miles to the Ouachita River. The facility must sample for the permitted parameters at the SMS 002 three times per week. The facility is not required to sample when Mossy Lake is flooded by the Ouachita River (measured at 62’ or above at Felsenthal Lock and Dam) and for two weeks following the recession of the flood waters below 62 feet. Since the middle of January, the River has been moving in and out of flood stage continually. Because of the two week window to allow flood waters to recede out of Mossy Lake, the facility has only been required to take 6 samples in March and April at SMS 002. The facility has taken ALL required samples at the internal outfalls and Outfall 001.

The effluent that was being discharged on the day of the inspection was dark brown. This effluent was consistent with the characteristics of paper mill effluent which is generally dark brown, (hence the name of the creek, Coffee Creek).

For the month of December 2006, the Ouachita River had very little flow. Felsenthal Lock and Dam did not meet minimum flow requirements several days that month. Also, what excess water did come down the River was caught and held above the Lock and Dam for flooding of the green tree reservoir of Lake Jack Lee (Felsenthal NWR). The low flow for the month may have not allowed the effluent to mix with the River water causing a longer than normal mixing zone.

Section G, Outfall 001: The facility had foam present below Outfall 001, but this foam was not in a persistent nature and dissipated below the Outfall.

Section H: The facility removes sludge from the treatment plant via a clarifier for the pulp sewer and by the use of ash settling basins for the acid sewer. Both the sludge from the clarifier and ash basins are being used as fill material for closure of the old sludge pond. Also, ash from the settling basins is used for cover on the landfill (permitted by the ADEQ Solid Waste Division, Permit 292-S3N). As the solids are removed from the clarifier, they are dewatered by screw presses, then, the dewatered solids are trucked to the old sludge pond. As the solids are removed from the ash basins, they are dewatered by stock piling the solids beside the basins and allowed to dry. Then after a very large quantity of ash has accumulated, the facility transports the ash to the old sludge pond. (For more information, see the Permit fact sheet page 3, item 9.)



Ms. Karen Dickinson, Vice President
Georgia Pacific Corporation
P.O. Box 3333
Crossett, AR 71635

ADEQ

ARKANSAS
Department of Environmental Quality

May 31, 2007

Ms. Karen Dickinson, Vice President
Georgia Pacific Corporation
P.O. Box 3333
Crossett, AR 71635

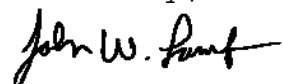
NPDES Permit No. AR0001210

Dear Ms. Dickinson:

On May 23, 2007, I performed a routine inspection of the Georgia Pacific Crossett Facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed that you are in compliance with terms of your permit.

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,



John W. Lamb
District Field Inspector
Water Division

cc: Enforcement Branch, Water Division
Permits Branch, Water Division

WATER DIVISION