

August 11, 2014

Mr. James W. Cutbirth, Environmental Affairs Manager Georgia Pacific, LLC Crossett Operations P.O. Box 3333 Crossett, AR 71635

## RE: Georgia Pacific, LLC-Crossett Inspection (Ashley Co) AFIN: 02-00013 NPDES Permit No.: AR0001210

Dear Mr. Cutbirth:

On July 29, 2014, I performed a Compliance Evaluation Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.

# No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments.

If I can be of any assistance, please contact me at <u>youngm@adeq.state.ar.us</u> or (501) 837-2073.

Sincerely,

Michael D. Young District 8 Field Inspector Water Division

					NI	CD	FCTIO			
			AFIN: 02-00013 PERMIT #: AR0001210							
								DATE: 7/29/2014		
А	RKANSAS		DUNTY: 02 Ashle				: 079183	MEDIA: WN		
Dep	partment of Environmental Quality		PS LAT: <b>33.14086</b>							
	FACILITY INFORMAT	ION					ION INFOR	RMATION		
	orgia Pacific, LLC-Crossett			FACILITY TYPE: 2 - Industrial	-	NSPECTO	31 S - State			
	ossett			FACILITY EVALUATION RATING			Con	TION TYPE: npliance Evaluation		
-	ossett, AR			(-)	NTRY		EXIT TIME: 15:22	PERMIT EFFECTIVE DATE:		
NAME		CIAL	-	1/29/2014 0	9.,	30	13.22	9/30/2010 PERMIT EXPIRATION DATE:		
	James W. Cutbirth / Environme	nta	I Affairs					10/31/2015		
Ма	nager			FAYETTEVILLE	S	HALE	E RELATED	): <b>N</b>		
COM	PANY:			FAYETTEVILLE	S	HALE		DNS: <b>N</b>		
							ION PART	CIPANTS		
	ossett Operations P.O. Box 3333			NAME/TITLE/PHONE/FAX/EMA			ronmental	Engineer/870-567-		
	state, zip: DSSett AR 71635			Rachel Johnson/ Environmental Engineer/870-567- 8170						
	JE & EXT: / FAX:									
	D-567-8144 /									
EMAII	<u></u>									
CC	NTACTED DURING INSPECTION	Ye	S							
	2-21	atisfar	AREA EVA ctory, M=Marginal, U=Unsati		/Eva	alustod)				
S	PERMIT	S	FLOW MEASUF				STORMW	ATER		
S	RECORDS/REPORTS	S	LABORATORY			S	FACILITY	SITE REVIEW		
S	<b>OPERATION &amp; MAINTENANCE</b>	S	EFFLUENT/REC	CEIVING WATER		S	SELF-MO	DNITORING PROGRAM		
S	SAMPLING	S	SLUDGE HAND	LING/DISPOSAL		Ν	PRETREA	TMENT		
S	OTHER:									
			SUMMARY C	OF FINDINGS						
No	violations observed during inspe	ectio	on.							
	GENERAL COMMENTS									
	nn	10	•							
INS	SPECTOR'S SIGNATURE:	Michael D. Y	Young			DATE: <b>08/07/2014</b>				
	INSPECTOR'S SIGNATURE: Michael D. Young DATE: 08/07/2014									
	إلعا	רי	~ Pl Cal	~			<b></b>			
SU	PERVISOR'S SIGNATURE:			Kerri McCabe				DATE: 8/8/2014		

Inspection Report: Georgia Pacific, LLC-Crossett, AFIN: 02-00013, Permit	[#: AR0001210
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	L
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🖾ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆m 🗇u 🗇na 🗇ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🖾ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🖾ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🗇na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🗇na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🖙 🗆 u 🗆 na 🗆 ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Parshall Flume (001)/Rectangular Weir (SMS)	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED <u>&gt;</u> 10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED <a href="https://www.spikeline.com">https://www.spikeline.com</a> OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Test America/Environ/Analytical Perspectives	
b. LAB ADDRESS: Mobile, AL/Brentwood, TN/Wilmington, NC	
c. PARAMETERS PERFORMED: <u>Chlorinated Phenols, AOX, Metals, Nutrients, Chloroform and Pesticides/WET Testing/Dioxin</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy On Ona One

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS												
BASED ON VISUAL OBSERVATIONS ONLY 🛛 S 🗆 M 🗆 U 🗆 NA 🗠 NE												
DETAILS:												
OUTFALL #:     OIL SHEEN     GREASE     TURBIDITY     VISIBLE FOAM     FLOATING SOLIDS     COLOR     OTHER       001     N     N     Not Persistent     N     Brown												
001	N	N	N	Not Persistent	N	Brown						
SMS	N	N	N	Not Persistent	N	Brown						
SECTION H: SLUDGE DISPOSAL												
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS 🛛 S 🗆 M 🗆 U 🗆 NA 🗆 NE												
DETAILS:												
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m						
2. SLUDGE R	ECORDS MAINTAINE	DAS REQUIRED BY 40	) CFR 503:			⊠s ⊡m						
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):							
SECTION I:	SAMPLING IN	SPECTION PRO	OCEDURES									
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ØNA ⊡NE					
DETAILS:												
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	On Øna One					
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:								
3. SAMPLES	PRESERVED:						⊡n Øna ⊡ne					
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:										
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:									
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:									
7. SAMPLE SI	PLIT WITH PERMITTEI	Ξ:										
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:										
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	On Øna One					
	STORM WAT											
	ATER MANAG	EMENI MEEI	S PERMIT RE	QUIREMENTS		⊠S ⊔M L						
DETAILS:						<b>1</b>	<u> </u>					
	DATED AS NEEDED:											
	NCLUDING ALL DISCH		CE WATERS:									
	N PREVENTION TEAM		A.									
	N PREVENTION TEAM		):									
	5. LIST OF POTENTIAL POLLUTANT SOURCES:											
	TENTIAL SOURCES A											
		AKGES AKE AUTHOR										
	RUCTURAL BMPS:	<u>.</u>										
							□n □na □ne □n □na □ne					
	PERLY OPERATED AI											
TI. INGELOTIC	AND CONDUCTED AS											

# FLOW CALCULATION SHEET

OUTFALL 001												
Date: 07/	29/2014	Time: 13:	01									
Head in Inc	hes: <b>18.0</b> "	Feet:	1.5'									
Type & Size of Primary Flow Measurement Device: 8 Foot Parshall Flume												
Name & Model of Secondary Flow Measurement Device: Milltronics OCM II												
Date of last	Calibration of Se	econdary F	low Dev	ice:	12-16-20	13						
Recorded F	Flow at Date & Ti	me Listed A	Above:	38.1	6 MGD	(Facility Flow Meter	·)					
Coloulated	Flow at Data 9 T	"ins a lista d	Above	20								
	Flow at Date & T ted using flow charts in:				.68 MGD	pook-5 <sup>th</sup> Edition)						
				<u>v ivicas</u>								
% Error =	Recorded Valu	e - Calo	- Calculated Value									
70 EII0I =	Calo	culated Val										
	20.05		20.69									
% Error =	38.25	39.68	-   <u>39.68</u>									
		39.00										
0/ 5		V 400										
% Error =		X 100	X 100									
	1		1									
% Error =		X 100										
% Error =	3.6	%										
70 Enor =	0.0	70										
Comments	·											

# FLOW CALCULATION SHEET

SMS Monit	oring	Station						
	00/004	4	Times	00				
Date: 07/	29/201	4	Time: <b>14</b> :	03				
Head in Inc	hes <sup>.</sup>	13.44	Feet:	1.12				
	103.	10.44	1001.	1.12		<u></u>		
Type & Size	e of Pr	imary Flov	w Measurer	nent De	vice	: 18 Foot Red	tangu	ular Weir w/o
contraction							Ũ	
						·		
Name & Mo	odel of	Seconda	ry Flow Mea	asureme	ent D	evice: Tota	lizer	
Date of last	Calibr	ration of S	econdary F		vice.	12-12-201	3	
	Calibi					12-12-201	5	
Recorded F	low at	Date & T	ime Listed	Above:	42.	79 MGD		(Facility Flow Meter)
					· · · · ·			
			Time Listed			5.9 MGD	, eth e	- 11/1 )
Flow is calculat	ed using	flow charts in	n: <u>ISCO Open C</u>	hannel Flo	w Mea	asurement Handbo	<u>ok-5" E</u>	<u>-dition)</u>
	Reco	orded Valu	le - Cal					
% Error =		Ca	Iculated Val					
% Error =		42.79	-	45.9		— X 100 –		
			45.9			X 100		
% Error =			— X 100					
% Error =			X 100					
% Error =		6.7	%					
Comments:								

#### **DMR Calculation Check**

Reporting Period:	From	<u>2013</u> Year	01 Month	01 Day	_ To _	2013 Year	01 Month	<u>31</u> Day		
Parameter Checked:	_0	BOD₅ utfall 001	-							
		Loading Mass		Concentration Monthly						
	Mo.	Mo. Avg Ibs/day			<b>vg.</b> - r	ng/l	7-day Avg mg/l			
Reported Value:		13,311			38.0		71.8			
Calculated Value:	13,311			38.0			71.8			
Permit Value:		24,155.4			64.4		123.	8		

If calculated value does not equal reported value, explain: <u>Equal</u>

#### **DMR Calculation Check**

Reporting Period:	From	2013 Year	01 Month	01 Day	_ To	2013 Year	01 Month	31 Day			
		. •••						,			
		TSS									
		Outfall:									
Parameter Checked:		SMS-A	_								
		Loading				Concer	tration				
		Mass Mo. Avg Ibs/day			Monthly						
	Mo.				Mo. Avg mg/l 7-day			mg/l			
Reported Value:		4,470			9		12				
Calculated Value:		4,470			9		12				
Permit Value:		18,000		R	eport		Repo	ort			

If calculated value does not equal reported value, explain: <u>Equal</u>

#### **DMR Calculation Check**

Reporting Period:	From	2013 Year	06 Month	01 Day	_ To _	2013 Year	06 Month	<u>30</u> Day		
Parameter Checked:	0	TSS utfall 001	-							
		Loading Mass		Concentration Monthly						
	Mo.	Mo. Avg Ibs/day			<b>\vg.</b> - r	ng/l	7-day Avg mg/l			
Reported Value:		6,849			19		32			
Calculated Value:	6,849			19			32			
Permit Value:	ermit Value: <u>37,720</u>				119.6		222.4			

If calculated value does not equal reported value, explain: <u>Equal</u>