

ADEQ

ARKANSAS
Department of Environmental Quality

April 13, 2016

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 April 6, 2016, I performed a Reconnaissance 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. A 24-hour and 5-day report was submitted to ADEQ Water Division Enforcement Division concerning this flooding event (see attached). Please refer to the attached inspection report for any comments.

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

Sincerely,



Michael D. Young
District 8 Field Inspector
Water Division



ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: 02-00013	PERMIT #: AR0001210	DATE: 4/6/2016
COUNTY: 02 Ashley	PDS #: 090207	MEDIA: WN
GPS LAT: 33.138517 LONG: -91.979876 LOCATION: General Area		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: Georgia Pacific, LLC-Crossett LOCATION: Crossett CITY: Crossett, AR	FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 101531 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Reconnaissance
	DATE(S): 4/6/2016 ENTRY TIME: 13:08 EXIT TIME: 14:22 PERMIT EFFECTIVE DATE: 9/30/2010 PERMIT EXPIRATION DATE: 10/31/2015
RESPONSIBLE OFFICIAL	
NAME / TITLE: Mr. James W. Cutbirth / Environmental Affairs Manager COMPANY: Georgia Pacific, LLC MAILING ADDRESS: Crossett Operations P.O. Box 3333 CITY, STATE, ZIP: Crossett AR 71635 PHONE & EXT: / FAX: 870-567-8144 / EMAIL:	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N
CONTACTED DURING INSPECTION: No	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Rachel Johnson/ Environmental Engineer/870-567-8170 Sarah Ross/Environmental Manager/870-567-8170

AREA EVALUATIONS

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

S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	S	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS


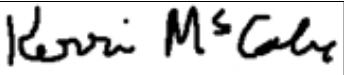
No violations observed at time of Reconnaissance Inspection.

GENERAL COMMENTS

On April 6, 2016 I contacted Rachel Johnson, Environmental Engineer with Georgia-Pacific Crossett, LLC, in her office. I informed Ms. Johnson that I was at the facility in regards to a complaint of concerns of contaminated storm runoff from a rain event on March 9-10, 2016. The flooding event and any permit violations related to the flooding event were self-reported by Georgia-Pacific to the ADEQ Water Division Enforcement Branch. The chain of e-mails regarding the reported event is attached to this report. Ms. Johnson contacted Sarah Ross, Environmental Manager with Georgia-Pacific Crossett, LLC, and Ms. Ross accompanied me and Ms. Johnson to the location of concern near Hancock Road on the west-side of the facility.

Ms. Ross and Ms. Johnson stated that on March 9, 2016 an unknown amount of stormwater and process water inundated an area that had not been observed to be flooded prior to this event. The G-P facility has two waste streams that exit the west-side of the facility. The P1 waste stream exits the facility and travels under Hancock Road and Highway 82 and is routed to the clarifier. The P3 waste stream exits the facility and travels parallel to P1 but bypasses the clarifier and travels directly to the ash settling basin. According to the e-mail to ADEQ Enforcement Branch, the area in Photo 1 was completely inundated and it is probable that untreated effluent commingled with stormwater and may have traveled off of G-P property (see Figure 1).

All concerns related to this flooding event need to be directed to the ADEQ Water Division Enforcement Branch.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 4/8/2016
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 4/12/2016


Water Division Photographic Evidence Sheet			
Location:	Georgia Pacific, LLC-Crossett		
Photographer:	Michael Young	Date:	04/06/2016
Time:	13:28		Photo #:
Witness:	Sarah Ross; Rachel Johnson		1
Description:	Image from gate on Hancock Road looking east toward GP facility. P1 and P3 sewer locations are indicated. Blue shading is area stated to be under water.		
			

Figure 1. Overview of area directly west of Georgia-Pacific Crossett, LLC. The P1 and P3 sewer channels are labeled with arrows and the area shaded in blue was the area that was stated to have some inundation from flooding. It was unknown if commingled stormwater and untreated effluent made it off G-P property.



From: [Johnson, Rachel M. \(Crossett\)](#)
To: [Pemberton, Layne](#)
Cc: [Ross, Sarah M.](#)
Subject: RE: Georgia-Pacific Crossett LLC - NPDES Permit #AR0001210
Date: Thursday, March 10, 2016 5:21:07 PM
Attachments: [image001.png](#)

Mr. Pemberton,

In addition to our notification below, Georgia-Pacific Crossett Paper Operations has continued to experience higher than normal flows due to extremely heavy rains and flooding conditions. Effluent flow from Outfall 001 could not be measured this morning for the previous 24 hours due to the fact that the water level had flooded over the flow measuring device and outside the flume structure. Samples were collected for BOD and TSS; however, accurate mass loading calculations cannot be made since flow cannot be measured. Also, we have reason to believe that effluent and excess stormwater from the area may have overflowed the sewer collection system just before entering the enclosed the pipeline which goes under Hancock Road and Hwy 82 in Crossett.

There were no overflows from the North Landfill's leachate collection system observed this morning; however, the leachate collection system from the facility's East Landfill had begun to overflow, so we collected a stormwater sample and results will be reported to you as soon as they are available.

The heavy rains are continuing and expected to continue into the weekend. The rains have flooded completely many areas: based on our local rain gauge located at our Technical Center, the area has experienced ~13 inches of rain since Tuesday.

Once again, please free to contact me if you have any additional questions or concerns.

Rachel M. Johnson
Environmental Engineer
Crossett Paper Operations
(870) 567-8170

From: Johnson, Rachel M. (Crossett)
Sent: Wednesday, March 09, 2016 5:55 PM
To: 'Pemberton, Layne (PEMBERTON@adeq.state.ar.us)'
Cc: Ross, Sarah M.
Subject: Georgia-Pacific Crossett LLC - NPDES Permit #AR0001210

Mr. Pemberton,

I am sending this email in follow up to our phone conversation earlier today. Georgia-Pacific Crossett LLC (NPDES Permit #AR0001210) did have an unpermitted discharge beginning this morning following a very large storm event. The mill's North Landfill has a leachate collection system which collects leachate from the active cell of the landfill and pumps it back to the wastewater treatment system for treatment. Due to the extremely heavy rains we are receiving in the area, the leachate system was overwhelmed with stormwater this morning and overflowed the berm on the north west corner of the landfill cell (in the area designated on the attached aerial photo). This water will

flow across a large open field before eventually flowing to an unnamed tributary of Brushy Creek. Samples have been collected and results will be reported to you as soon as they are available. At this time we do not believe it poses any impacts to health or the environment due to the heavy rains and high flows in the streams in the area.

Please free to contact me if you have any additional questions or concerns.

Rachel M. Johnson
Environmental Engineer
Crossett Paper Operations
(870) 567-8170

