

ADEQ

ARKANSAS
Department of Environmental Quality

October 5, 2018

Michael L. Hohnadel, Vice Pres. of Manufacturing
Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations
P.O. Box 3333
Crossett, AR 71635

RE: Georgia-Pacific Consumer Opera Inspections (Ashley Co)
AFIN: 02-00013 **NPDES Permit No.: AR0001210**
ARR00A776

Dear Mr. Hohnadel:

On August 24, 2018, I performed a Compliance Evaluation Inspection and Industrial Stormwater 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. Copies of the inspection reports are enclosed for your records.


Please refer to the “Summary of Findings” section of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Office of Water Quality Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by **October 19, 2018**.

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

Sincerely,



Michael Young
District 8 Field Inspector
Office of Water Quality

 A R K A N S A S Department of Environmental Quality	WATER DIVISION INSPECTION REPORT		
	AFIN: 02-00013	PERMIT #: AR0001210	DATE: 8/24/2018
	COUNTY: 02 Ashley	PDS #: 104794	MEDIA: WN
	GPS LAT: 33.136393 LONG: -91.967238 LOCATION: Entrance		
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: Georgia-Pacific Consumer Operations LLC – Crossett Paper Operations LOCATION: 100 Mill Supply Road CITY: Crossett, AR		FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 101531 S - State FACILITY EVALUATION RATING: 2 - Marginal INSPECTION TYPE: Compliance Evaluation DATE(S): 8/24/2018 ENTRY TIME: 10:12 EXIT TIME: 17:10 PERMIT EFFECTIVE DATE: 11/1/2010 PERMIT EXPIRATION DATE: 10/31/2015	
RESPONSIBLE OFFICIAL		FAYETTEVILLE SHALE RELATED: N	
NAME / TITLE: Michael L. Hohnadel / Vice Pres. of Manufacturing COMPANY: Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations MAILING ADDRESS: P.O. Box 3333 CITY, STATE, ZIP: Crossett AR 71635 PHONE & EXT. / FAX: 870-567-8310 / 870-364-9076 EMAIL: Michael.Hohnadel@gapac.com		FAYETTEVILLE SHALE VIOLATIONS: N	
CONTACTED DURING INSPECTION: Yes		INSPECTION PARTICIPANTS	
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Rachel Johnson/GP Environmental Engineer/870-567-8170/Rachel.JOHNSON2@GAPAC.com Sarah Ross/GP Environmental Manager (closing meeting)/870-567-8170 Michael Hohnadel/GP Vice President of Manufacturing (closing meeting)/870-567-8170	
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
S	PERMIT	S	FLOW MEASUREMENT
S	RECORDS/REPORTS	S	LABORATORY
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL
**	OTHER:	S	STORMWATER
		S	FACILITY SITE REVIEW
		S	SELF-MONITORING PROGRAM
		S	PRETREATMENT
SUMMARY OF FINDINGS			
1.) During the inspection, I observed truck washing of dump trucks carrying pressed sludge in a manner that was not consistent with stormwater Best Management Practices (BMPs) found in the Stormwater Pollution Prevention Plan (SWPPP) for this facility (see Photo 7-8). This is a violation of permit condition Part II. (16.). 2.) The facility is not documenting slope when completing pH calibration (see Photo 1). This is a violation of permit condition Part III. (C.) (3.).			

GENERAL COMMENTS


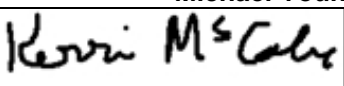
On August 24, 2018, I performed an inspection with the above participants. Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations manufactures paper products and has a discharge of ~40 MGD at Outfall 001. Permitted outfalls at this facility are three internal outfalls (Outfalls 101-103), Outfall 001, and a Stream Monitoring Station (SMS) 002. The treatment design for this facility is influent enters the WWTP (see Photo 3) and there is a chemical addition of Hydrogen Peroxide (see Photo 5) followed by a bar screen for fiber removal (see Photo 4). Primary treatment is in the clarifier (see Photo 6). Sludge is removed from the clarifier and passed through a belt press to be hauled by trucks to a permitted landfill site (see Photo 7-8). A temporary variance has been granted to abandon the use of the ash settling basins (see Photo 11) and an additional temporary variance has permitted for the use of oxygen diffusion into the wastewater stream after the clarifier (see Photo 12). Nutrient addition is used when needed (see Photo 13), and wastewater then enters the aeration stabilization basin (ASB) (see Photo 15) where there are feeds of additional wastewater bioaugmentation supplements (see Photos 14; 16). Monitoring is performed at Outfall 001 (see Photo 18) and flow is monitored using a totalizer (see Photo 17). Chemical addition of defoamer takes place at Outfall 001 (see Photo 19). Wastewater then enters the polishing pond (~640 acre Mossy Lake) and is monitored at SMS 002 (see Photo 20). The discharged water enters Coffee Creek and is discharged at the Ouachita River (see Photos 21-22). A records review and facility inspection were performed during this CEI.

Records Review:

During the inspection, I requested documentation including Chains of Custody (COCs), laboratory bench sheets, and flow records for all outfalls. The documentation was deemed complete without any errors or issues. The facility performs analysis on BOD5, TSS, pH, and DO and methods of these analyses were reviewed and found to be consistent with the current required methods. Calibration information for the pH meter was deemed to be incomplete because the facility is not documenting the slope of the pH meter (see Photos 1-2). From the manufacturer’s manual, “The meter will display the calibration summary including the slope and export the data to the calibration log;” therefore, the slope must be documented. Also reviewed was a Stormwater Pollution Prevention Plan (SWPPP) developed for permit condition Part II. (16.).

Facility Inspection:

During the inspection, I identified all of the required treatment devices to be in operation. At the location of the clarifier, I observed truck washing of dump trucks full of pressed sludge (see Photos 9-10) that was inconsistent with the control of runoff and stormwater exposure in the SWPPP. There were no other compliance issues identified during this inspection.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 9/26/2018
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 10/4/2018

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E1: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>Internal outfall 101-103</u>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>None</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Calculated flow</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E2: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>Outfall 001</u>	
10. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>Parshall flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Totalizer</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
16. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
17. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
18. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E3: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>SMS 002</u>	
19. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>Parshall flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
20. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
21. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Totalizer</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
22. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
23. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
24. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
25. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
26. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
27. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>GP Lab performs analysis on BOD5, TSS, pH, and TRC (for WET testing).</u>	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Summit Environmental Technologies/Environ/American Interplex/Test America</u>	
b. LAB ADDRESS: <u>3310 Win Street Cuyahoga Falls, OH 44223/Brentwood, TN/Savannah, GA</u>	
c. PARAMETERS PERFORMED: <u>AOX, Dioxin, Chloroform, Chlorinated Phenolics/WET Testing/Metals, Nutrients, Pesticides/Color</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

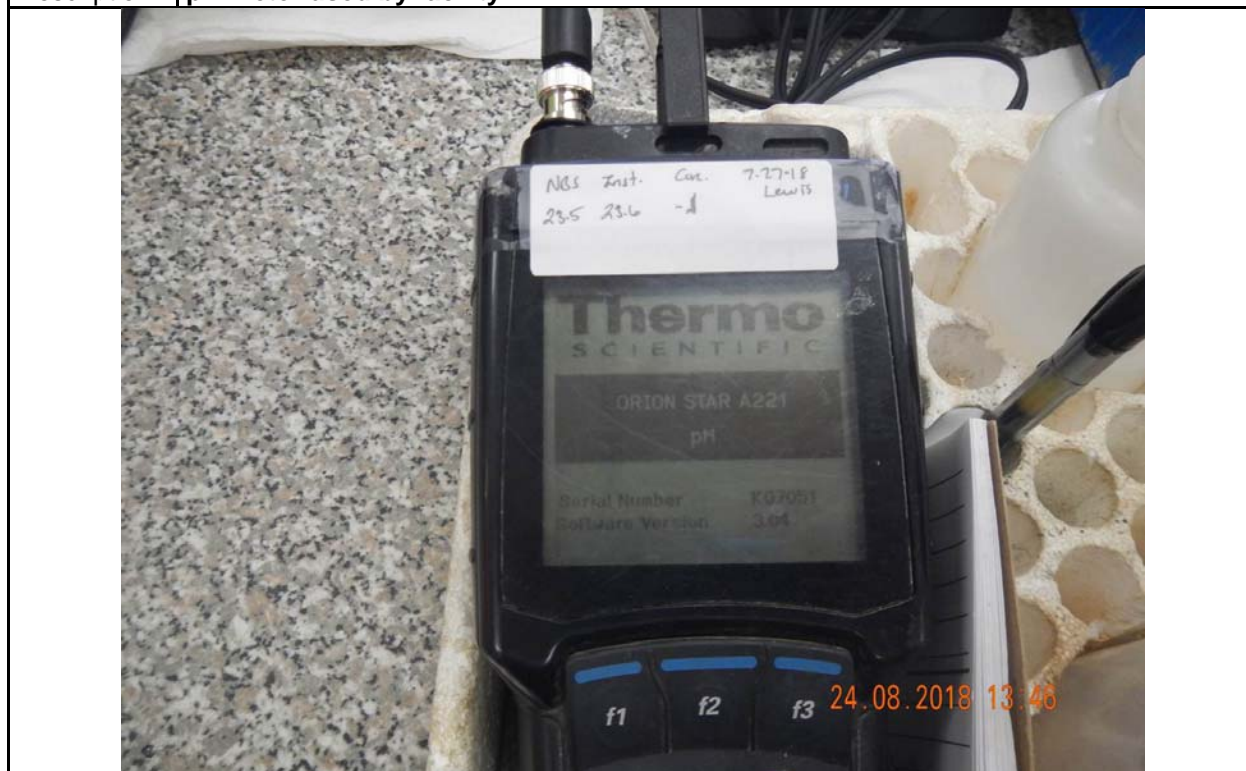
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
Internal outfall 101-103							No Discharge
Outfall 001	No	No	No	No	No	Dark tannic brown	
SMS 002	No	No	No	No	No	Dark tannic brown	
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE: <u>7/1/2018</u>						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	

FLOW CALCULATION SHEET

FLOW CALCULATION SHEET				
Outfall 001				
Date:	8/24/2018	Time:	14:55	
Head in Inches:	19.2"	Feet:	1.60'	
Type & Size of Primary Flow Measurement Device: 8 foot Parshall flume				
Name & Model of Secondary Flow Measurement Device:				Totalizer
Date of last Calibration of Secondary Flow Device:				Weekly
Recorded Flow at Date & Time Listed Above:			44.0009	(Facility Flow Meter)
Calculated Flow at Date & Time Listed Above:			44.02	
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5th Edition</u>)				
% Error =	Recorded Value	-	Calculated Value	X 100
	Calculated Value			
% Error =	44.0009	-	44.02	X 100
	44.02			
% Error =	-0.0191	X 100		
	44.02			
% Error =	0.0004	X 100		
% Error =	0.04	%		
Comments:				

Water Division Photographic Evidence Sheet			
Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	08/24/2018
Witness:		Time:	13:46
		Photo #:	1
Description:	pH calibration sheets maintained by facility. Note no slope documented.		

Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	13:46
		Photo #:	2
Description:	pH meter used by facility.		



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:20
		Photo #:	3
Description:	Raw influent entering WWTP.		



Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:21
		Photo #:	4
Description:	Fiber bar screen device.		



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:22
		Photo #:	5
Description:	Peroxide storage tank.		



Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:22
		Photo #:	6
Description:	Image of clarifier.		



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:24
		Photo #:	7
Description:	Sludge belt press and dump trucks for transfer.		



Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:25
		Photo #:	8
Description:	Sludge after being processed in belt press.		



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Time:	14:27	Witness:	
Photo #:	9	Description:	Location used for washing down dump trucks full of pressed sludge.



Photographer:	Michael Young	Date:	8/24/2018
Time:	14:27	Witness:	
Photo #:	10	Description:	Runoff from washing trucks entered wooded area.



Water Division Photographic Evidence Sheet			
Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Time:		Photo #:	11
Witness:			
Description:	Facility has temporarily ceased use of ash basins through temporary variance.		
			
Photographer:	Michael Young	Date:	8/24/2018
Time:		Photo #:	12
Witness:			
Description:	Diffuser is used to administer oxygen to wastewater stream.		
			

Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:40
		Photo #:	13
Description:	Nutrient storage tank.		



Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:46
		Photo #:	14
Description:	Wastewater supplement feeder.		



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Time:	14:46	Witness:	
Photo #:	15	Description:	Aerators were in operation during inspection.



Photographer:	Michael Young	Date:	8/24/2018
Time:	14:47	Witness:	
Photo #:	16	Description:	Wastewater bioaugmentation supplement.




Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	14:55
		Photo #:	17
Description:	Totalizer readout at Outfall 001.		





Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	15:00
		Photo #:	18
Description:	Discharge from Outfall 001.		



Water Division Photographic Evidence Sheet			
Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	15:00
		Photo #:	19
Description:	Defoamer feed tank.		
			

Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	15:34
		Photo #:	20
Description:	SMS 002 outfall.		



Water Division Photographic Evidence Sheet			
Location:	Georgia-Pacific Consumer Opera		
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	15:50
		Photo #:	21
Description:	Discharge from SMS 002 Outfall.		
			
Photographer:	Michael Young	Date:	8/24/2018
Witness:		Time:	15:44
		Photo #:	22
Description:	Discharge from Coffee Creek entering Ouachita River.		
			



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

October 6, 2016

Water Division – Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Crossett LLC
NPDES Permit # **AR0001210**

Dear Sir or Madam:

On September 7, 2016, Michael Young, District 8 Field Inspector, performed an inspection of the Georgia-Pacific Crossett Paper Operations' - NPDES Permit # **AR0001210**. Two findings were noted during the inspection and were included in the written report dated September 22, 2016. Please see below for a response to each finding.

Finding 1. Samples collected at Outfall 001 are transported to the laboratory without being maintained at 6°C for the entirety of transport. This is a violation of 40 CFR 136 Table II footnote 2.


Response to Finding 1. Coolers of ice have been utilized in transporting samples back to the lab since the date of the inspection. Sampling procedures have been updated to include the transportation of samples on ice for all samples collected at Outfall 001. This will ensure that samples are maintained at 6°C or less.

Finding 2. Flow is being reported as a calculated flow for Internal Outfalls 101, 102, and 103. The permitted sample type for these outfalls is instantaneous. This is a violation of permit condition Part III. (C.) (2.).

Response to Finding 2. This item had already been identified by the facility and has been addressed in the NPDES permit renewal process. A request was submitted to Loretta Reiber as part of our comments on the Pre-Draft Permit dated May 6, 2016 to allow calculated flow measurements from the Internal Outfalls 101, 102 and 103 in the renewal permit. Based on discussions with Ms. Reiber, the permit language will be revised to accommodate this request.

If you have any questions or need additional information, please feel free to contact Sarah Ross at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,


Michael L. Hohnadel
Vice President of Manufacturing
Crossett Paper Operations

cc: Michael Young



Georgia-Pacific Consumer Operations 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

October 19, 2018

Office of Water Quality Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations
NPDES Permit No. **AR0001210** AFIN 02-00013
Response to Inspection Report

Dear Sir or Madam:

On August 24, 2018, Michael Young, District 8 Field Inspector, performed an inspection of the Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations' (GP) NPDES Permit # **AR0001210**. Two findings were noted during the inspection and were included in the written report dated October 5, 2018. Please see below for a response to each finding.

Finding 1. During the inspection, I observed truck washing of dump trucks carrying pressed sludge in a manner that was not consistent with stormwater Best Management Practices (BMPs) found in the Stormwater Pollution Prevention Plan (SWPPP) for this facility (see Photo 7-8). This is a violation of permit condition Part II. (16.).

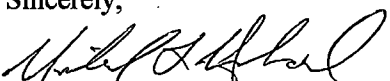
Response to Finding 1. This activity was stopped immediately until a more appropriate place for vehicle washing can be identified, designed and installed.

Finding 2. The facility is not documenting slope when completing pH calibration (see Photo 1). This is a violation of permit condition Part III. (C.) (3.).

Response to Finding 2. Since the date of the inspection, pH calibration slopes have been documented on the updated calibration log forms; however, GP has not been able to find a requirement to document the slope specified in the method or the AR rules.

If you have any questions or need additional information prior to this, please feel free to contact Sarah Ross at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,


Michael L. Hohnadel
Vice President of Manufacturing

cc: Michael Young



Georgia-Pacific Consumer Operations LLC
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October 19, 2018

Office of Water Quality Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations
NPDES Permit No. **AR00A776** AFIN 02-00013
Response to Inspection Report

Dear Sir or Madam:

On August 24, 2018, Michael Young, District 8 Field Inspector, performed an inspection of the Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations' (GP) NPDES Permit # **ARR00A776**. Two findings were noted during the inspection and were included in the written report dated October 5, 2018. Please see below for a response to each finding.

Finding 1. During the inspection, I identified an area of stormwater runoff allowing pollutants to be discharged offsite (see Photos 1-6). This is a violation of permit conditions Parts 3.1.1., 3.1.3., and 3.1.6.


Response to Finding 1. It was found that the berm at the entrance of the facility's North Landfill had been worn down by truck traffic. This berm has since been repaired and the drainage canal around the landfill has been cleaned of built up silt, so that runoff will be collected in the landfill's leachate collection system. See Photo 1 attached. This area will be added to quarterly inspections and maintained as necessary to prevent reoccurrence.

Finding 2. Silt fencing was improperly installed and maintained (see Photos 1; 3). This is a violation of permit condition Part 7.17.1.

Response to Finding 2. This silt fencing has since been removed. This area will be monitored monthly and, if necessary, more appropriate BMPs will be added (i.e. rock check dams).

If you have any questions or need additional information prior to this, please feel free to contact Sarah Ross at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,


Michael L. Hohnadel
Vice President of Manufacturing

cc: Michael Young

Photo 1.



00070
00200

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 City CROSSETT State AR ZIP 71635

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