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Georgia-Pacific LLC
Consumer Products

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October 25, 2012

Mr. Craig Uyeda
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

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

02-00013

Dear Mr. Uyeda:

Please find attached the 2nd Annual Progress Report, which addresses progress towards achieving the final effluent limits for Total Recoverable Copper, Total Recoverable Zinc and Dieldrin.

If you have any questions or need additional information, please feel free to contact me at (870) 567-8144 or by email at james.cutbirth@gapac.com.

Sincerely,

A handwritten signature in cursive script that reads 'James W. Cutbirth'.

James W. Cutbirth
Environmental Manager

Progress Report October 25, 2012

On September 30, 2010 Georgia-Pacific LLC's Crossett Paper Operations was granted coverage under the renewal NPDES Permit number AR0001210. The effective date of this permit was November 1, 2010. The new permit requires monitoring of Total Recoverable Copper, Total Recoverable Zinc and Dieldrin on an interim basis with compliance with final limits required three (3) years from the effective date.

Total Recoverable Copper

Over the past year, copper has been monitored at a minimum of once per month at SMS 002 except during flood conditions, when the compliance monitoring point becomes Outfall 001. The results of this monitoring are outlined in the table below. None of the samples collected since the effective date of the permit have been above the daily maximum limit that becomes effective November 1, 2013. Over the most recent year, only one sample result was above the monthly average concentration limit that becomes effective November 1, 2013, but this result was below the monthly average daily mass limit. To the best of our knowledge, copper is a trace contaminant of source materials, including influent water. We believe that no process or treatment changes will be necessary to comply with the final effluent limits for copper.

Date	Flow	Copper Conc. (ug/L)	Copper Mass (lb/day)	Location
Monthly Average limit		18.75	7.04	
Daily Max limit		37.62	14.12	
10/13/2011	29.4	4.8	1.18	SMS 002
10/13/2011	37.0	6.3	1.94	Outfall 001
11/15/2011	45.5	6.2	2.35	SMS 002
11/15/2011	31.1	21.0	5.45	Outfall 001
12/6/2011	77.1	6.0	3.86	SMS 002
12/6/2011	53.0	8.7	3.85	Outfall 001
1/2/2012	38.7	7.5	2.42	Outfall 001
2/1/2012	37.1	9.7	3.00	Outfall 001
3/19/2012	35.3	7.5	2.21	Outfall 001
4/23/2012	35.0	7.7	2.25	Outfall 001
5/22/2012	37.6	5.1	1.60	SMS 002
5/22/2012	42.3	6.1	2.15	Outfall 001
6/26/2012	28.1	2.8	0.7	SMS 002
6/26/2012	33.0	4.7	1.3	Outfall 001
7/26/2012	32.2	2.5	0.7	SMS 002
7/26/2012	34.2	5.1	1.5	Outfall 001
8/14/2012	17.5	4.9	0.7	SMS 002
8/14/2012	37.3	2.9	0.9	Outfall 001
9/13/2012	39.8	2.3	0.8	SMS 002
9/13/2012	34.0	5.0	1.4	Outfall 001

Total Recoverable Zinc

Over the past year, zinc has been monitored at a minimum of once per month at SMS 002 except during flood conditions, when the compliance monitoring point becomes Outfall 001. The results of this monitoring are outlined in the table below. During the past year, the daily maximum concentration limit that becomes effective November 1, 2013 has been exceeded three times and the maximum daily mass limit that becomes effective November 1, 2013 has been exceeded four times. The mill has initiated upstream sampling in an attempt to determine the source of zinc in the mill effluent. Zinc is a component of certain boiler fuels used at the Crossett facility. Ash from the boilers is sluiced into the mill's effluent, settled in the Ash Settling Basins and then removed mechanically from the Ash Settling Basins. Zinc levels in the treated effluent may be influenced by contact with the ash from certain fuels. The mill is currently making plans for not using certain of these boiler fuels that may be potential sources of zinc. Other than these measures, we believe that no process or treatment changes will be necessary to comply with the final effluent limits for zinc.

Date	Flow	Zinc Conc. (ug/L)	Zinc Loading (lb/day)	Location
Monthly Average limit		194.58	73.02	
Daily Max limit		390.41	146.52	
10/13/2011	29.4	180	44.1	SMS 002
10/13/2011	37.0	230	71.0	Outfall 001
11/15/2011	45.5	310	117.6	SMS 002
11/15/2011	31.1	610	158.2	Outfall 001
12/6/2011	77.1	280	180.0	SMS 002
12/6/2011	53.0	390	172.4	Outfall 001
1/2/2012	38.7	430	138.8	Outfall 001
2/1/2012	37.1	540	167.1	Outfall 001
3/19/2012	35.3	310	91.3	Outfall 001
4/23/2012	35.0	240	70.1	Outfall 001
5/22/2012	37.6	110	34.5	SMS 002
5/22/2012	42.3	250	88.2	Outfall 001
6/26/2012	28.1	100	23.4	SMS 002
6/26/2012	33.0	180	49.5	Outfall 001
7/26/2012	32.2	140	37.6	SMS 002
7/26/2012	34.2	290	82.7	Outfall 001
8/14/2012	17.5	260	37.9	SMS 002
8/14/2012	37.3	150	46.7	Outfall 001
9/13/2012	39.8	160	53.1	SMS 002
9/13/2012	34.0	340	96.4	Outfall 001

Dieldrin

Since the effective date of the permit the results from all monthly samples collected at SMS 002 and Outfall 001 have been non-detect for Dieldrin, therefore, no additional upstream monitoring has been conducted. We are not aware of any potential sources of dieldrin that could be in our treated effluent. Should there continue to be no detectable amounts of dieldrin in the effluent at SMS 002 during the interim period of the permit, we intend to request the removal of the final limits prior to May 1, 2013 as allowed by Part I.B.3 of the permit.

Date	Flow	Dieldrin Conc. (ug/L)	Dieldrin Loading (lb/day)	Location
Monthly Average limit		0.00091	0.00034	
Daily Max limit		0.00284	0.0011	
10/13/2011	29.4	<0.0076	<0.0019	SMS 002
11/15/2011	45.5	<0.0076	<0.0029	SMS 002
12/6/2011	77.1	<0.0077	<0.0050	SMS 002
1/2/2012	38.7	<0.0073	<0.0024	Outfall 001
2/1/2012	37.1	<0.0075	<0.0023	Outfall 001
3/19/2012	35.3	<0.0076	<0.0022	Outfall 001
4/23/2012	35.0	<0.013	<0.0038	Outfall 001
5/22/2012	37.6	<0.013	<0.0041	SMS 002
6/26/2012	28.1	<0.013	<0.0030	SMS 002
7/26/2012	32.2	<0.012	<0.0032	SMS 002
8/14/2012	17.5	<0.012	<0.0018	SMS 002
9/13/2012	39.8	<0.012	<0.0040	SMS 002

Summary

We do not foresee the need to undertake any additional studies at this point to meet the final limits that become effective on November 1, 2013. We also do not foresee the need at this point for any additional treatment, modifications or construction that would require a request from the ADEQ for approval.