

## Harbin, Danielle

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**From:** Ross, Sarah M <Sarah.Ross@GAPAC.com>  
**Sent:** Wednesday, August 4, 2021 1:51 PM  
**To:** Healey, Richard; Harbin, Danielle  
**Cc:** Johnson, Rachel M  
**Subject:** AFIN 02-00013 Permit AR0001210 Comprehensive Review  
**Attachments:** AFIN 02-00013 Permit No. AR0001210 Comprehensive Review 2021 July.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AFIN 02-00013

Permit No. AR0001210

Facility: Georgia Pacific Consumer Operations LLC – Crossett Paper Operations, Crossett, Arkansas

Mr. Healey

To follow-up on our telephone conversation the morning of Wednesday, July 14, 2021 and the follow-up email from Rachel Johnson (GP) to Danielle Harbin (ADEQ) that afternoon, we would like to provide additional updates on our follow-up actions as listed in our letter dated June 30, 2021 written in response to your June 3, 2021 letter:

- A thorough independent third-party laboratory review has been scheduled for August 2021.
- Results from the first and second split BOD sample analysis were received from American Interplex. These results will be reflected in the July 2021 DMR.
  1. The July 21, 2021 American Interplex result was 24 mg/L vs. 23 mg/L from the mill's internal laboratory.
  2. The July 28, 2021 American Interplex result was 18 mg/L vs 19.7 mg/L from the mill's internal laboratory.
- A comprehensive review was completed to assess BOD compliance over the five year look back period and is attached in the [AFIN 02-00013 Permit No. AR0001210 Comprehensive Review 2021 July.pdf](#) file. The analysis is presented in four (4) pages as described below:
  1. Outfall 001 – Chart: A comparison of BOD results versus discharge limits that only includes days when the GGAs were completed for Outfall 001.
  2. SMS 002 – Chart: A comparison of BOD results versus discharge limits that only includes days when the GGAs were completed for SMS 002.
  3. GGA – Chart1: Provides GGA results versus upper and lower limits (83% of GGAs over entire period were within the acceptable range).
  4. Summary of Results: To provide better context concerning the consistency of our results, we thought it would be useful to evaluate BOD results from two representative periods prior to and post pulp mill shutdown. The review included both Outfall 001 (first week of every month) and SMS 002 (days when not flooded). The purpose was to see if we could draw any correlations from the BOD results from those days where the GGA was done and the days when it was not. While this data represents a snapshot to some degree, we believe it provides support for our belief that the data from the non GGA days can be considered valid and accurate.

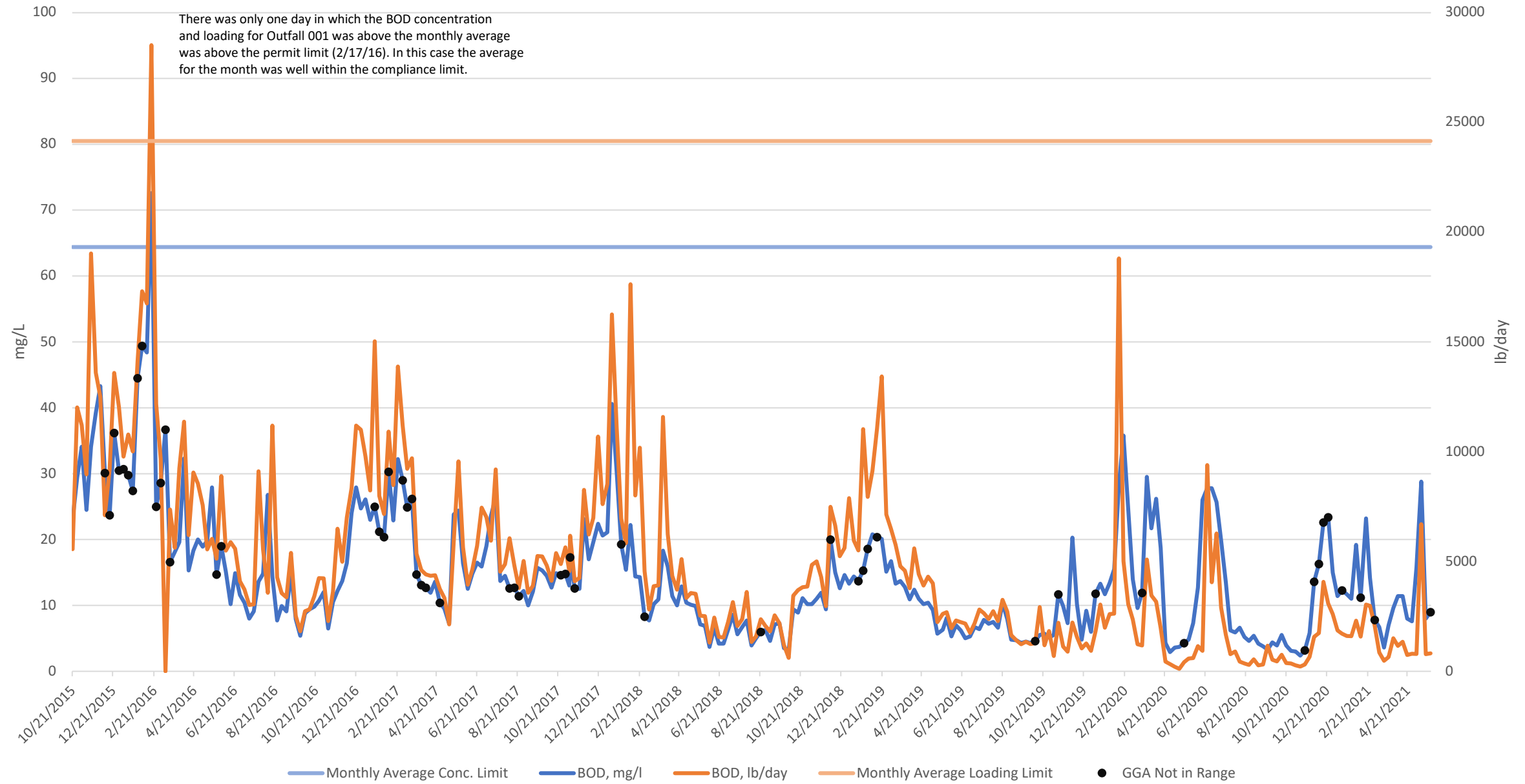
We would like to walk you through how we pulled this information together and explain the results so please let me know a convenient time.

Sincerely,  
Sarah Ross, PE (AR)(GA)  
Environmental & Compliance Leader

Georgia-Pacific Consumer Operations LLC – Crossett Paper Operations  
[Sarah.Ross@gapac.com](mailto:Sarah.Ross@gapac.com) or Office (870) 415-6363

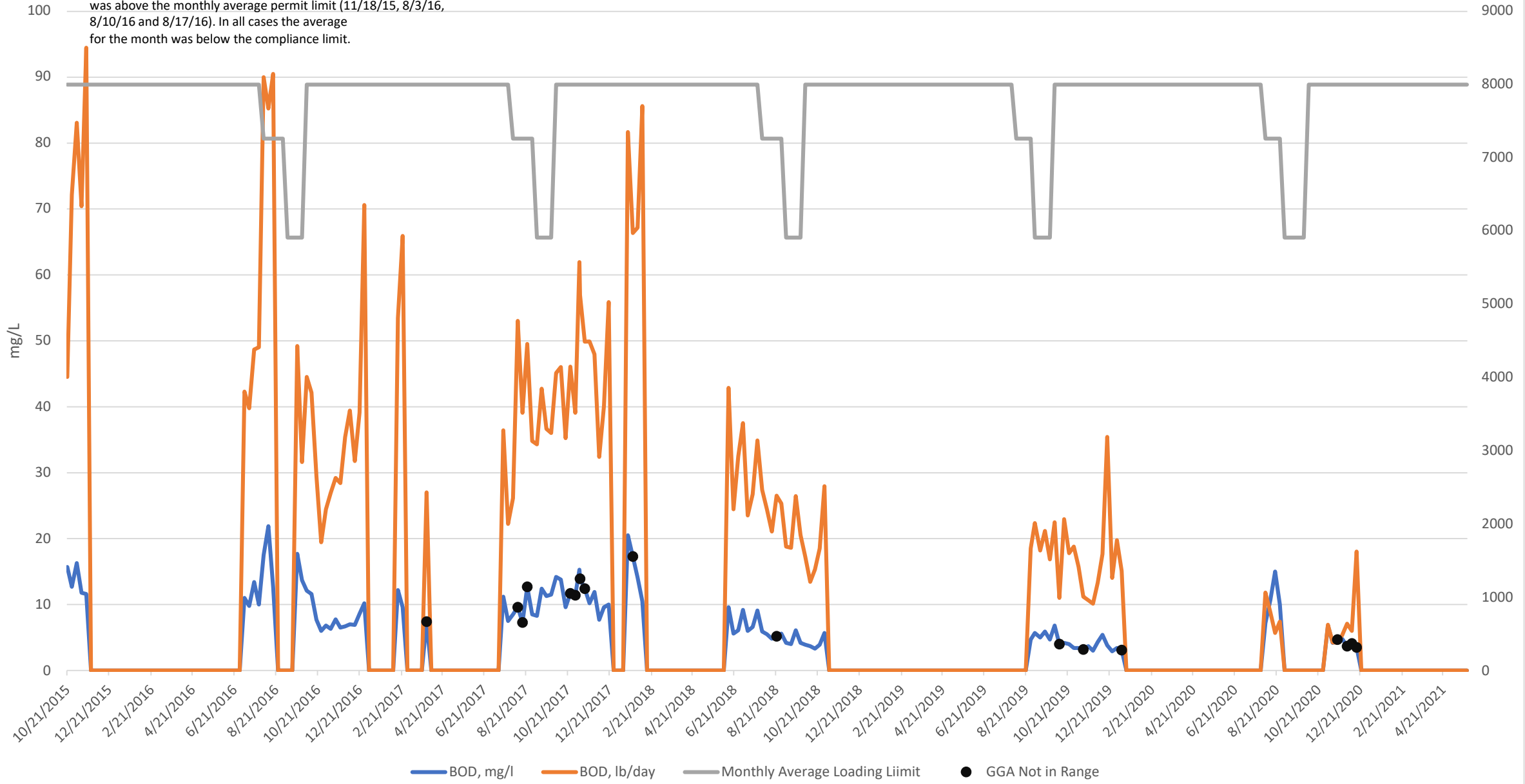
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### Outfall 001 (GGA Days Only)

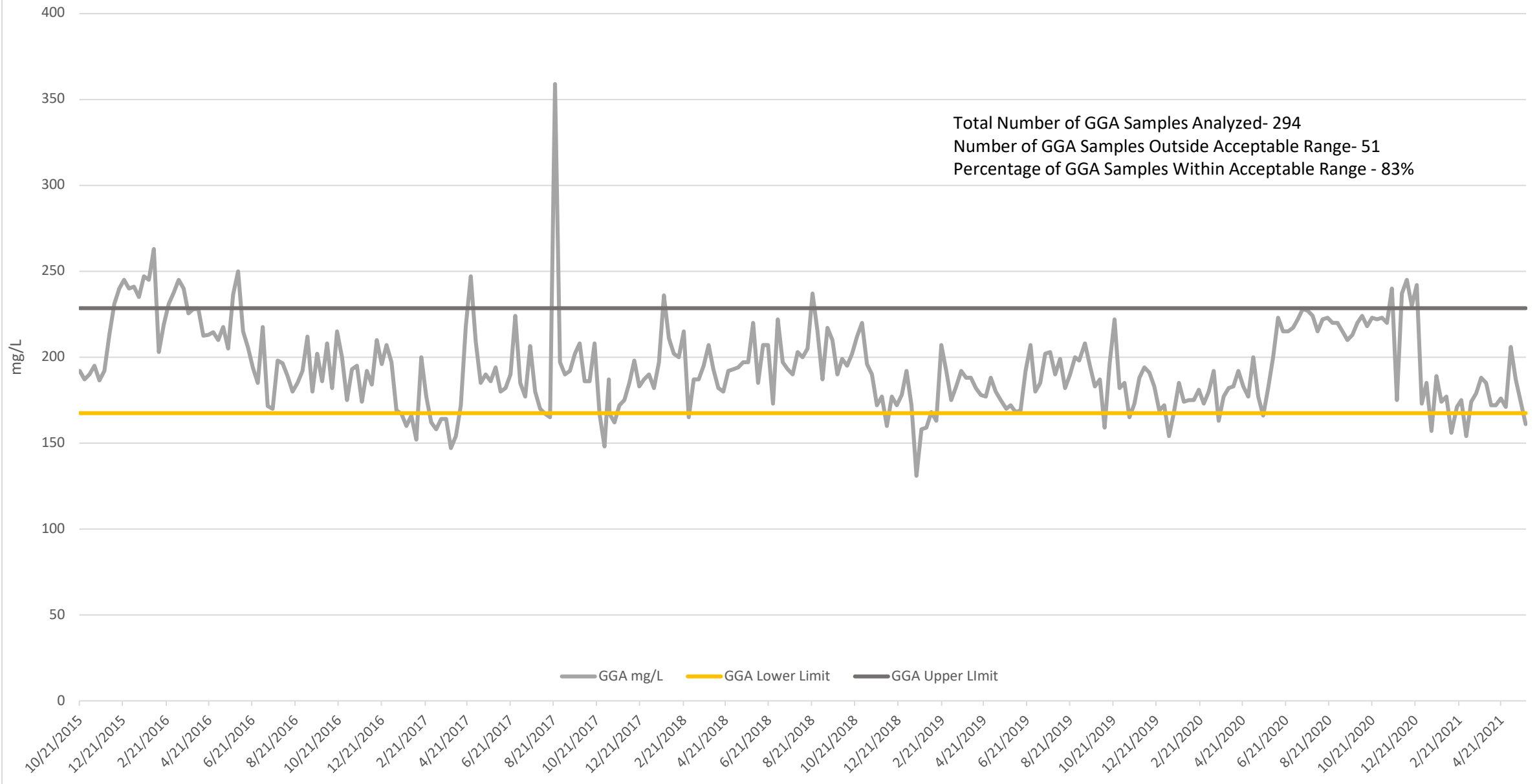


### SMS 002 (GGA Days Only)

There were 4 days in which the BOD loading for SMS 002 was above the monthly average permit limit (11/18/15, 8/3/16, 8/10/16 and 8/17/16). In all cases the average for the month was below the compliance limit.



# GGA



| Georgia-Pacific Crossett Average BOD Results Comparison |             | Sampling Day 2<br>(GGA run day) | Sampling Days 1 and 3<br>(no GGA run) | Relative Percent<br>Difference (%RPD) |
|---------------------------------------------------------|-------------|---------------------------------|---------------------------------------|---------------------------------------|
| Pre-Shutdown (July 2018 - June 2019)                    |             |                                 |                                       |                                       |
| Outfall 001                                             | Conc (mg/L) | 10.4                            | 9.7                                   | 7.0%                                  |
| SMS 002 (Mossy Lake)                                    | Conc (mg/L) | 5.4                             | 5.5                                   | 1.8%                                  |
| Post-Shutdown (July 2020 - June 2021)                   |             |                                 |                                       |                                       |
| Outfall 001                                             | Conc (mg/L) | 10.8                            | 10.7                                  | 0.9%                                  |
| SMS 002 (Mossy Lake)                                    | Conc (mg/L) | 6.8                             | 6.7                                   | 1.5%                                  |

Notes:

Pre and Post Shutdown averages for Outfall 001 based on results from the first full sampling week for each month from July 1 - June 30 of the specified time period

Pre and Post Shutdown averages for SMS 002 based results from days when Mossy Lake was not flooded from July 1 - June 30 of the specified time period