



*Georgia-Pacific Crossett LLC
Consumer Products*

Crossett Paper Operations
100 Mill Supply Road
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March 14, 2016

Layne Pemberton, NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Incident Report – Georgia-Pacific Crossett LLC - Crossett Paper Ops
NPDES Permit No. AR0001210 AFIN 02-00013

Dear Mr. Pemberton:

This letter is being submitted as a follow-up to the email and verbal notifications, submitted on Wednesday, March 9 and Thursday March 10, 2016, pertaining to the extreme flooding conditions experienced in Crossett last week. The flooding was due to the heavy rains experienced in Crossett on 3/8 (4.1 inches of rain) and 3/9 (8.25 inches of rain) as measured at the Technical Center at Crossett Paper Operations.

There were three separate areas where flooding-related incidents occurred:

- An overflow of the North Landfill's leachate collection system and the East Landfill's leachate collection system.
- Exceedance of the flume capacity at Outfall 001.
- An overflow of the wastewater collection system near the southwest corner of the mill site near Hancock Road.

Leachate collection system overflows

On the morning of 3/9/2016, it was discovered that the leachate collection system associated with the mill's North Landfill (Class 3N Landfill Permit No. 0292-S3N) was overwhelmed with storm water, which overflowed the berm on the northwest corner of the landfill cell. No additional discharges from the North Landfill's leachate collection system were observed after 3/10/2016; however, the leachate collection system from the facility's East Landfill (Class 3N Landfill Permit No. 0270-S3N-R2) began to overflow the morning of 3/10/2016. This overflow seemed to have ceased by the morning of 3/11/2016. Because of the severe conditions and the difficulty in determining overflow from other storm waters, an estimate of the volume discharged cannot be made. Samples were collected from both locations. Results will be reported as soon as they are available from the third party lab.

Exceedance of flume capacity at Outfall 001

Effluent flows from Outfall 001 could not be measured for the 24 hour periods for 3/9/2016 and 3/10/2016 due to the fact that the water level had flooded over the flow measuring device and outside the flume structure. Samples were collected for Biological Oxygen Demand (BOD), Total Suspended Solids (TSS) and Adsorbable Organic Halogens (AOX); however, accurate mass loading calculations cannot be made since the effluent flow could not be measured at the time.

Overflow of the wastewater collection system

We also have reason to believe that effluent and excess storm water from the area near the southwest corner of the mill site may have overflowed the wastewater collection system just before entering the enclosed pipeline which goes under Hancock Road and Hwy 82 in Crossett. This was discovered late afternoon on 3/9/2016, but floodwaters had receded by the morning of 3/10/2016. We cannot estimate a volume for this overflow.

For corrective actions for these incidents, GP is presently undertaking a storm water management study with an outside consultant to better understand the storm water routing within the mill site, and will evaluate the system for added routing, management or holding of storm water.

If you have any questions, or would like more information please do not hesitate to contact Rachel Johnson at Rachel.Johnson2@GAPAC.com or (870) 567-8170.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Michael L. Hohnadel
Vice President - Manufacturing
Georgia Pacific Crossett LLC
Crossett Paper Operations