



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

February 4, 2016

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

RE: Georgia-Pacific Crossett LLC, NPDES Permit # **AR0001210**

Dear Mr. Healey:

On October 16, 2015, a modification was issued for NPDES Permit Number AR0001210 for Georgia-Pacific Crossett LLC, which became effective on October 30, 2015. The modification allowed for the continued use of hydrogen peroxide and an organic iron catalyst, AOTech CW for control of hydrogen sulfide emissions from the wastewater treatment system. ADEQ added condition number 21 to Part II of the permit which included usage restrictions of these chemicals. In an effort to reduce the risk of odors, the facility inadvertently failed to comply with the average daily chemical usage rates for the months of November 2015, December 2015 and January 2016 at the P2 Sewer and Prior to the Primary Clarifier for both hydrogen peroxide and AOTech CW. Further, there were 32 instances when the daily maximum usage was exceeded for AOTech CW at the P2 Sewer and 12 prior to the primary clarifier. The daily maximum usage was exceeded 7 times for Hydrogen Peroxide prior to the primary clarifier.

The exceedance of the usage restrictions pose no adverse environmental impact: to the contrary, the use of the advanced oxidation system has beneficially reduced odor in the community as well as providing other beneficial treatment impacts including increased BOD and color reduction. Hydrogen peroxide oxidizes substances rapidly (within minutes) and decomposes to water and oxygen. The added oxygen also has a beneficial impact on BOD reduction and odor prevention. The small amount of iron added only catalyzes the peroxide action. Iron is typically sequestered with the solids and settles out. There has been no noticeable change in our effluent monitoring.

Administrative controls have been put in place to ensure that no further exceedances of the usage restrictions occur, including daily log checks and daily review of the running feed rate average. However, as GP maintained in the permit modification process, these restrictions are only limiting beneficial treatment. GP intends to comment on this condition in the public comment period of our NPDES permit renewal process, and request its removal or modification.

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,

A handwritten signature in black ink, appearing to read 'Michael L. Hohnadel'.

Michael L. Hohnadel
Vice President - Manufacturing
Crossett Paper Operations