

From: [Johnson, Rachel M. \(Crossett\)](#)
To: [Pemberton, Layne](#)
Cc: [Ross, Sarah M.](#); [Young, Michael](#)
Subject: NPDES Permit No. AR0001210
Date: Wednesday, January 20, 2016 5:10:50 PM

AFIN 02-00013

NPDES Permit No. AR0001210

RE: Courtesy Notification of Primary Clarifier out of service for extended maintenance/repair

Mr. Pemberton,

This email follows up a discussion yesterday between Rachel Johnson and Michael Young regarding Georgia-Pacific Crossett LLC – Crossett Paper Operations' (GP's) primary clarifier. As discussed with Mr. Young, GP's primary clarifier has taken out of service for repairs, which are expected to take several weeks. This event does not trigger Part III.D.6. Twenty-four Hour Report or other reporting obligations in the permit; however, we are making a courtesy notification to ADEQ.

The attached "Georgia-Pacific LLC Crossett Paper Operations Waste Water Treatment Schematic" found in Section 6 of the NPDES Permit Modification Application dated May 22, 2015 and approved on October 30, 2015, specifically accounts for this alternative operating scenario, where wastewater is routed around the primary clarifier directly to the ash basins for primary solids treatment and removal. (See highlighted portion of the attached schematic.)

Additionally, while GP does not view this operating scenario as a bypass because it is specifically contemplated in the permit application, we note that Part III.4.a. of the permit "allow[s] any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation". We do not anticipate any effluent limitations to be exceeded, and flow to the primary clarifier will be restored once the maintenance is complete. The notice and prohibition provisions set forth in Parts III.4.b. and c do not apply under these circumstances.

Please contact me should you have any questions or need additional information.

Sincerely,
Sarah Ross
Phone: (870) 567-8670