



Georgia-Pacific Consumer Operations LLC
Consumer Products

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September 17, 2021

Sent Via Email (selfdisclosurepolicy@adeq.state.ar.us)
And FedEx 2838 3760 8970

Mr. Aaron Black
Director of Compliance
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: NPDES Permit No. AR0001210, AFIN 02-00013
Georgia-Pacific Consumer Operations LLC: Crossett Paper Operations
Voluntary Self-Disclosure

Dear Mr. Black:

On behalf of Georgia Pacific Consumer Operations - Crossett Paper Operations (GP), please accept the following voluntary self-disclosure in accordance with DEQ's *Environmental Self-Disclosure Incentive Policy*. This disclosure relates to certain compliance sampling practices that were discovered through an independent, third-party environmental audit on August 31, 2021, and first reported to DEQ by telephone on September 1, 2021. Immediately following discovery, GP commissioned a thorough and independent investigation. This self-disclosure reflects the findings of that investigation.

The specific practices being self-disclosed are as follows:

- Samples for TSS and BOD are collected from the mill's two compliance sampling points (Outfall 001 and SMS 002), as well as the internal diagnostic sampling point (E1). After these samples are brought to the onsite analytical lab, the water is screened through a sieve prior to being placed into smaller bottles for analysis. Based on our investigation, this practice appears to date back at least a decade or more, with the intent of removing duckweed, pebbles, dead bugs and other potential interferences. GP acknowledges that the relevant analytical method for TSS allows the removal of large floating particles and non-homogeneous materials from samples prior to analysis, but the analytical method for BOD does not. Also, the current practices identified during the third-party audit involved

the use of a 150-micron sieve. It is unclear whether in the past, a different sized sieve or filter was used.

- In an effort to understand the possible impact of the sieving step on the analytical results, GP has initiated a series of side-by-side analyses of Crossett samples with and without screening. In addition, recognizing that these comparisons only reflect conditions since closure of the pulp mill in 2019, GP is also conducting side-by-side analyses of samples from another active pulp mill within the company's fleet. GP believes these side-by-side comparisons will help to demonstrate that there were no adverse environmental impacts associated with the screening practices, and GP commits to provide DEQ with the verified results as soon as they are available. Importantly, the initial, unverified results indicate the sieving did **not** impact the sample results.

GP understands that it must meet eight conditions in order for DEQ to mitigate any otherwise applicable penalties under its *Environmental Self-Disclosure Incentive Policy*. As explained in more detail below, GP believes that it meets all eight conditions.

1. Systematic Discovery Through an Environmental Audit or an Environmental Management System

The self-reported issues were discovered through an independent, third-party environmental audit conducted by an experienced auditor from Environmental Standards, Inc., which is nationally recognized for its auditing expertise.

2. Voluntary Discovery

The self-reported issues were identified voluntarily, and not through a legally mandated monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial or administrative order. GP recognizes that it previously made a voluntary commitment to DEQ to conduct an audit to address laboratory quality assurance / quality control issues identified earlier in the year. However, GP does not believe that this disqualifies it from the policy.

3. Prompt Disclosure

The third-party auditor identified the self-reported issues on August 31, 2021. GP immediately contacted DEQ on September 1, 2021, and committed to conduct a thorough and independent investigation. This written self-disclosure is being made within 21 days of discovery, following completion of that investigation.

4. Discovery Made Independently

The self-reported issues were discovered and identified before DEQ or another government agency likely would have identified them either through its own investigation or from information received through a third party.

5. **Correction and Remediation**

Immediately following discovery, GP suspended use of the internal lab for NPDES compliance purposes for BOD and TSS. Those compliance samples are now sent to a certified, third-party lab for analysis.

6. **Prevent Recurrence**

By suspending use of the internal lab for BOD and TSS, GP has effectively prevented the possibility of recurrence. If in the future, GP elects to resume use of the internal lab for BOD and TSS compliance purposes, GP will ensure that all lab personnel are appropriately trained on applicable sampling SOPs.

7. **No Repeat Violations**

GP has not committed the same, or a closely-related, violation within the past three years. GP is working with DEQ to resolve the laboratory quality assurance / quality control issues identified earlier in the year. Those issues involved analytical practices unrelated to sample collection and handling.

8. **Cooperation**

GP is absolutely committed to cooperating with DEQ and providing whatever information DEQ requests to confirm GP's compliance with the *Environmental Self-Disclosure Incentive Policy*.

Please rest assured that GP takes these issues very seriously. If you have questions or need additional information, please contact me at (870) 415-6363 or Sarah.Ross@gapac.com.

Sincerely,



Sarah M. Ross,
Environmental & Compliance Leader

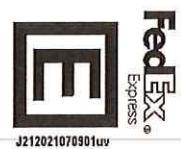
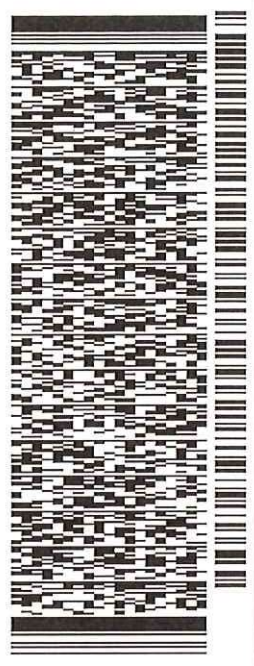
cc: Richard C. Healey, Enforcement Branch Manager via email
Danielle Harbin, Enforcement Coordinator via email

ORIGIN ID: ELDA (870) 415-6363
SARAH ROSS
GEORGIA PACIFIC LLC-CROSSETT PAPER
100 MILL SUPPLY ROAD
DROP POINT 33
CROSSETT, AR 71635
UNITED STATES US

SHIP DATE: 17SEP21
ACTWGT: 1.00 LB
CAD: 102787395/INET4400
BILL SENDER

TO AARON BLACK
ADEQ
5301 NORTSHORE DRIVE

NORTH LITTLE ROCK AR 72118
REF: VOLUNTARY SELF-DISPOSURE
DEPT:
INV: (501) 682-0903
PO:

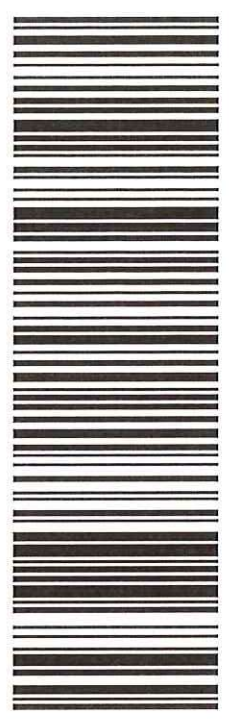


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