

From: [Healey, Richard](#)
To: "Ross, Sarah M."
Cc: [Johnson, Rachel M. \(Crossett\)](#); [Barnett, Mary](#); [Pemberton, Layne](#); [McDonald, Scott](#); [Johnson, Miles](#)
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210
Date: Tuesday, May 30, 2017 4:39:19 PM

Sarah Ross

Sorry for the delay in responding to you. Georgia-Pacific 's invalid WET test is a violation and does require a Non-compliance Report form. A permittee can use ADEQ's form <https://www.adeq.state.ar.us/water/enforcement/pdfs/ncr-form.pdf> or another report/letter as long as it contains the information listed at Part III.D.6 of their permit.

The requirements for DMR submission and required data can be found in 40 CFR 122.41(l)(4)(i), 123.26, 123.41(a), 403.12(e), 403.12(h). The No Data Indicator (NODI) (Compliance Monitoring Activity) - This unique code/description that indicates the reason that "No Discharge" or "No Data" was reported on the compliance monitoring activity (*e.g.*, DMR submission) (*e.g.*, B = Below Detection Limit, C = No Discharge).

Part III, Section D, Condition 7 of Georgia-Pacific Crossett LLC-NPDES Permit AR0001210 (for effluent violations)-

Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Parts II.D.4., 5., and 6., at the time monitoring reports are submitted. The reports shall contain the information listed at Part III.D.6.

Based on the information discussed in our conversation and once ADEQ has had a chance to review the submitted DMR and supporting WET Test documents, it appears the invalid test violation has been corrected, in part, based on Mary Barnett's letter. Unless something else come to light, this issue has been addressed and no additional enforcement is warranted.

If you have any other questions, please do not hesitate to contact me.

Thanks

Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Environmental Quality
501-682-0640
healeyr@adeq.state.ar.us

From: Ross, Sarah M. [mailto:Sarah.Ross@GAPAC.com]
Sent: Wednesday, May 24, 2017 4:13 PM
To: Healey, Richard
Cc: Johnson, Rachel M. (Crossett); Barnett, Mary
Subject: FW: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

NPDES Permit #AR0001210
Facility: Georgia-Pacific Crossett LLC

Mr. Healey,

Thank you for your time this afternoon. We understand the ADEQ Non-compliance Report form itself is not required to be submitted regarding the mill's invalid WET Test, and we can submit a narrative on our letter-head that summarizes the issue. I understand we can name the file as we deem appropriate. Also, I would appreciate being sent the reference that requires NODI invalid tests to be considered non-compliance or violations. From our conversation, it is understood the path forward has been defined, the current matter is resolved and that ADEQ does not plan to continue further enforcement actions.

Thank you for your time.

Sincerely,
Sarah Ross

From: Johnson, Rachel M. (Crossett)
Sent: Friday, May 19, 2017 12:45 PM
Subject: FW: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

edited

Sent with Good (www.good.com)

From: Barnett, Mary <BARNETT@adeq.state.ar.us>
Sent: Friday, May 19, 2017 8:49:31 AM
To: Johnson, Rachel M. (Crossett)
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Sent by an external sender

Rachel,

For the DMR reporting use the NODI code "H".
This is the code for "invalid test".

Attach the March & April test reports, the May 2, 2017 letter from me, a non-compliance report, and a cover letter explaining the invalid tests, my review and decision, and how the receiving water toxicity causing invalid tests will not be an issue in future tests due to the use of synthetic dilution water.

Mary Barnett

From: Johnson, Rachel M. (Crossett) [<mailto:Rachel.JOHNSON2@GAPAC.com>]
Sent: Thursday, May 18, 2017 2:18 PM
To: Barnett, Mary
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Mary,

Have you had a chance to follow up on this reporting yet? As I mentioned yesterday we are hoping to get our DMRs submitted prior to the change over from netDMR to CDX this weekend and the lab still needs to finalize their report. Thank you for your help.

From: Barnett, Mary [<mailto:BARNETT@adeq.state.ar.us>]
Sent: Friday, May 12, 2017 10:14 AM
To: Johnson, Rachel M. (Crossett) <Rachel.JOHNSON2@GAPAC.com>
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Sent by an external sender

Rachel,

Unfortunately, the April test is also considered invalid.

I am in discussions with other ADEQ staff on how GP should report this situation on the WET testing DMR.

I hope to get back with you early next week.

Mary Barnett
Ecologist Coordinator
501-682-0666

From: Johnson, Rachel M. (Crossett) [<mailto:Rachel.JOHNSON2@GAPAC.com>]
Sent: Tuesday, May 02, 2017 10:16 AM
To: Barnett, Mary
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Thank you, Mary. Does this also mean that the most recent test will be accepted as a valid test?

Sent with Good (www.good.com)

From: Barnett, Mary <BARNETT@adeq.state.ar.us>

Sent: Tuesday, May 2, 2017 9:36:09 AM
To: Johnson, Rachel M. (Crossett)
Subject: RE: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Sent by an external sender

Rachel,

The use of synthetic control and dilution water is approved for the remainder of the permit term. Please refer to the attached e-mail.

Mary Barnett
Ecologist Coordinator
501-682-0666

From: Johnson, Rachel M. (Crossett) [<mailto:Rachel.JOHNSON2@GAPAC.com>]
Sent: Friday, April 21, 2017 10:16 AM
To: Barnett, Mary
Subject: Georgia-Pacific Crossett LLC-NPDES Permit #AR0001210

Mary,

Georgia-Pacific Crossett LLC (NPDES permit #AR0001210) initiated our bimonthly WET testing on March 14, 2017. This test was found to be inconclusive for ceriodaphnia dubia as the coefficient of variation (CV) in the 80% exposure was > 40%. A retest was initiated during the week of April 3, 2017. This test also showed a high CV value and it appears that the river water control may be the cause of the high variability of the test. The CV was greater than 40% in the river water control, 45% exposure, and 80% exposure. The CV for the lab water secondary control is only 21%. No significant toxic effect was detected. The benchesheets for both tests are attached. We request your concurrence that the repeat test be considered a valid test.

Due to the intermittent problems with river water, and the cost and resources necessitated to deal with false positive or inconclusive test results, we also request that we be allowed to use lab water in lieu of river water going forward for all tests.

Please feel free to contact me if you have any questions or concerns by email or at the number below.

Rachel M. Johnson
Environmental Engineer
Crossett Paper Operations
(870) 567 8170