



Georgia-Pacific Consumer Operations LLC

Crossett Paper Operations
100 Mill Supply Road
P.O. Box 3333
Crossett, AR 71635
(870) 567-8000
(870) 364-9076 (fax)
www.gp.com

October 23, 2019

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

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

Dear Mr. Pemberton:

On Friday, October 18, 2019, Georgia-Pacific Consumer Operations LLC (GP) submitted a 24-hour report, as required by Part III, D.6. of the permit referenced above, via email to inform you that a daily maximum concentration limit for copper had been exceeded. We now believe the initial analysis to have been invalid, but are providing this letter as the required written 5 day follow-up to ensure the record on this issue is complete..

The initial analytical report received on Friday from the contract lab, indicated the copper concentration to be 43 ug/L. The daily maximum limit is 37.62 ug/L. Since this time the lab has rerun the sample three times with the following results: 14, 18, and 21 ug/L. The lab is unsure why the original analysis gave a higher result, but believes the reanalysis to be more accurate and has issued a revised report, which uses the average of these three retests or 18 ug/L. Please see attached.

Based on these additional analyses, GP is retracting the reported exceedance. We are continuing to work with the lab to understand the circumstances that may have contributed to the initial reported concentration. We will include all valid analysis results along with an appropriate explanation in the monthly Discharge Monitoring Report.

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) 500-3772.

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 Corporation
ATTN: Ms. Rachel Johnson
Post Office Box 3333
Crossett, AR 71635

This report replaces American Interplex Corporation (AIC) Control No. 239021 originally sent on October 18, 2019. This report contains the analytical results and supporting information for the sample received on October 16, 2019. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

Report was revised to correct reported value for Copper.

A handwritten signature in cursive script that reads 'Steve Bradford'.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: Georgia-Pacific Corporation
ATTN: Ms. Rachel Johnson
rachel.johnson2@gapac.com

Georgia-Pacific Corporation
ATTN: Ms. Sarah Ross
sarah.ross@gapac.com

Georgia-Pacific Corporation
ATTN: Sammie Allen
sammie.allen@gapac.com



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Post Office Box 3333
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SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on October 16, 2019
Wastewater Analysis
Outfall 001
P.O. No. 1601322

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
239021-1	Outfall 001	15-Oct-2019 0637	

Qualifiers:

- D Result is from a secondary dilution factor
- X Spiking level is invalid due to the high concentration of analyte in the spiked sample

Case Narrative:

The reported value for Copper is an average of three (3) analyses. Individual results were 0.014mg/L, 0.018mg/L, and 0.021mg/L.

References:

- "Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
- "Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
- "Standard Methods for the Examination of Water and Wastewaters", (SM).
- "American Society for Testing and Materials" (ASTM).
- "Association of Analytical Chemists" (AOAC).



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ANALYTICAL RESULTS

AIC No. 239021-1

Sample Identification: Outfall 001 15-Oct-2019 0637

Analyte		Result	RL	Units	Qualifier
Orthophosphate as P SM 4500-P B,F 2011	Prep: 16-Oct-2019 1020 by 330	1.6	0.5	mg/l	D
		Analyzed: 16-Oct-2019 1206 by 330		Batch: W69592	Dil: 10
Phosphorus EPA 200.7	Prep: 16-Oct-2019 1547 by 100	0.37	0.1	mg/l	
		Analyzed: 17-Oct-2019 1049 by 235		Batch: S47891	
Copper EPA 200.8	Prep: 17-Oct-2019 0937 by 313	0.018	0.0005	mg/l	
		Analyzed: 22-Oct-2019 1347 by 313		Batch: S47894	
Iron EPA 200.8	Prep: 17-Oct-2019 0937 by 313	2.7	0.05	mg/l	
		Analyzed: 17-Oct-2019 1356 by 313		Batch: S47894	
Zinc EPA 200.8	Prep: 17-Oct-2019 0937 by 313	0.026	0.01	mg/l	
		Analyzed: 17-Oct-2019 1356 by 313		Batch: S47894	
Dissolved Iron EPA 200.8	Prep: 17-Oct-2019 0937 by 313	1.6	0.05	mg/l	
		Analyzed: 17-Oct-2019 1352 by 313		Batch: S47894	

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LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Orthophosphate as P	0.5 mg/l	101	85.0-115			W69592	16Oct19 1021 by 330	16Oct19 1139 by 330		
Phosphorus	2 mg/l	96.8	85.0-115			S47891	16Oct19 1548 by 100	17Oct19 1038 by 235		
Copper	0.02 mg/l	103	85.0-115			S47894	17Oct19 0937 by 313	17Oct19 1255 by 313		
Iron	2 mg/l	101	85.0-115			S47894	17Oct19 0937 by 313	17Oct19 1255 by 313		
Zinc	0.02 mg/l	114	85.0-115			S47894	17Oct19 0937 by 313	17Oct19 1255 by 313		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Orthophosphate as P	239014-1	0.5 mg/l	-	80.0-120	W69592	16Oct19 1021 by 330	16Oct19 1204 by 330	5	X
	239014-1	0.5 mg/l	-	80.0-120	W69592	16Oct19 1021 by 330	16Oct19 1205 by 330	5	X
	Relative Percent Difference:		1.02	10.0	W69592				
Phosphorus	239035-2	2 mg/l	92.7	75.0-125	S47891	16Oct19 1548 by 100	17Oct19 1040 by 235		
	239035-2	2 mg/l	93.7	75.0-125	S47891	16Oct19 1548 by 100	17Oct19 1043 by 235		
	Relative Percent Difference:		0.947	20.0	S47891				
Copper	238994-1	0.02 mg/l	-	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1312 by 313	5	X
	238994-1	0.02 mg/l	-	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1304 by 313		X
	Relative Percent Difference:		3.93	20.0	S47894				
Iron	238994-1	2 mg/l	96.3	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1259 by 313		
	238994-1	2 mg/l	98.7	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1304 by 313		
	Relative Percent Difference:		2.37	20.0	S47894				
Zinc	238994-1	0.02 mg/l	-	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1312 by 313	5	X
	238994-1	0.02 mg/l	-	75.0-125	S47894	17Oct19 0937 by 313	17Oct19 1304 by 313		X
	Relative Percent Difference:		1.97	20.0	S47894				

LABORATORY BLANK RESULTS

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	QC
Orthophosphate as P	< 0.028 mg/l	0.028	0.05	W69592-1	16Oct19 1021 by 330	16Oct19 1138 by 330	
Phosphorus	< 0.05 mg/l	0.05	0.1	S47891-1	16Oct19 1548 by 100	17Oct19 1034 by 235	
Copper	< 0.0005 mg/l	0.0005	0.0005	S47894-1	17Oct19 0937 by 313	17Oct19 1220 by 313	
Iron	< 0.03 mg/l	0.03	0.05	S47894-1	17Oct19 0937 by 313	17Oct19 1220 by 313	
Zinc	< 0.005 mg/l	0.005	0.01	S47894-1	17Oct19 0937 by 313	17Oct19 1220 by 313	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: G.P. Crossett Paper			PO No. 1601322		NO OF BOTTLES	ANALYSES REQUESTED										AIC CONTROL NO. 139001				
Project Reference: Waste Water Analysis			MATRIX			Copper Zinc & Iron	Dissolved Iron	Total Phosphorus	ortho-Phosphorus											AIC PROPOSAL NO:
Project Manager: Rachel Johnson			W	S																
Sampled By: C. Lewis			G	C	A	S													Received Temperature C	
AIC No.	Sample Identification	Date/Time Collected	R	O	T	E													Remarks	
	Old Fall Od	10-15-19 / 6:37am					4	✓	✓	✓	✓									
Container Type			Field pH calibration																	
Preservative			on _____ @ _____																	
			Buffer:																	
G = Glass P = Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate																				
NO = none S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate A = (NH ₄) ₂ SO ₄ , NH ₄ OH																				
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN _____ DAYS					Relinquished By: C. Lewis		Date/Time: 10-15-19 / 1:30pm		Received By:		Date/Time:									
Expedited results requested by: _____					Relinquished By:		Date/Time:		Received in Lab By: AC341		Date/Time: 10-16-19									
Who should AIC contact with questions: _____					Comments:															
Phone: _____ Fax: _____																				
Report Attention to: _____																				
Report Address to: _____																				
Email Address: _____																				

00193

00200

FedEx Package
Express **US Airbill**

FedEx Tracking Number **8149 4716 3362**

Form ID No. **0215**

Recipient's Copy

fedex.com 1800.GoFedEx 1800.463.3339

fedex.com 1800.GoFedEx 1800.463.3339

1 From

Date [REDACTED]

Sender's Name **REBECCA BLANKENSHIP** Phone **870 567-8812**

Company **GEORGIA PACIFIC/ENVIRONMENTAL**

Address **100 SUPPLY RD**

City **CROSSETT** State **AR** ZIP **71635**

2 Your Internal Billing Reference

3 To

Recipient's Name **Sample Receiving** Phone [REDACTED]

Company **American Interplex**

Address **8600 Kanis Rd.**

City **Little Rock** State **AR** ZIP **72204**



8149 4716 3362

0134118725

4 Express Package Service * To meet location.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Saturday unless Saturday Delivery is selected.

FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Saturday unless Saturday Delivery is selected.

FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging * Delivered value plus BSM

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Packages may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
Someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?
One box must be checked.

No Yes (as per attached Shipper's Declaration) Yes (Shipper's Declaration not prepared) Dry Ice (Dry Ice, I, UN 1845) _____ kg

Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. is correct. I will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages **1** Total Weight **24** lbs. Credit Card Auth. [REDACTED]

Your liability is limited to USD\$500 unless you declare a higher value. See the current FedEx Service Guide for details.

611

00200

00252

FedEx Package Express **US Airbill**

FedEx Tracking Number

8127 7709 1088

Form ID No.

0215

Recipient's Copy

fedex.com 1.800.GoFedEx 1.800.463.3339

1 From
Date 10-23-19

Sender's Name REBECCA BLANKENSHIP Phone 870 567-8812

Company GEORGIA PACIFIC/ENVIRONMENTAL

Address 100 SUPPLY RD

City CROSSETT State AR ZIP 71635

2 Your Internal Billing Reference

3 To
Recipient's Name Layne Pemberton Phone

Company AR Dept of Env. Quality

Address 5301 Northshore Drive
We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address North Little Rock
Use this line for the HOLD location address or for continuation of your shipping address.

City North Little Rock State AR ZIP 72118



8127 7709 1088

0129407041

4 Express Package Service *To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

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FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

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No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. Dry Ice Dry Ice, 9, UN 1845 x kg Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.
 Sender Acct. No. in Section I will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages 1 Total Weight 1 lbs. Credit Card Auth.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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