



Georgia-Pacific Crossett LLC
Consumer Products

[Crossett Paper Operations](#)
[100 Mill Supply Road](#)
[P.O. Box 3333](#)
[Crossett, AR 71635](#)
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February 24, 2023

Leslie Allen-Daniel
Enforcement Coordinator
Office of Water Quality
Arkansas Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Crossett LLC: Crossett Paper Operations
NPDES Permit # **AR0001210, AFIN 02-00013**

Dear Mrs. Allen-Daniel:

This letter is being submitted per your telephone conversation and guidance to Rachel Johnson on January 13, 2023. As discussed, Georgia-Pacific Crossett LLC, Crossett Paper Operations collected samples on January 4, 2023, at Outfall 001 and sent them to the contract lab, American Interplex Corporation, for Biological Oxygen Demand (BOD5) and Total Suspended Solids (TSS) analysis in accordance with NPDES Permit #AR0001210. On January 13, 2023, the lab contacted the facility to inform Ms. Johnson that the BOD result of 76 mg/L appeared suspect and did not match historical data for the facility. As described in the attached Lab Report No. 272069, the sample was reanalyzed (outside of holding time) with a result of 8.93 mg/L. The average BOD concentration at Outfall 001 over the past 2 years has been 12.4 mg/L. Additionally, as stated in the Case Narrative of the lab report, "Chemical Oxygen Demand (COD) was conducted within holding time with a result of 64 mg/L. BOD results cannot be greater than COD results." The contract lab was unable to determine the cause of the abnormal sample result, therefore, we have conservatively reported the original result of 76 mg/L per the discussion.

As discussed with Ms. Johnson on January 13, 2023, this result did not affect the mill's ability to meet the current NPDES permit limits.

If you have any questions regarding this submittal, please feel free to contact Rachel Johnson at (870) 500-3772 or by email at rachel.johnson2@gapac.com.

Sincerely,

A handwritten signature in blue ink that reads 'Sarah M. Ross'.

Sarah M. Ross
Environmental and Compliance Leader

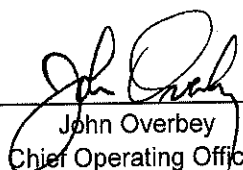


Georgia-Pacific Corporation
ATTN: Ms. Rachel Johnson
100 Supply Road
Drop Point 33
Crossett, AR 71635

This report contains the analytical results and supporting information for the sample received on January 5, 2023. 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.



John Overbey
Chief Operating Officer

This document has been distributed to the following:

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



Georgia-Pacific Corporation
100 Supply Road
Drop Point 33
Crossett, AR 71635

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on January 5, 2023
BOD & TSS Samples
P.O. No. 4500307559

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>
272069-1	Outfall 001	04-Jan-2023 0706	

Case Narrative:

BOD data did not match historical data. The sample was reanalyzed outside of holding time with the result of 8.93mg/L. Additionally, Chemical Oxygen Demand (COD) was conducted within holding time with a result of 64mg/L. BOD results cannot be greater than COD results.

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. 272069-1

Sample Identification: Outfall 001 04-Jan-2023 0706

<u>Analyte</u>		<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Total Suspended Solids		12	10	mg/l	
SM 2540 D 2015	Prep: 06-Jan-2023 0908 by 375	Analyzed: 06-Jan-2023 1608 by 375		Batch: W81919	
BOD 5-day		76	7	mg/l	
SM 5210 B 2016	Prep: 05-Jan-2023 1134 by 100	Analyzed: 10-Jan-2023 1035 by 100		Batch: W81887	



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DUPLICATE RESULTS

<u>Analyte</u>	<u>AIC No.</u>	<u>Result</u>	<u>RPD</u>	<u>RPD Limit</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
BOD 5-day	272032-3	< 2 mg/l			05Jan23 0647 by 100	10Jan23 0939 by 100		
	Batch: W81887	Duplicate < 2 mg/l	0.00	20.0	05Jan23 0939 by 100	10Jan23 0941 by 100		
Total Suspended Solids	272090-1	< 10 mg/l			06Jan23 0908 by 375	06Jan23 1608 by 375		
	Batch: W81919	Duplicate < 10 mg/l	0.00	20.0	06Jan23 0908 by 375	06Jan23 1608 by 375		

LABORATORY CONTROL SAMPLE RESULTS

<u>Analyte</u>	<u>Spike Amount</u>	<u>%</u>	<u>Limits</u>	<u>RPD</u>	<u>Limit</u>	<u>Batch</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
Total Suspended Solids	2000 mg/l	91.7	80.0-120			W81919	06Jan23 0908 by 375	06Jan23 1608 by 375		
BOD 5-day	200 mg/l	107	84.5-115			W81887	05Jan23 0939 by 100	10Jan23 0857 by 100		

LABORATORY BLANK RESULTS

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>LOQ</u>	<u>QC Sample</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Qual</u>
Total Suspended Solids	< 10 mg/l	10	10	W81919-1	06Jan23 0908 by 375	06Jan23 1608 by 375	
BOD 5-day	< 2 mg/l	2	2	W81887-1	05Jan23 0939 by 100	10Jan23 0855 by 100	

DILUTION WATER DISSOLVED OXYGEN DEPLETION RESULTS

<u>Analyte</u>	<u>Average</u>	<u>Limit</u>	<u>Date</u>	<u>Qual</u>
BODs	< 0.1 mg/l	0.2 mg/l	16Jan23	

