



Georgia-Pacific LLC
Consumer Products

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

October 30, 2014

Loretta Reiber
Permit Engineer
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific LLC: Crossett Paper Operations
NPDES Permit # **AR0001210**, **AFIN 02-00013**
Mercury Minimization Plan Annual Report

Dear Ms. Reiber:

On September 1, 2011 Georgia-Pacific LLC, Crossett Paper Operations submitted a Mercury Minimization Plan as required by Condition No. 20 of Part II of the current NPDES Permit #AR0001210. Below is an outline of activities performed over the past year in accordance with the plan.

Summary of Potential Significant Sources

As described in the plan, mercury may be introduced in trace amounts in both raw materials and chemicals used in the mill. There have been no significant process changes over the past year, which would impact the potential sources described in the plan. However, in August of 2014, the mill transitioned from diaphragm grade caustic to membrane grade caustic for use in the recovery process. This should have a positive impact on the facility's mercury footprint as membrane grade caustic has fewer impurities, including mercury content. There have been no other significant changes in the types of chemicals used.

Control Measures

Public Education

Public education materials were mailed to all City of Crossett water users during the fall of 2011, instructing them on the dangers of mercury contamination and proper disposal of mercury

containing devices. In addition, notes are routinely included on water bills and a notice was run on the local cable channel, letting residents know that mercury containing devices could be dropped off at the Crossett City Hall for proper disposal.

Crossett Paper Operations annually trains all employees on the proper collection and disposal of any potentially hazardous or universal wastes, including mercury waste. This was last done in the fourth quarter of 2013 and will be completed again by the end of fourth quarter of 2014.

Collection Activities

The Crossett City Hall has designated a collection location for all mercury and mercury containing devices brought by residents for disposal. For Crossett Paper Operations, the Environmental Department is responsible for collecting and shipping mercury wastes to the proper disposal facilities. Annual events are held to encourage employees to bring mercury containing items for proper disposal. Over the past year, the facility has collected and shipped offsite for recycling approximately 22.6 lbs. of mercury waste.

Effluent Guidelines Review

EPA is currently working to issue pretreatment standards for discharges to publicly-owned treatment works from Dental Amalgam activities (i.e., disposal of old mercury containing fillings at dental offices). The rule was just proposed on October 22, 2014 as described in the Federal Register notice at <http://www.gpo.gov/fdsys/pkg/FR-2014-10-22/pdf/2014-24347.pdf>. This rule is intended to reduce mercury discharges from dental offices. GP will communicate with the City of Crossett about contacting local dentists regarding the proposed pretreatment measures being proposed.

Precipitation

A review of the data at the closest air deposition monitoring site show no changes in data collected since 2010. Previous reports had estimated the mercury load from precipitation as 11.1 ng/l.

Source Reduction Activities

The mills have various programs in place to minimize spills and releases throughout the mill, including methods for housekeeping, spill control and collection. Best management systems include tank and process vessel integrity testing, high level alarms, spill collection and control equipment, secondary containment and area curbing. Work practices include risk assessments, preventive maintenance, and inspections.

All chemicals used at GP are subject to a chemical review and approval for applicable regulatory and internal GP requirements. Before new chemicals are ordered and brought onsite, they are reviewed using the New Substance Review (NSR) procedures in order to determine proper compliance assurances, management and reporting requirements associated with their use.

Monitoring

Over the past year, quarterly sampling has been initiated at various points in the mill and at the wastewater treatment plant, including Outfall 001 and the discharge from the City of Crossett. A summary of the results is as follows:

	Hg in ug/L				
	3rd Quarter 2013	4th Quarter 2013	1st Quarter 2014	2nd Quarter 2014	3rd Quarter 2014
Outfall 001	ND	0.0031	0.0022	ND	ND
City of Crossett	0.0013	ND	ND	0.0010	0.0013
Fine Paper	ND	ND	ND	0.013	ND
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	ND	ND	ND	0.0030	ND
#4&5 Tissue	0.0015	ND	ND	0.022	0.0014
#6&7 Tissue	0.0032	0.0013	ND	0.065	0.0016
Board Mill	0.0081	ND	ND	0.0088	ND
Pulp Mill Digesters	0.0011	ND	ND	0.0099	ND
GP Lake (Influent)	0.0017	0.00055	ND	0.0011	0.0002
Process Sewer 1	0.0020	ND	ND	ND	0.0037
Process Sewer 2	ND	ND	ND	ND	ND
Process Sewer 3	0.011	ND	0.0031	ND	ND

We believe the above results indicate that mercury contributions are largely non-detectable in most of the in-plant sources, and the occasional detectable concentrations are not directly related to any process activities. The average level measured at Outfall 001 for the last four quarters is 0.0027 ug/L. As documented in the TMDL for the Ouachita River¹, most mercury in the basin is the result of air deposition. Given the very low levels of mercury measured in the effluent, we do not believe that any changes are necessary to this successful pollution prevention program.

If you have any questions or need additional information, please feel free to contact me at (870) 567-8170 or by email at rachel.johnson2@gapac.com.

Sincerely,

Rachel M. Johnson
Environmental Engineer

¹ "TMDLs for Segments listed for Mercury in Fish Tissue for the Ouachita River Basin, and Bayou Bartholomew, Arkansas and Louisiana to Columbia", FTN Associates for US EPA VI, December 18, 2002.