



Georgia-Pacific Crossett LLC
Consumer Products

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

February 4, 2016

Mr. Richard Healey
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Georgia-Pacific Crossett LLC, NPDES Permit # **AR0001210**

Dear Mr. Healey:

On October 16, 2015, a modification was issued for NPDES Permit Number AR0001210 for Georgia-Pacific Crossett LLC, which became effective on October 30, 2015. The modification allowed for the continued use of hydrogen peroxide and an organic iron catalyst, AOTech CW for control of hydrogen sulfide emissions from the wastewater treatment system. ADEQ added condition number 21 to Part II of the permit which included usage restrictions of these chemicals. In an effort to reduce the risk of odors, the facility inadvertently failed to comply with the average daily chemical usage rates for the months of November 2015, December 2015 and January 2016 at the P2 Sewer and Prior to the Primary Clarifier for both hydrogen peroxide and AOTech CW. Further, there were 32 instances when the daily maximum usage was exceeded for AOTech CW at the P2 Sewer and 12 prior to the primary clarifier. The daily maximum usage was exceeded 7 times for Hydrogen Peroxide prior to the primary clarifier.

The exceedance of the usage restrictions pose no adverse environmental impact: to the contrary, the use of the advanced oxidation system has beneficially reduced odor in the community as well as providing other beneficial treatment impacts including increased BOD and color reduction. Hydrogen peroxide oxidizes substances rapidly (within minutes) and decomposes to water and oxygen. The added oxygen also has a beneficial impact on BOD reduction and odor prevention. The small amount of iron added only catalyzes the peroxide action. Iron is typically sequestered with the solids and settles out. There has been no noticeable change in our effluent monitoring.

Administrative controls have been put in place to ensure that no further exceedances of the usage restrictions occur, including daily log checks and daily review of the running feed rate average. However, as GP maintained in the permit modification process, these restrictions are only limiting beneficial treatment. GP intends to comment on this condition in the public comment period of our NPDES permit renewal process, and request its removal or modification.

If you have any questions or need additional information, please feel free to contact Sarah Ross at (870) 567-8670 or by email at Sarah.Ross@gapac.com.

Sincerely,

Michael L. Hohnadel
Vice President - Manufacturing
Crossett Paper Operations

00151

00200

MUR3

FedEx Package Express *US Airbill*

FedEx Tracking Number

8089 1626 9575

Form ID No. 0215

12294

fedex.com 1.800.GoFedEx 1.800.463.3339

05689025

1 From [Redacted] Date 2-5-16

Sender's Name REBECCA BLANKENSHIP Phone 870 667-9812

Company GEORGIA PACIFIC/ENVIRONMENTAL

Address 100 SUPPLY RD

Dept./Floor/Suite/Room

City CROSSETT State AR ZIP 71625

2 Your Internal Billing Reference

3 To Recipient's Name Richard Healey Phone [Redacted]

Company ATC Dept. of Env. Quality

Address 5301 Northshore Dr

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

Address [Redacted]
Use this line for the HOLD location address or for continuation of your shipping address.

City North Little Rock State AR ZIP 72118

0120467477



8089 1626 9575

4 Express Package Service *To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the
FedEx Express Freight US Airbill.

Next Business Day

2 or 3 Business Days

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

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

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

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

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

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

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

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

Does this shipment contain dangerous goods?

One box must be checked.

No Yes Yes
As per attached Shipper's Declaration. Shipper's Declaration not required.

Dry Ice
Dry ice, 9 UN 1845 _____ x _____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

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 Total Weight

Credit Card Auth.

lbs.

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



fedex.com 1.800.GoFedEx 1.800.463.3339