



*Georgia-Pacific 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

October 3, 2014

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

RE: Incident Report – Primary Clarifier By-Pass, Georgia-Pacific LLC - Crossett Paper Ops  
NPDES Permit No. AR0001210 AFIN 02-00013

Dear Mrs. Schluterman:

This letter is being submitted as a follow-up to the initial notification, submitted by email on Monday, September 29, 2014, pertaining to our WWTP primary clarifier being by-passed after the clarifier rake kicked out due to high torque the night of Friday, September 26, 2014 at approximately 11pm. The clarifier was drained and inspected this week and will be put back in service today, Friday, October 3, 2014.

After inspection and investigation this week, the root cause has been determined to be high loading due to fiber loss from process areas and the use of the new electronic torque monitoring controls which were installed September 1, 2014, and put into operation September 22, 2014. The new controls were part of the clarifier upgrades which were previously communicated to ADEQ. These new electronic controls operated as intended but caused the drive to stop when the torque high limit set point was reached on the night of September 26<sup>th</sup>.

This week's engineering investigations, follow-up and corrective actions included:

- GP inspected the rake arms and repaired damage to one rake.
- GP inspected rake clearances to ensure they were not hitting the bottom of the clarifier.
- Buoyancy pontoons may be installed to midpoints of the rakes to provide lift.
- GP raised the torque setting for rake shutdown as we believe we are still well within failure limits.
- GP inspected the center well to determine if it was blocked or inoperable and nothing exceptional was noted.
- The rake speed will be adjusted with the expected result of getting solids to the center well quicker.
- GP inspected the sludge pumps to confirm they were operating properly to remove solids to presses. No issues with the sludge pumps were evident.

Please note the fiber will settle out in the ash settling basin (in lieu of the primary clarifier) in accordance with the backup capabilities of the system. We do not anticipate that this by-pass will impact the treatment efficiency across the wastewater treatment system. If you have any questions, or would like more information please do not hesitate to contact Rachel Johnson at [Rachel.Johnson2@GAPAC.com](mailto:Rachel.Johnson2@GAPAC.com) or (870) 567-8170.

Sincerely,

A handwritten signature in cursive script that reads "Gary Kaiser". The signature is written in black ink and is positioned above the typed name.

Gary W. Kaiser, VP - Manufacturing  
Georgia Pacific LLC  
Crossett Paper Operations

smr

From: (870) 567-8812  
 Becky Blankenship  
 Georgia-Pacific  
 100 Supply Road  
 Drop Point 33  
 Crossett, AR 71635

Origin ID: ELDA



Ship Date: 03OCT14  
 AcFWgt: 1.0 LB  
 CAD: 102787395/INET3550

Delivery Address Bar Code

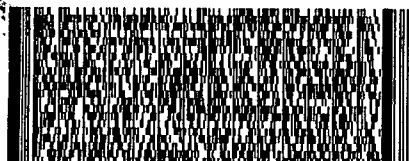


SHIP TO: (501) 682-0744  
**BILL SENDER**  
**AMY SCHLUTERMAN, NPDES ENFORCEMENT**  
**ADEQ**  
**5301 NORTSHORE DR**  
  
**NORTH LITTLE ROCK, AR 72118**

Ref #  
 Invoice #  
 PO #  
 Dept #

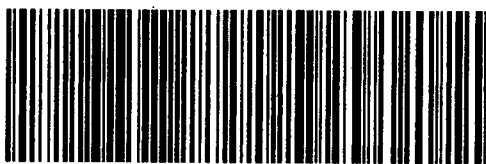
MON - 06 OCT 10:30A  
**PRIORITY OVERNIGHT**

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