

A R K A N S A S Department of Environmental Quality

MAR 2 4 2016

Sarah M. Ross, Environmental Manager Crossett Paper Operations Georgia-Pacific Crossett, LLC P.O. Box 3333 Crossett, AR 71635

RE: NPDES Permit No. AR0001210, AFIN 02-00013

Dear Ms. Ross:

The Department has reviewed your letter dated March 1, 2016, requesting removal of the chemical usage limits on Hydrogen Peroxide and two Organic Iron Catalysts in the renewal permit. Based on this request, it is the Department's understanding that Georgia-Pacific Crossett, LLC (GP) would also prefer that limits on the Iron Salt added to the aeration basin not be included in the permit. (Note: The addition of the Iron Salts was allowed under a pilot study and has been requested to be allowed permanently under the renewal permit.)

Since the Hydrogen Peroxide will decompose to water and oxygen, the Department will propose removing those usage limits when the renewal permit is sent to public notice.

At this time, sufficient information does not exist on the effect of the Organic Iron Catalysts and the Iron Salts on the WET test results. In order for this information to be obtained, the Department will require that samples to be tested for Total Recoverable Iron and Total Dissolved Iron be collected on the same days that the WET samples are collected. The results of the iron tests must be submitted with the WET test results. Once sufficient information has been submitted, the Department will review the data to determine if the usage limits can be removed from the permit.

If you have any questions, please contact me at <u>reiber@adeq.state.ar.us</u> or (501) 682-0612.

Sincerely,

Loretta Reiber, P.E.

Engineer, NPDES Permits

Clark McWilliams, P.E.

Engineer Supervisor, NPDES Permits

cc: Mary Barnett, Ecologist Coordinator