

# ADEQ

ARKANSAS  
Department of Environmental Quality

November 23, 2010

James W. Cutbirth  
Mgr. Environmental & Quality  
Georgia-Pacific LLC  
Crossett Paper Operations  
P.O. Box 3333  
Crossett, Arkansas 71635

RE: NPDES Permit No. AR0001210, AFIN 02-00013  
Request to Accept Wastewater from Taylorsville, MS facility

Dear Mr. Cutbirth:

The Department has reviewed your correspondence dated November 5, 2010, requesting permission to haul excess storm water and process wastewater from Georgia-Pacific LLC's Taylorsville, MS chemical plant to the Crossett facility for treatment and discharge. It is the Department's understanding that there is an excess of storm water and process wastewater at the Taylorsville facility due to heavy rainfalls and that the waters are essentially identical to those already treated at the Crossett facility. The proposed transfer of 33,000 gallons would occur within a week of the date of this letter if approved by the Department.

Condition No. 21 of the NPDES permit for the Crossett facility states that "The permittee must receive written permission prior to the transfer of any product stewardship waters from another Georgia-Pacific LLC facility to the Crossett facility. The request must include, at a minimum, the following items: source of the wastewaters, confirmation that the wastewaters are similar to those already being treated in the system, the need for transferring the wastewater, the volume of wastewater involved, and the dates on which the transfer will occur." Condition No. 21 also states that "The Department reserves the right to deny the request to transfer wastewaters to the Crossett facility in the event that it is determined that the exceptions to 40 CFR Part 437 listed in the preamble are not met or if any transfers cause non-compliance with the terms and conditions of the permit. The Department also reserves the right to require additional monitoring based on the types of wastewater transferred."

The November 5, 2010, letter contains all information required by Condition No. 21 of your NPDES permit. The Department has determined that the waters may be classified as wastewaters from Product Stewardship activities and are therefore exempt from the requirements of 40 CFR Part 437 (see 40 CFR 437.1(b)(4)).

It is important to note that this authorization is valid for only 33,000 gallons. Prior authorization must be obtained prior to transferring any other wastewaters. Please note that future requests for transfers of wastewater from the Taylorsville, MS facility or other facilities owned by Georgia-Pacific Corporation may need to be accompanied by documentation that BMPs have been properly installed, operated, and maintained in a manner to minimize the amount of contaminated stormwater. Documentation concerning the amount of rainfall at the facility may also need to be submitted. If you have any questions, please feel free to contact Loretta Reiber, P.E. at (501) 682-0612 or by e-mail at [reiber@adeq.state.ar.us](mailto:reiber@adeq.state.ar.us).

Sincerely,



Mo Shafii  
Assistant Chief, Water Division

MS:lr