

ADEQ

ARKANSAS
Department of Environmental Quality

September 9, 2011

James Cutbirth
Manager of Environmental and Quality
Crossett Paper Operations
Georgia-Pacific LLC
P.O. Box 3333
Crossett, AR 71635

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

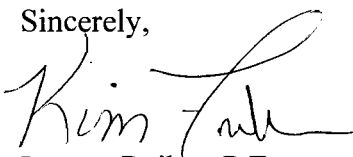
Dear Mr. Cutbirth:

The Department has reviewed the Mercury Minimization Plan (Plan) dated September 1, 2011. The Plan was required to be submitted by Condition No. 20 of Part II of NPDES Permit No. AR0001210.

The Plan meets the requirements set forth in Condition No. 20, paragraphs a and b (Sections 2 and 3, respectively, of the Plan). However, it does not appear to contain all of the requirements contained in Condition No. 20.c (Section 4 of the Plan). Specifically, the Plan does not address the significance of the various sources of mercury nor does it appear to address the tracking of control measures to determine their performance.

Please address the deficiencies in the Plan listed in the preceding paragraph and submit a revised Plan to the Department no later than October 1, 2011. If you have any questions, please contact me at reiber@adeq.state.ar.us or at (501) 682-0612.

Sincerely,

for 
Loretta Reiber, P.E.
Engineer, NPDES Permits

cc: David Ramsey, Environmental Program Coordinator
Jason Bolenbaugh, Enforcement Coordinator