



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

MAY 19 2017

Robert E. Blanz, PhD, P.E.
Acting Senior Operations Manager
Office of Water Quality
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: Interim Objection to Preliminary Draft Permit and Request for Additional Information
Georgia-Pacific Crossett LLC- Crossett Paper Operations
ADEQ Permit No AR0001210

Dear Dr. Blanz:

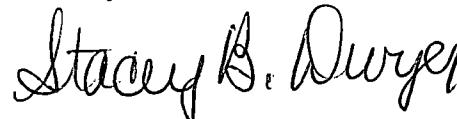
Thank you for the opportunity to review the preliminary draft permit for the Georgia-Pacific Crossett LLC- Crossett Paper Operations (GP Crossett), which was received by this office on February 6, 2017 and revised on March 6, 2017. Based on our review, we believe additional information and clarification regarding the treatment plant and its effluent discharge locations are needed to determine whether the proposed permit meets the guidelines and requirements of the Clean Water Act (CWA). The specific information needed is described below:

- The proposed permit does not appear to follow the CWA requirements in the manner in which it describes why technology based limits apply above Mossy Lake and water quality based limits apply below Mossy Lake. Pursuant to the CWA § 301(b)(1)(c); 40 C.F.R. § 122.44(d), the facility is required to meet technology based limits as well as other applicable limits needed to meet water quality standards prior to discharge to the receiving stream. Based on Mossy Lake being the receiving stream, both technology based limits and water quality based limits should apply prior to discharge into that water body, and there should be no treatment technology below the discharge to Mossy Lake.
- Application of water quality based limits below Mossy Lake could suggest that ADEQ does not consider Mossy Lake the receiving stream, but part of the facility's wastewater treatment system. The current proposed Permit does not appear to support this approach nor does it indicate that Mossy Lake has received a waste treatment system exclusion under 40 CFR 122.2. If ADEQ believes Mossy Lake is an excluded waste treatment system, additional documentation should be added to show that the water body "was designed to meet the requirements of [the] CWA" as required by the regulations.

- The proposed Permit does not clearly delineate where the facility's waste treatment system lies in relation to Coffee Creek upstream of Mossy Lake. GP has stated the mill's effluent channel which conveys the effluent throughout the system is completely separate from Coffee Creek. The proposed Permit should indicate the location of the effluent channels and the location of Coffee Creek, including any information evidencing GP's separation of the two, such as berms or structures installed to avoid communication between the effluent channels and Coffee Creek during flood events.

We will be happy to work with you and your staff to clarify our questions. We would also like to discuss the possibility of incorporating a requirement for an Odor Management Plan into the permit to address odor resulting from the facility's treatment processes. Feel free to contact me at (214) 665-7170, if you have any questions or have your staff contact Monica Burrell at (214) 665-7530, or EMAIL:burrell.monica@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Stacey B. Dwyer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stacey B. Dwyer, P.E.

Associate Director

NPDES Permits and TMDLs Branch

cc: Caleb J. Osbourne (ADEQ Office of Water Quality)



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