

Henderson, Katie

From: Bruce Fielding [Bruce.Fielding@LA.GOV]
Sent: Monday, August 17, 2009 3:02 PM
To: Reiber, Loretta
Cc: 'tillman.michael@epa.gov'; Melvin "Mitch" Mitchell; Jesse Chang
Subject: RE: GP Crosset Mill

Loretta,

I have conducted a review of the SMS2 data concerning the GP Mill (AR0001210) in Crosset, AR. In addition to the potential exceedances of Louisiana Standards noted in your permit fact sheet for Total Recoverable Zinc and Gamma BHC (Lindane), I also noted potential exceedances for Dieldrin as well. The permittee reported values for these parameters above our MQLs and were in exceedance of the instream criteria for the Ouachita River from the Arkansas state line to the Columbia Lock and Dam, listed as segment no. 080101 in Table 3, Numerical Criteria and Designated Uses under LAC 33:IX.1123. The uses of this stream are listed as, Primary Contact Recreation, Secondary Contact Recreation, Fish and Wildlife Propagation, and Drinking Water Supply. Values reported below MQL were not considered in accordance with Volume 3 of our Water Quality Management Plan. I am not sure how Arkansas would implement Stream monitoring data as a permit requirement, but Total Zn, Lindane, and Dieldrin, all have the potential to exceed our water quality standards as the data seems to be ambient and the mill's effluent would appear to be at complete mix by this point. Hardness and TSS used in metal calculations are 38.4 mg/L and 6 mg/L, respectively, provided to you in an email (Franklin (LDEQ) to Reiber (ADEQ)), on 6/16/2009. The metals data reported by the facility at SMS2 are assumed to be total.

Pollutant	Criteria, Acute	Criteria, Chronic	Criteria, Human Health, Drinking Water Supply	
Ambient as Reported at SMS2	ug/L	ug/L	ug/L	ug/L
Total Zn	159.7	146	5000	251
Lindane	5.3	0.21	0.11	0.0969
Dieldrin	0.2374	0.0557	0.00005	0.021

The pesticide values seem rather unusual and significant for this facility type, especially Dieldrin, but as the data suggests, limits are needed. No mixing was considered as SMS2 is more of an ambient monitoring station rather than a discharge point. If am incorrect in any of my assumptions, please send me an email for further clarification and I will do additional analysis.

Thanks,
Bruce Fielding

From: Reiber, Loretta [mailto:REIBER@adeq.state.ar.us]
Sent: Monday, August 17, 2009 1:56 PM
To: Bruce Fielding
Subject: RE: GP Crosset Mill

SMS2 is a stream monitoring station.

-----Original Message-----

From: Bruce Fielding [mailto:Bruce.Fielding@LA.GOV]
Sent: Monday, August 17, 2009 1:53 PM
To: Reiber, Loretta
Subject: GP Crosset Mill

Loretta,

Exactly what is SMS2? Is it an instream monitoring point as the moniker implies or is it actually another outfall to the mill?

Bruce Fielding
Louisiana Department of Environmental Quality
OES
Post Office Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3006