



Ouachita Riverkeeper
2610 Washington Street
Monroe, Louisiana 71201
318.322.7134

RE: Discharge Permit Number AR0001210, AFIN 02-00013: HEARING REQUEST

Georgia-Pacific, LLC
Crossett Paper Operation

Renewal of Waste Water Permit

The Crossett Paper Operation is a major industrial source for the discharge of wastewater.

The wastewater is discharged into Mossy Lake which flows into Coffee Creek and then into the Ouachita River.

The receiving stream is classified for:

- primary and secondary contact recreation
- raw water source for domestic use (public and private)
- industrial water supply
- agricultural water supply
- propagation of desirable species of fish and other aquatic life

The existing discharge permit was issued for a period of five years. The proposed permit will also be issued for a five year period.

The Crossett facility is designed to discharge 45 million gallons of wastewater per day from the following:

- paper mill
- plywood plant
- studmill
- sanitary wastewater
- landfill leachate
- site stormwater
- chemical plant
- building products
- truck wash and backwash wastewater
- treated effluent from the City of Crossett**

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The sludge from the wastewater treatment process is placed in the facilities north landfill or combined with ash, sand, and grit for use as fill material for the sludge pond closure.

Outfall 001 - located immediately downstream of the aerated lagoon and discharging into Mossy Lake

Outfall 001 will be allowed to discharge conventional and toxic pollutants through the outfall into Mossy Lake. The concentrations of the conventional and toxic pollutants are limited by the limits established in the wastewater permit.

The wastewater discharged through Outfall 001 will be allowed to contain up to:

- 24,155.4 pounds per day of Biochemical Oxygen Demand
- 37,720 pounds per day of Total Suspended Solids
- 2,193.04 pounds per day of Adsorbable Organic Halogens
- 0.00034 pounds per day of Dieldrin
- 8.42 pounds per day of recoverable Copper
- 0.026 pounds per day of recoverable Mercury
- 75.21 pounds per day of recoverable Zinc

Dioxin is required to be analyzed in the waste water once per quarter and the value reported as 2,3,7,8-TCDD. No discharge limits have been set for 2,3,7,8-TCDD in the effluent. The only requirement is for the concentration of 2,3,7,8-TCDD to be reported. The lack of discharge limits for 2,3,7,8-TCDD in outfall 001 is not appropriate. The Arkansas Department of Environmental Quality must establish effluent limitations for 2,3,7,8-TCDD in Outfall 001.

Dioxins and Furans are required to be analyzed for in internal outfalls 101,102, and 103. The effluent limits for 2,3,7,8-TCDD for all three internal outfalls is <10 pg/l and the effluent limits for 2,3,7,8-TCDF are 31.9 pg/l for the daily maximum discharge limit. However, these discharge limits should not be used as a reason for not establishing effluent limitations for 2,3,7,8-TCDD in Outfall 001.

Phosphorous and nitrates as nitrogen are required to be monitored in Outfall 001. However, the values only have to be reported. Outfall 001 lacks discharge limitations for phosphorous and nitrates as nitrogen. The Arkansas Department of Environmental Quality must establish

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limitations for phosphorous and nitrates as nitrogen in Outfall 001.

Stream Monitoring Station 002 - at the transition from Mossy Lake to Coffee Creek

SMS 002 has mass loading Biochemical Oxygen Demand criteria that is approximately one-third of the limits for Outfall 001. The mass loading Total Suspended Solids criteria is approximately half of the limit for Outfall 001. However, the mass loading for dieldrin, copper, mercury, and zinc are the same for the instream segment as for Outfall 001. The Biochemical Oxygen Demand and Total Suspended Solids mass loading values should be the same for Outfall 001 as for SMS 002.

Adsorbable Organic Halogens

The Adsorbable Organic Halogen mass loading values allowed to be discharged have increased from the previous permit. The monthly average increased from 2,146 pounds per day to 2,193.04 pounds per day and the daily maximum increased from 3,276 pounds per day to 3,299.97 pounds per day. Such an increase in mass loading is not acceptable.

Anti-backsliding

The anti-backsliding requirements state that the final effluent limitations for reissuance of permits must be as stringent as those in the previous permit. The increase in mass loading criteria for Adsorbable Organic Halogens is in violation of the Anti-backsliding provision.

Best Management Practices

The terms of the draft permit requires the submittal of a report on an annual basis of the Best Management Practices monitoring results, action level exceedances and corrective actions taken to respond to any exceedances. Exceedances are not violations of the permit.

Submittal of the report on an annual basis is not sufficient for ADEQ to identify and track exceedances. The reporting frequency should be at a minimum on a quarterly basis. In addition, ADEQ should define exceedances of conditions of the Best Management Practices as permit violations.

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Compliance History

According to the fact sheet prepared by the Arkansas Department of Environmental Quality, the Discharge Monitoring Reports from December 2003 through December 2008 only reported one exceedance which was a typo error. However, according to individuals and groups living and recreating on/in the waters downstream from the Crossett facility, the water quality is being severely negatively impacted by the discharge from the Crossett facility. The Arkansas Department of Environmental Quality must evaluate the impacts of the Crossett facility effluent on the waters downstream from the facility and determine the extent of negative impacts as a result of the Crossett discharge. The resulting negative impacts must be addressed as a part of the effluent limitations established in this draft wastewater permit.

Based on our concerns as stated above regarding Georgia-Pacific's permit renewal, Ouachita Riverkeeper formally requests ADEQ grant a public hearing to address our concerns and issues. This request is being submitted by e-mail because of time restraints but an original signed document will be mailed.

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