

# Interoffice Memorandum

TO: Becky W. Keogh, Director *JK*

THROUGH: Caleb J. Osborne, Associate Director, Office of Water Quality *JO*  
Bryan Leamons, P.E., Sr. Operations Manager, Office of Water Quality *BL*  
Carrie McWilliams, P.E., Engineer Supervisor *CM*  
Loretta Reiber, P.E., Engineer

FROM: Robert Blanz, PhD, P.E. Chief Technical Officer

DATE: July 5, 2017

SUBJECT: Request for Temporary Variance – Georgia-Pacific Crossett, LLC  
NPDES Permit No. AR0001210 AFIN 02-00013

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On June 28, 2017, Georgia-Pacific Crossett, LLC, (GP) submitted a request to Loretta Reiber, P.E., to conduct a trial to assess the potential to reduce the generation of sulfides in the mill wastewater treatment system.

In conjunction with the EPA on-site and community air sampling program, GP has gathered additional data indicating the ash settling basins have higher H<sub>2</sub>S emissions than other unit processes due, in part, to the likely occurrence of anaerobic biological activity in the basins converting sulfate to sulfide. A portion of the sulfide is in the form of aqueous hydrogen sulfide that is released from the wastewater at the basins and at locations downstream through the treatment system. This trial would allow GP to assess the potential to reduce the generation of sulfides in the mill wastewater treatment system by configuring one of the basins as “flow through” or creating a conveyance around the basins and then assessing whether eliminating these process units would have positive benefits.

The Director shall consider the factors set forth in Ark. Code Ann. § 8-4-230(b)(1) when deciding whether to grant a Temporary Variance. These factors are addressed by the applicant as follows:

- The environmental and public health effects of the request.

Hydrogen sulfide released from the wastewater treatment process potentially contributes to odors. A reduction in the release of hydrogen sulfide and concomitant odors will be beneficial to the environment and public health.

- Any economic advantage obtained by the requesting party over other similarly situated facilities that are operating in accordance with similar permit conditions and that have not requested a temporary variance.

There is no economic advantage obtained by GP over other similarly situated facilities that are operating in accordance with similar permit conditions and that have not requested a Temporary Variance because GP will be incurring cost to alter its treatment process and enhancing removal efficiency of solids to attempt to reduce hydrogen sulfide.

- Whether strict compliance would result in the substantial curtailment or closing down of an existing business seeking a Temporary Variance.

While strict compliance would not result in curtailment of the facility's operations, it does restrict their ability to address community concerns regarding odor associated with the wastewater treatment system. GP is seeking to reduce the hydrogen sulfide and concomitant odors by altering the use of their process units. Unrestricted use of its process units is in the public interest because it could provide further benefits to the community.

The Director may consider the factors set forth in Ark. Code Ann. § 8-4-230(b)(2) when considering a request for a Temporary Variance. These factors are addressed by the applicant as follows:

- Whether strict compliance with permit terms is inappropriate because of conditions beyond the control of the facility.

There is no anticipated non-compliance with permit terms.

- Whether the request is prompted by recurrent or avoidable compliance problems.

The request is not prompted by recurrent or avoidable compliance problems; the request is prompted by recurrent odor emissions and public complaints.

- Whether a review of the operational history of the facility reveals relevant information.

In recent years, odor complaints against GP Crossett appear to have increased. A review of the operations and data reveal relevant information concerning the odor emissions, and allowing alterations in the use of the process units will allow the facility more flexibility in controlling odors.

- Whether the public interest will be served by a temporary variance.

Public interest will be served by this Temporary Variance through the anticipated reduction of odor emissions.