

June 7, 2010

RE: Georgia-Pacific LLC
Crossett Paper Operations
AR0001210

Below is a list of changes that need to be made to the draft permit package for the referenced facility:

Water Quality issues –

Please consider the impact of Color on Ouachita River in Louisiana. Ouachita River is designated as a drinking water supply in Louisiana and as such the color shall not exceed 75 color units on platinum-cobalt scale. According to Louisiana 2006 Integrated Report/303(d) list, this segment of Ouachita River is impaired for color (the suspected source of impairment is natural condition). We suggest considering and evaluating in-stream data for the Ouachita River above and below Coffee Creek.

Technology based permit issues -

(A) Draft Permit

1. Page 1 of Part 1A – Outfall 001:

The monthly average mass limit for AOX needs to be changed from 2193.04 lbs/day to 2161.81 lbs/day due to a typographical error. Specifically, the production-based factor used to calculate this limit was incorrect. (See Comment No. 5 under the section related to the Fact Sheet.)

The monitoring frequency for pH is listed as three/week; however, on page 6 of the fact sheet it is listed as once/day. Please verify the correct monitoring frequency for this parameter.

2. Page 3 of Part 1A – SMS 002:

The monitoring frequency for pH is listed as three/week; however, on page 7 of the fact sheet it is listed as once/day. Please verify the correct monitoring frequency for this parameter.

3. Page 3 of Part II – Section 10:

The BMPs outlined in 40 CFR 430.03(c) need to be included in this section.

(B) Fact Sheet

1. Page 6 of the Fact Sheet – Outfall 001:

The monthly average concentration limit for BOD₅ needs to be changed from 64.6 mg/L to 64.4 mg/L (after rounding).

The monthly average mass limit for AOX needs to be changed from 2193.04 lbs/day to 2161.81 lbs/day due to a typographical error. Specifically, the production-based factor used to calculate this limit was incorrect. (See Comment No. 5 under the section related to the Fact Sheet.)

The monitor frequency for pH is listed as once/day; however, on page 1 (Part 1A) of the draft permit and in other sections of the fact sheet it is listed as three/week. Please verify the correct monitoring frequency for this parameter.

2. Page 7 of the Fact Sheet – SMS 002:

The monitoring frequency for pH is listed as once/day; however, on page 3 (Part 1A) of the draft permit and in other sections of the fact sheet it is listed as three/week. Please verify the correct monitoring frequency for this parameter.

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3. Page 11 of the Fact Sheet:

The monthly average mass limit for AOX needs to be changed from 2193.04 lbs/day to 2161.81 lbs/day due to a typographical error. Specifically, the production-based factor used to calculate this limit was incorrect. (See Comment No. 5 under the section related to the Fact Sheet.)

4. Page 16 of the Fact Sheet – Section 13.b.iii (Limit Calculations):

The production rate for paperboard and tissue paper of 1512 tons/day needs to be changed to 1502 tons/day. [NOTE: I contacted Loretta Rieber (pw) to verify the correct production rate.]

5. Page 19 of the Fact Sheet – Section 13.b.iii (AOX):

In the first section, the effluent guideline citation for the production-based factors for AOX needs to be changed from 40 CFR 430.24(b)(1) to 40 CFR 430.24(a)(1).

The production-based factor used to calculate the monthly average mass limit for AOX needs to be changed from 0.632 lbs/1000 lbs to 0.623 lbs/1000 lbs. This results in a change to the monthly average mass limit from 2193.04 lbs/day to 2161.81 lbs/day.

6. Page 20 of the Fact Sheet – Section 13.b.iii (Dioxin):

The wording “Louisiana standard” should be changed to reflect “limit cited in the Louisiana Water Quality Regulations”.

7. Page 20 of the Fact Sheet – Section 13.b.iii (Chloroform):

The word “out” in the first sentence under this section should be changed to reflect “outfall”.

Under item (i), the phrase “paragraph (a) of this section” should be changed to reflect “40 CFR 430.02(a)”.

Under item (ii), the phrase “paragraph (f)(2)(i) of this section” should be changed to reflect “40 CFR 430.02(f)(2)(i) as indicated below”.

8. Page 21 of the Fact Sheet – Section 13.b.iii (Chloroform):

Under item (iii), the phrase “paragraph (f)(2)(i) of this section” should be changed to reflect “40 CFR 430.02(f)(2)(i)”.

9. Page 22 of the Fact Sheet – Section 13.b.iii (Plywood and Studmill):

In the last sentence in the fourth section, place a space between “Part 429” and “that”. Remove the extra “e” from the word discharge.

In the fifth section, change “include” to “including”.

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10. Page 22 of the Fact Sheet – Section 13.b.iii (Chemical Plant):

In the third section, change “430” to “414” and the wording “Thermosetting Resins” for this citation to “Commodity Organic Chemicals”.

11. Page 23 of the Fact Sheet – Section 13.b.iii (Chemical Plant):

In the fifth section, no additional allocations for discharges from the Chemical Plant were added to the overall limits for BOD5 and TSS. Please indicate whether this methodology is being retained from the current permit.

12. Page 39 of the Fact Sheet – Section 16 (Permit Compliance):

There is language that specifies that compliance is required on the effective date of the permit except as outlined below in Item #3. Item #3 is not listed in this section.