

# ADEQ

ARKANSAS  
Department of Environmental Quality

**OCT 04 2017**

Mr. Bryant T. Champion  
Senior Vice President  
Environmental Affairs & Product Safety  
Georgia Pacific, LLC  
133 Peachtree St. NE  
Atlanta, GA 30303

Ms. Maureen Miller  
Corporate SHE Director  
Ingevity Corporation  
5555 Virginia Avenue  
North Charleston, SC 29406

RE: Georgia Pacific Crossett, LLC  
AFIN: 02-00013, NPDES Permit No. AR0001210

Dear Mr. Champion and Ms. Miller:

The Arkansas Department of Environmental Quality (ADEQ) is in receipt of your letter of September 15, 2017 concerning the pending sale of Georgia-Pacific Chemicals, LLC's (GP) tall oil fractionation plant (the TOFRAC Plant) to Ingevity Arkansas, LLC (Ingevity). The TOFRAC Plant is contained within GP's Chemical Plant located in Crossett, Arkansas.

ADEQ understands Ingevity and GP have agreed that GP will continue to treat wastewater from the TOFRAC Plant and that this transaction will not change GP's wastewater treatment process for the TOFRAC Plant. ADEQ also understands the closing date of the transaction is pending regulatory approval and cannot be ascertained at this time.

In anticipation of this transaction, ADEQ will amend the pending permit renewal to include a condition that the parties establish and maintain a written agreement providing for the continued treatment of the TOFRAC Plant's process wastewater and stormwater by GP. This agreement shall require that GP's treatment of the TOFRAC Plant's process wastewater and stormwater comply with the terms and conditions of applicable permits, including NPDES Permit No. AR0001210. Such agreement shall be submitted to ADEQ once the transaction is final.

During the period the permit renewal is pending, this letter will serve as authorization for GP to continue treatment of the TOFRAC process wastewater and stormwater after completion of the planned divestiture of the GP's TOFRAC Plant to Ingevity.

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If you have any questions or desire further information please contact me at (501) 682-0655 or [osbornec@adeq.state.ar.us](mailto:osbornec@adeq.state.ar.us).

Sincerely,



Caleb J. Osborne *FOR:*  
Associate Director, Office of Water Quality

C: Sarah Ross, GP (via email)  
Duane Mummert, P. E. ([duane.mummert@ingevity.com](mailto:duane.mummert@ingevity.com))  
Loretta Reiber, P.E., ADEQ Office of Water Quality