

A R K A N S A S Department of Environmental Quality

AUG 07 2015

Gary Kaiser, VP – Manufacturing Georgia-Pacific LLC – Crossett Paper Operations 100 Mill Supply Road Crossett, AR 71635

RE: NPDES Permit No. AR0001210, AFIN 02-00013

Dear Mr. Kaiser:

The Department is in the process of reviewing the application for modification of the above mentioned NPDES Permit which was received on May 27, 2015, with all additional information received by June 30, 2015, as well as the e-mail from Georgia-Pacific LLC dated August 7, 2015. After a review of the application to modify the referenced permit, the Department has determined that a State Construction Permit is not necessary.

Based on the May 27th application, it is the Department's understanding that Georgia-Pacific LLC (GP) is requesting permission to add Hydrogen Peroxide and an Iron Catalyst at three points in the upper areas of the wastewater collection and treatment system. This will require installation of pumps and tanks at each of the points (P2 Sewer at the manufacturing site, just upstream of the Clarifier, and at the Chemical Plant). The purpose of these additions is to control odor, not to provide treatment of the wastewater.

As allowed in Reg. 6.202(C), the Department has determined that the proposed modifications could be "minor revisions" to the treatment system and therefore not require a State Construction Permit. The Department has reviewed the application to modify the NPDES permit and is satisfied that the addition of the tanks and pumps needed to add the Hydrogen Peroxide and Iron Catalyst for odor control are minor revisions to the treatment system and will not require GP to obtain a State Construction Permit for this activity.

If you have any questions, please contact Loretta Reiber, P.E. of the NPDES Permit Section at reiber@adeq.state.ar.us or at (501) 682-0612.

Sincerely,

Mo Shafii

Assistant Chief, Water Division

MS:lr

cc: Richard Healey, Enforcement Branch Manager

Jason Bolenbaugh, Field Services Branch Manager

Rachel Johnson, Georgia-Pacific LLC (rachel.johnson2@gapac.com)