

ADEQ

ARKANSAS
Department of Environmental Quality

OCT 25 2019

D. Anthony Robinson
Environmental Manager
Georgia-Pacific Crossett LLC – Crossett Paper Operations
P.O. Box 333
Crossett, AR 71635

RE: NPDES Permit No. AR0001210, AFIN 02-00013
Request to Run pH Adjustment Trial

Dear Mr. Robinson:

The Office of Water Quality (OWQ) has reviewed your request dated October 8, 2019, to conduct a pH adjustment trial (Trial). Based on your October 8, 2019, correspondence, it is the Department's understanding that adjustment of the pH may be necessary due to significant process changes occurring at the paper mill which will affect the wastewater characteristics. It is also the Department's understanding that Georgia-Pacific Crossett LLC – Crossett Paper Operations (GP) will inject carbon dioxide or acid upstream of Outfall 001 and SMS 002.

Based on the OWQ's understanding as outlined in the preceding paragraph, the OWQ has no objection to the Trial provided GP complies with the following:

1. GP must continue to comply with the terms and conditions of NPDES Permit No. AR0001210;
2. GP must notify the OWQ within 24 hours of the start of the trial and again no later than 24 hours after the study has concluded. These notifications may be done through email;
3. GP must provide SDS for all pH adjustment chemicals prior to usage;
4. If GP chooses to make the pH adjustment permanent, all necessary permit applications must be submitted to OWQ as soon as practicable;
5. The length of the Trial must not exceed 12 months (i.e., 366 days);
6. The monitoring frequency for pH must increase to a minimum of five per week after the Trial has commenced. GP may request that this frequency be reduced to what is required in the permit six months after the Trial has commenced; and
7. GP must submit a report within 30 days of the end of the Trial. This report must include the results of the Trial and any action to be taken by GP as a result of the Trial.

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

Sincerely,



for
Bryan Leamons, P.E.
Senior Operations Manager

cc: Richard Healey, Enforcement Branch Manager
Jason Bolenbaugh, Compliance Branch Manager