

Georgia-Pacific Consumer Operations LLC Consumer Products

Crossett Paper Operations 100 Mill Supply Road P.O. Box 3333 Crossett, AR 71635 (870) 567-8000 (870) 364-9076 (fax) www.qp.com

November 8, 2019

Loretta Carstens, P.E. Water Division Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Reference:

Georgia-Pacific Crossett LLC - Crossett Paper Operations

NPDES Permit # AR0001210, AFIN 02-00013

pH Adjustment Trial

Dear Mrs. Carstens:

Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations (GP) received approval from ADEQ to run a pH adjustment trial by letter dated October 25, 2019. In working with vendors to provide carbon dioxide to the SMS 002 location, concerns have been expressed with being able to reliably deliver the CO₂ chemical due to road conditions during rainy periods. This concern has led us to investigate additional alternatives. Experience at other GP locations has indicated that algal growth tends to be more concentrated near the surface of the water and pH levels have been observed to decrease as you go lower in the water column. Based on this observation and as part of this trial, we would like to install a weir plate ahead of SMS 002, which would force an underflow discharge. See attached drawing.

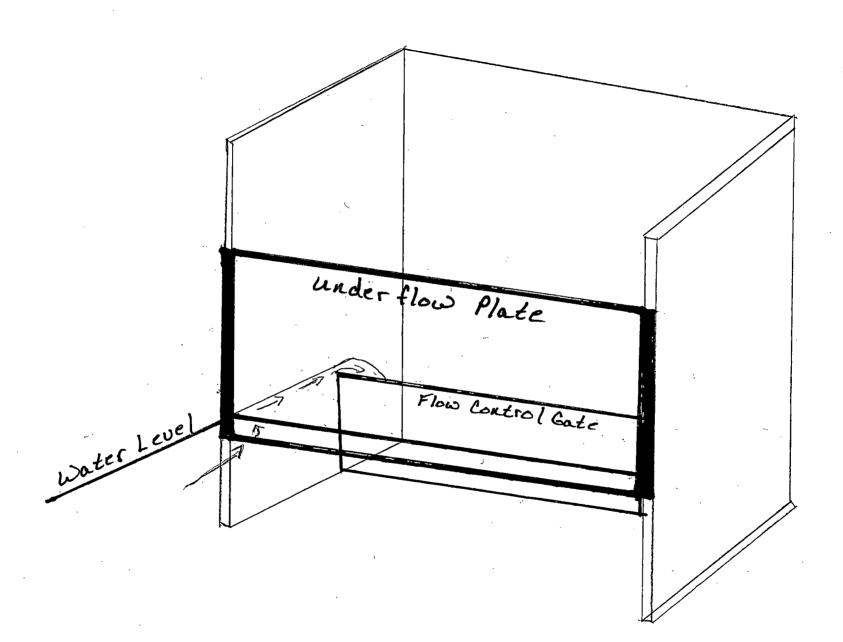
Also, as part of the CO_2 injection systems at both Outfall 001 and SMS 002, continuous pH monitoring will be added near the discharge point in order to control CO_2 dosage. From our discussion on October 29, 2019, with Dr. Bob Blanz, it is our understanding that this continuous pH monitoring data would be considered operational data for process control purposes and would not be subject to the compliance reporting required by the NPDES permit. Compliance with pH limits would still be based on grab samples, which will be collected 5 days per week for the trial period, as outlined in your October 25, 2019 letter.

Given the compliance obligations associated with this trial, we request ADEQ concurrence on the above two items at its earliest convenience.

If you have any questions or need additional information prior to this, please feel free to contact Rachel Johnson at (870 500-3772 or me at (870) 415-1862 or by email at anthony.robinson1@gapac.com.

Sincerely,

D. Anthony Robinson
Environmental Manager
Crossett Paper Operations



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