



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
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www.gp.com

October 25, 2024

Loretta Carstens
Permit Engineer
Office of Water Quality
Arkansas Division 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**
Mercury Minimization Plan Annual Report

Dear Ms. Carstens:

On September 1, 2011, Georgia-Pacific Crossett LLC, Crossett Paper Operations originally submitted a Mercury Minimization Plan as required by Condition No. 20 of Part II of the current NPDES Permit #AR0001210. This 2024 annual report is an outline of activities performed over the past year in accordance with the original 2011 plan.

Summary of Potential Significant Sources

As described in the plan, mercury may be introduced in trace amounts in both raw materials and chemicals used in the mill. It is not expected that any process changes in the mill over the past year would increase the potential sources described in the plan, nor have there been any significant additions in the types of chemicals used that contain mercury. In October 2019, the mill permanently shut down its bleached board machines, woodyard, pulp mill, bleach plant and solid fuel boilers. This has significantly reduced the mill's overall environmental footprint. Demolition activities were completed for the pulp mill, recovery area and two (2) of the power boilers as well as the former black liquor basin. The mill plans to demolish the bleach plant during a future phase of the demolition plan. BMPs have been and will be utilized to reduce the impact of stormwater runoff to the wastewater treatment system from demolition.

Control Measures

Public Education

Public education materials were mailed to all City of Crossett water users during the fall of 2011, instructing them on the dangers of mercury contamination and proper disposal of mercury containing devices. In addition, notes are routinely included on water bills and a notice was run on the local cable channel, letting residents know that mercury containing devices could be dropped off at the Crossett City Hall for proper disposal. A notice was last mailed out to City of Crossett residents on the routine water bill in December of 2023, and the City plans to mail notices again in December of 2024.

Crossett Paper Operations provides training to employees on the proper collection and disposal of potentially hazardous or universal wastes, including mercury waste. This was last done in 2023 and will be made available annually to active employees.

Collection Activities

The Crossett City Hall has designated a collection location for all mercury and mercury containing devices brought by residents for disposal. For Crossett Paper Operations, the Environmental Department is responsible for collecting and shipping mercury wastes to the proper disposal facilities. Over the past year, the facility has collected and shipped offsite for recycling approximately 800 lbs. of mercury containing fluorescent lamps.

Source Reduction Activities

There are various programs in place to minimize spills and releases throughout the mill, including methods for housekeeping, spill control and collection. Best management systems include tank and process vessel integrity testing, high level alarms, spill collection and control equipment, secondary containment and area curbing. Work practices include risk assessments, preventive maintenance, and inspections. Demolition areas utilize silt fencing, straw waddles and other BMPs as necessary to protect stormwater drainage to the wastewater treatment system.

All chemicals used at GP are subject to a chemical review and approval for applicable regulatory and internal GP requirements. Before new chemicals are ordered and brought onsite, they are reviewed using the New Substance Review (NSR) process in order to determine proper compliance assurances, management and reporting requirements associated with their use.

Monitoring

Over the past year, quarterly sampling has been performed at various points in the mill and at the wastewater treatment system, including Outfall 001 and the discharge from the City of Crossett. A summary of the results is as follows:

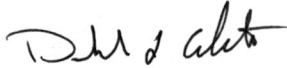
| | Hg in ug/L | | | | |
|--------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| | 3rd Quarter 2023 | 4th Quarter 2023 | 1st Quarter 2024 | 2nd Quarter 2024 | 3rd Quarter 2024 |
| GP Lake (Influent) | 0.0012 | 0.0013 | 0.0024 | ND | 0.0012 |
| #6&7 Tissue | 0.0019 | ND | 0.0024 | 0.0015 | 0.025 |
| Process Sewer 1 | 0.0015 | 0.025 | 0.0022 | ND | 0.0042 |
| Process Sewer 2 | ND | ND | 0.0023 | ND | 0.020 |
| Process Sewer 3 | ND | 0.0057 | 0.0051 | 0.0019 | ND |
| City of Crossett | ND | 0.0011 | 0.0064 | 0.0017 | 0.0030 |
| Outfall 001 | ND | 0.0022 | 0.0020 | ND | 0.0017 |

We believe that mercury contributions in most of the in-plant sources are not directly related to any process activities. The average level measured at Outfall 001 for the last four quarters is 0.002 ug/L. As documented in the TMDL for the Ouachita River¹, most mercury in the basin is the result of air deposition. Given the very low levels of mercury measured in the effluent, we do not believe that any changes are necessary to this successful pollution prevention program.

If you have any questions regarding this submittal, please feel free to contact Rachel Johnson at (870) 500-3772 or by email at rachel.johnson2@gapac.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Deborah Coduto
Vice President of Manufacturing

¹ "TMDLs for Segments listed for Mercury in Fish Tissue for the Ouachita River Basin, and Bayou Bartholomew, Arkansas and Louisiana to Columbia", FTN Associates for US EPA VI, December 18, 2002.

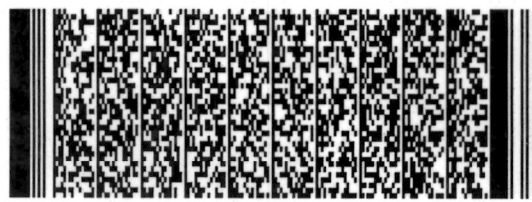
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DROP POINT 33
CROSSETT, AR 71635
UNITED STATES US
BILL SENDER

TO LORETTA CARSTENS
ARKANSAS DEPART OF ENV QUALITY
5301 NORTSHORE DRIVE

NORTH LITTLE ROCK AR 72118
(501) 682-0612 REF:
INV: DEPT:
PO:

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