



Georgia-Pacific LLC
Consumer Products

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

October 29, 2012

Loretta Reiber
Permit Engineer
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific LLC: Crossett Paper Operations
NPDES Permit # **AR0001210**
Mercury Minimization Plan Annual Report

Dear Ms. Reiber:

On September 1, 2011 Georgia-Pacific LLC, Crossett Paper Operations submitted a Mercury Minimization Plan as required by Condition No. 20 of Part II of the current NPDES Permit #AR0001210. Below is an outline of activities performed over the past year in accordance with the 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. There have been no significant process changes over the past year, which would impact the potential sources described in the plan. There have also been no significant changes in the types of chemicals used.

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 have been 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.

Crossett Paper Operations annually trains all employees on the proper collection and disposal of any potentially hazardous or universal wastes, including mercury waste. This was last done in fourth quarter of 2011 and will be completed again by the end of fourth quarter of 2012.

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. Semi-annual events are held to encourage employees to bring items for disposal. Over the past year the facility has collected and shipped offsite for recycling approximately 7 lbs of mercury containing devices.

Source Reduction Activities

The mills have 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, surveillance and inspections.

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

Monitoring

Over the past year, quarterly sampling has been initiated at various points in the mill and at the waste water treatment plant, including Outfall 001 and the discharge form the City of Crossett. A summary of the results is as follows:

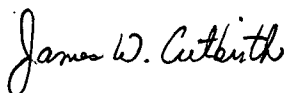
	Hg in ug/L				
	3rd Quarter 2011	4th Quarter 2011	1st Quarter 2012	2nd Quarter 2012	3rd Quarter 2012
Outfall 001	0.0017	0.0055	0.0036	ND	0.0033
City of Crossett	ND	ND	ND	ND	0.0601
Plywood Plant	0.0019		Plant idle - No Sample		
Chemical Plant	0.0088	ND	0.032	ND	ND
Fine Paper	ND	ND	ND	ND	ND
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	ND	ND	ND	ND	0.0018

#4&5 Tissue	ND	ND	ND	ND	ND
#6&7 Tissue	0.021	ND	ND	ND	ND
Board Mill	0.0028	ND	0.0020	ND	ND
Pulp Mill Digesters	ND	ND	ND	ND	ND
GP Lake (Influent)	0.0036	ND	0.0031	ND	0.00073
Process Sewer 1	0.0025	ND	ND	ND	0.0025
Process Sewer 2	ND	ND	ND	ND	ND
Process Sewer 3	0.0067	ND	ND	ND	0.025

We believe the above results indicate that mercury contributions are largely non-detectable in most of the in-plant sources, and the occasional detectable concentrations are not directly related to any process activities. The average level measured at Outfall 001 for the last four quarters is 0.0031 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 or need additional information, please feel free to contact me at (870) 567-8144 or by email at james.cutbirth@gapac.com.

Sincerely,



James W. Cutbirth
Environmental Manager

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.

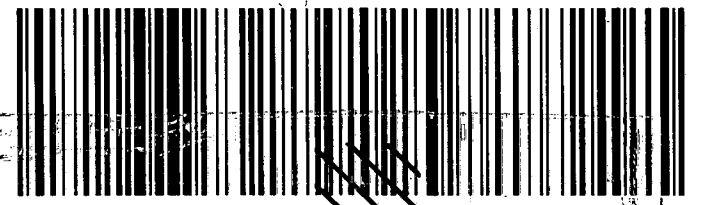
earthsmart
 FedEx carbon-neutral
 envelope shipping

FedEx
 TRK# 7939 6341 6819
 0201

THU - 01 NOV A4
 PRIORITY OVERNIGHT

72118
 AR-US
 LIT

X2 LITA



Emp# 775476 31OCT12 LITA 515C1/9CC0/6F93

FedEx

Express

Envelope

Press here to seal

Sender You must seal flap before shipping.

Press here to seal.

11:30:52 Wednesday, October 31, 2012

SAVE GOTO OPAR INQUIRY TODAY'S DATE 10312012
 TRK NO 793963416819 FI 0201 SHIP DT 10302012 TU CASH ONLY: N HANDLING CODES:
 SHPR CO: Georgia-Pacific RCPT CO: ADEQ 02-DELIVER WEEKD
 NAME: Becky Blankenship NAME: LORETTA REIBER
 ADDR: 100 Supply Road ADDR: 5301 NORTSHORE DR
 CITY: CROSSETT CITY: NORTH LITTLE ROCK
 ST: AR CY: US POSTAL: 72118 SVC: 01 06
 CURR SVC CMT: DATE/TIME SOURCE: CHRON INVOICE NBR:
 TCN/SRN: MMP ANNUAL REPORT WGT: .50 L TOT PKGS: 1 PAGE 007
 DECLARED VALUE: .00 PAY TYPE: BILL SENDER SHIP 01 OF 01
 SEL TRAK O DATE TIME LOCID EMP SRC SVC STATUS/COMMENTS

© 2011 FedEx 158396 REV 1/11

Align bottom of peel and stick airbill here.