



Georgia-Pacific LLC
Consumer Products

Crossett Paper Operations
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October 31, 2013

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 2012 and will be completed again by the end of fourth quarter of 2013.

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 5 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 from the City of Crossett. A summary of the results is as follows:

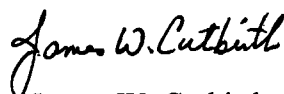
	Hg in ug/L				
	3rd Quarter 2012	4th Quarter 2012	1st Quarter 2013	2nd Quarter 2013	3rd Quarter 2013
Outfall 001	0.0033	0.0068	0.0047	0.0021	ND
City of Crossett	ND	0.0028	0.011	0.0022	0.0013
Plywood Plant	Plant idle - No Sample				
Chemical Plant	ND	0.0048	ND	ND	0.0085
Fine Paper	ND	ND	0.0014	ND	ND
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	0.0018	0.0011	ND	ND	ND

#4&5 Tissue	ND	ND	0.0061	0.0026	0.0015
#6&7 Tissue	ND	ND	0.0072	ND	0.0032
Board Mill	ND	0.0025	0.0032	ND	0.0081
Pulp Mill Digesters	ND	0.0016	ND	ND	0.0011
GP Lake (Influent)	0.00073	0.0012	0.0012	ND	0.0017
Process Sewer 1	0.0025	0.0029	ND	ND	0.0020
Process Sewer 2	ND	ND	ND	ND	ND
Process Sewer 3	0.025	0.047	0.015	ND	0.011

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 0.0045 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.



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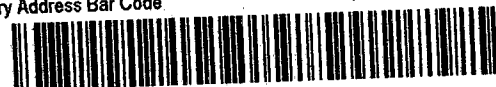
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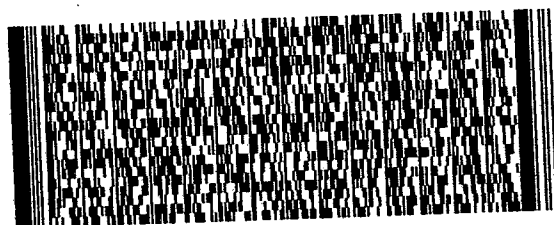
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