



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
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October 30, 2015

Loretta Reiber
Permit Engineer
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**
Mercury Minimization Plan Annual Report

Dear Ms. Reiber:

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 2015 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. There have been no significant process changes over the past year, which would impact the potential sources described in the plan, nor have there been any significant changes in the types of chemicals used that contain mercury.

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.

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 the fourth quarter of 2014 and will be completed again by the end of fourth quarter of 2015.

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. Annual events are held to encourage employees to bring mercury containing items for proper disposal. Over the past year, the facility has collected and shipped offsite for recycling approximately 2 lbs. of mercury waste.

Effluent Guidelines Review

EPA is preparing to issue final pretreatment standards for discharges to publicly-owned treatment works from Dental offices (i.e., disposal of old mercury containing fillings at dental offices). The rule was proposed on October 22, 2014 as described in the Federal Register notice at <http://www.gpo.gov/fdsys/pkg/FR-2014-10-22/pdf/2014-24347.pdf>. This rule has yet to be finalized. GP will communicate with the City of Crossett about contacting local dentists regarding any necessary pretreatment measures once the rule becomes final.

Precipitation

A review of the data at the closest air deposition monitoring site show no changes in data collected since 2010. Previous reports had estimated the mercury load from precipitation as 11.1 ng/l.

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, and inspections.

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) 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 wastewater 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	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter
	2014	2014	2015	2015	2015
Outfall 001	ND	0.0030	0.0024	ND	ND
City of Crossett	0.0013	ND	0.0023	ND	0.0022
Fine Paper	ND	ND	0.0030	0.0047	0.0028
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	ND	ND	ND	0.0013	ND
#4&5 Tissue	0.0014	ND	ND	ND	ND
#6&7 Tissue	0.0016	0.0012	0.0011	0.0010	ND
Board Mill	ND	0.0014	0.0038	0.0023	ND
Pulp Mill Digesters	ND	ND	ND	ND	ND
GP Lake (Influent)	0.0002	0.0026	0.0024	0.0023	0.0028
Process Sewer 1	0.0037	ND	0.0046	0.0030	0.0021
Process Sewer 2	ND	ND	ND	ND	ND
Process Sewer 3	ND	0.0011	0.0047	0.0023	0.012

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 0.0027 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) 567-8170 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,



Gary W. Kaiser
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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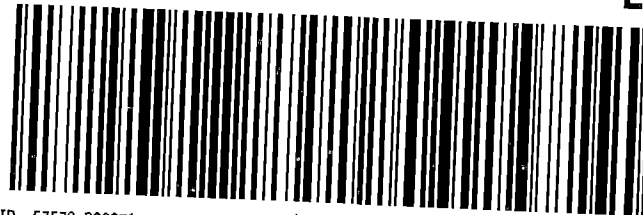


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