



Georgia-Pacific Crossett 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.gp.com

October 30, 2017

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 2017 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 increase or 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. A notice was last mailed out to City of Crossett residents on the October of 2017 water bill.

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 2016 and will be completed again by the end of 2017.

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 726 lbs. of mercury containing fluorescent lamps and thermostats.

Effluent Guidelines Review

EPA has issued 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 finalized on June 14, 2017. GP will communicate the requirements of the federal rule to the City of Crossett; however, the ultimate enforcement of the requirements and compliance with this rule will be enacted by the ADEQ.

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

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.

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 performed 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 2016	4th Quarter 2016	1st Quarter 2017	2nd Quarter 2017	3rd Quarter 2017
Outfall 001	0.0082	0.0029	0.012	0.0027	0.0020
City of Crossett	0.150	0.0036	0.0034	0.013	0.0026
C2 Board Machine	0.0013	ND	0.0027	0.0019	0.082
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	0.0039	ND	ND	ND	ND
#4&5 Tissue	0.0011	ND	ND	ND	ND
#6&7 Tissue	0.0035	ND	0.0094	0.0040	0.0026
C3 Board Machine	0.0023	0.0014	0.0013	0.0099	0.0042
Pulp Mill Digesters	0.0044	ND	ND	0.0021	ND
GP Lake (Influent)	0.030	0.0011	0.0053	0.0048	0.0015
Process Sewer 1	0.038	0.0025	ND	0.073	0.092
Process Sewer 2	ND	ND	0.0057	ND	ND
Process Sewer 3	0.0038	0.0021	0.0014	0.0039	0.0013

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 0.0049 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,



Michael L. Hohnadel
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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PRIORITY OVERNIGHT

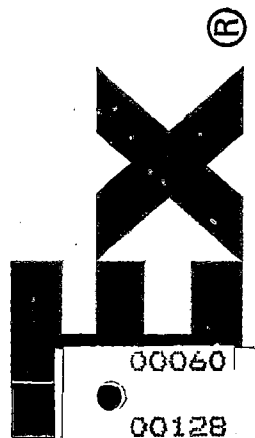
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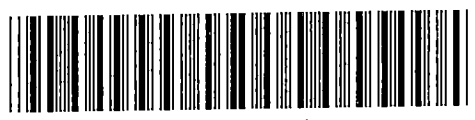
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Company GEORGIA PACIFIC/ENVIRONMENTAL
Address 100 SUPPLY RD
City CROSSETT State AR ZIP 71635

2 Your Internal Billing Reference

3 To
Recipient's Name Loretta Reiber Phone 501 682-0612
Company AR Dept. of Env. Quality
Address 5301 Northshore Drive
City North Little Rock State AR ZIP 72118



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Form ID No. 0215

4 Express Package Service *To most locations.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

FedEx Envelope* FedEx Pak** FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required.

Dry Ice
Dry Ice, 9, UN 1845 _____ x _____ kg

Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. in Section 1 will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages 1 Total Weight 1 lbs.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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