



Georgia-Pacific Consumer Operations LLC
Consumer Products

Crossett Paper Operations
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www.gp.com

October 30, 2019

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

Reference: Georgia-Pacific Consumer Operations LLC: Crossett Paper Operations
NPDES Permit # **AR0001210, AFIN 02-00013**
Mercury Minimization Plan Annual Report

Dear Ms. Carstens:

On September 1, 2011, Georgia-Pacific Consumer Operations 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 2019 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. Early this month, the mill permanently shut down its bleached board machines, woodyard, pulp mill, and solid fuel boilers. This should significantly reduce the mill's overall environmental footprint.

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 October 30, 2018 and the city plans to mail notices again in October of 2019.

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 2018 and will be completed again by the end of 2019.

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 19 lbs of mercury devices and 1,989 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.

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:

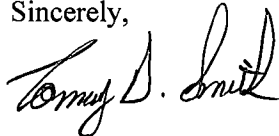
	Hg in ug/L				
	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter
	2018	2018	2019	2019	2019
Outfall 001	0.0038	0.0021	0.0030	0.0038	0.0031
City of Crossett	0.0028	0.012	0.018	0.0028	0.0015
C2 Board Machine	0.0012	0.0023	0.0011	0.0016	0.0020
Recovery Area	0.0032	ND	ND	0.0031	ND
Pulp Mill Washers	ND	ND	ND	ND	ND
#4&5 Tissue	0.002	ND	0.011	ND	ND
#6&7 Tissue	0.0041	0.0045	0.012	0.0027	0.0046
C3 Board Machine	0.0019	ND	0.0047	0.0011	0.0030
Pulp Mill Digesters	0.0054	0.0060	0.0060	0.0078	0.0027
GP Lake (Influent)	0.0039	0.0015	0.0042	0.0042	0.0012
Process Sewer 1	0.0039	0.0018	0.0069	0.071	0.0041
Process Sewer 2	ND	ND	0.0011	0.0064	ND
Process Sewer 3	0.0011	0.0061	0.014	0.0092	0.0055

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 0.0030 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.

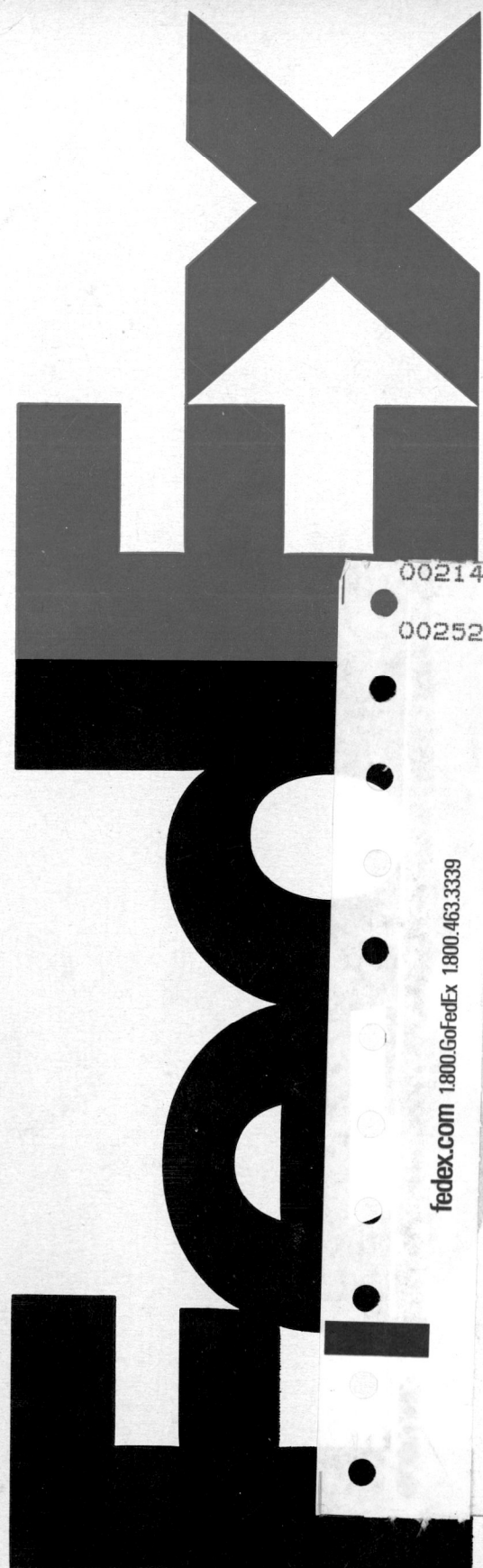
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Sincerely,



Tommy D. Smith
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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City CROSSETT State AR ZIP 71635

2 Your Internal Billing Reference

3 To

Recipient's Name Loretta Carstons Phone 501 682-0662

Company AR Dept of Env. Quality

Address 5301 Northshore Drive

City North Little Rock State AR ZIP 72118

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☐ FedEx Standard Overnight
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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**
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☐ **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** One box must be checked.
As per attached Shipper's Declaration.

☐ **Yes** Shipper's Declaration not required.

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

Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ **Cargo Aircraft Only**

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