



Georgia-Pacific Consumer Operations LLC  
Consumer Products

Crossett Paper Operations  
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Crossett, AR 71635  
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(870) 364-9076 (fax)  
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October 22, 2021

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 2021 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. It is not expected that any process changes in the mill over the past year would increase the potential sources described in the plan, nor have there been any significant additions in the types of chemicals used that contain mercury. In October 2019, the mill permanently shut down its bleached board machines, woodyard, pulp mill, bleach plant and solid fuel boilers. This has significantly reduced 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, 2020 and the City plans to mail notices again in November of 2021.

Crossett Paper Operations provides training to employees on the proper collection and disposal of potentially hazardous or universal wastes, including mercury waste. This was last done in of 2020 and will be made available annually to active employees.

**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 12 lbs of mercury containing waste and 4,325 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) process 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:

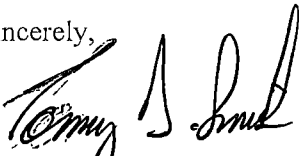
	Hg in ug/L				
	3rd Quarter 2020	4th Quarter 2020	1st Quarter 2021	2nd Quarter 2021	3rd Quarter 2021
GP Lake (Influent)	0.0024	0.0014	0.0020	0.0043	0.0040
#6&7 Tissue	0.0059	ND	0.0019	0.0057	0.0046
Process Sewer 1	0.0039	0.0013	ND	0.0038	0.0032
Process Sewer 2	ND	ND	ND	0.0051	0.0036
Process Sewer 3	0.0051	ND	ND	0.0027	0.0083
City of Crossett	0.0012	0.0031	0.0017	0.0028	0.0034
Outfall 001	0.0084	0.0017	0.0012	ND	0.0010

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 0.0012 ug/L. As documented in the TMDL for the Ouachita River<sup>1</sup>, 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) 500-3772 or by email at [rachel.johnson2@gapac.com](mailto: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,



Tommy D. Smith  
Vice President of Manufacturing

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<sup>1</sup> "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.

ORIGIN ID:ELDA (870) 567-8812  
RACHEL JOHNSON  
GEORGIA-PACIFIC  
100 SUPPLY ROAD  
DROP POINT 33  
CROSSETT, AR 71635  
UNITED STATES US

SHIP DATE: 22OCT21  
ACTWGT: 1.00 LB  
CAD: 102787395/NET4400

BILL SENDER

TO **LORETTA CARSTENS, PERMIT ENGINEER**  
**ADEQ**  
**5301 NORTSHORE DR**

**NORTH LITTLE ROCK AR 72118**

(501) 682-0612

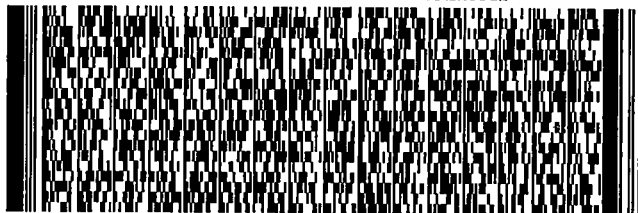
REF: MERCURY MINIMIZATION REPORT

INV:

PO:

DEPT:

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