



Georgia-Pacific Consumer Operations 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 26, 2020

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 2020 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 will 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, 2019 and the City plans to mail notices again in November of 2020.

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 2019 and will be completed again by the end of 2020.

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) 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:

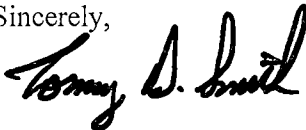
	Hg in ug/L				
	3rd Quarter 2019	4th Quarter 2019	1st Quarter 2020	2nd Quarter 2020	3rd Quarter 2020
Outfall 001	0.0031	0.0051	0.0028	0.0015	0.0084
City of Crossett	0.0015	0.0031	0.0038	0.0029	0.0012
#6&7 Tissue	0.0046	0.0052	0.0028	0.0021	0.0059
GP Lake (Influent)	0.0012	0.061	0.0023	0.0020	0.0024
Process Sewer 1	0.0041	0.0084	0.0043	0.0017	0.0039
Process Sewer 2	ND	0.0050	ND	0.0027	ND
Process Sewer 3	0.0055	0.029	0.0052	0.0014	0.0051

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 0.0045 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 regarding this submittal please feel free to contact Rachel Johnson at (870) 500-3772 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,

A handwritten signature in black ink, appearing to read "Tommy D. Smith". The signature is fluid and cursive, with the first name "Tommy" being more prominent.

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.

00103
00252

FedEx Express
Package US Airbi

RT **178**
FZ **177**
1 10:30 A 0118
10.28

Form ID No. **021**

4 Express Package

Next Business Day

☐ FedEx First Overnight
Earliest next business morning
locations. Friday shipment
Monday unless Saturday D.

☒ 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.

☐ Second business morning.
will be delivered on Monday unless Saturday
Delivery is selected.

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

FID: 57579 270ct2020 ELDA 56DG2/A27E/05A2

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

Restrictions apply for dangerous goods — see the current FedEx Service Guide.

7 Payment Bill to:

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

☒ Sender
I will be billed.

☐ Recipient

☐ Third Party

☐ Credit Card

☐ Cash/Check

Total Packages

Total Weight

lbs.

Credit Card Auth.

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

Rev. Date 5/15 • Part #163134 • ©1994–2015 FedEx • PRINTED IN U.S.A. SRM

fedex.com 1800.GoFedEx 1800.463.3339

1 From

Date **10-23-20**

Sender's Name **REBECCA BLANKENSHIP** Phone **870 567-8812**

Company **GEORGIA PACIFIC/ENVIRONMENTAL**

Address **100 SUPPLY RD** Dept./Floor/Suite/Room

City **CROSSETT** State **AR** ZIP **71635**

2 Your Internal Billing Reference

3 To

Recipient's Name **Loretta Carstens** Phone **501 682-0612**

Company **RDEG - Water Division**

Address **5301 Northshore Drive** Dept./Floor/Suite/Room

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address Use this line for the HOLD location address or for continuation of your shipping address.

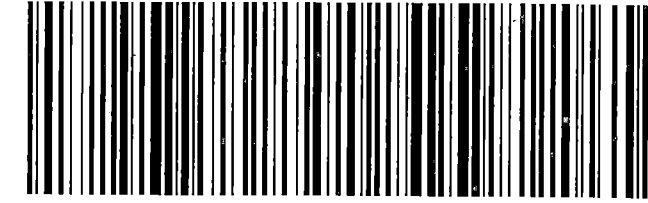
City **North Little Rock** State **AR** ZIP **72118**

8127 7709 0118

FedEx

TRK#
0215 8127 7709 0118

X2 LITA



WED - 28 OCT AA
PRIORITY OVERNIGHT

72118
AR-US
LIT

fedex.com 1800.GoFedEx 1800.463.3339

Insert shipping
document here.