



Georgia-Pacific Crossett LLC  
Consumer Products

Crossett Paper Operations  
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October 28, 2022

Loretta Carstens  
Permit Engineer  
Office of Water Quality  
Arkansas Division 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. Carstens:

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 2022 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. Demolition activities are currently underway for portions of the decommissioned facility. BMPs have been utilized to reduce the impact of stormwater runoff to the wastewater treatment system from demolition.

### **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 routine water bill on November 30, 2021 and the City plans to mail notices again in November of 2022.

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 2021 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 410 lbs of mercury containing fluorescent lamps. In addition, demolition activities have resulted in approximately 22 lbs of mercury containing waste and 2,090 lbs. of mercury containing fluorescent lamps being collected and shipped offsite for recycling.

### 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. Demolition areas utilize silt fencing, straw waddles and other BMPs as necessary to protect stormwater drainage to the wastewater treatment system.

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 system, including Outfall 001 and the discharge from the City of Crossett. A summary of the results is as follows:

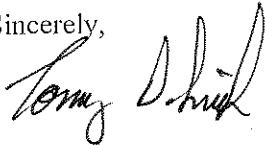
	Hg in ug/L				
	3rd Quarter 2021	4th Quarter 2021	1st Quarter 2022	2nd Quarter 2022	3rd Quarter 2022
GP Lake (Influent)	0.0040	0.0020	0.0055	0.0014	0.0028
#6&7 Tissue	0.0046	ND	0.0012	0.0011	0.0031
Process Sewer 1	0.0032	ND	0.0027	0.0016	0.0028
Process Sewer 2	0.0036	0.0017	ND	0.0022	0.0038
Process Sewer 3	0.0083	0.0015	0.0020	0.0011	0.0026
City of Crossett	0.0034	0.0014	0.0021	0.0018	0.0024
Outfall 001	0.0010	ND	0.0010	0.00098	0.0021

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 0.0013 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.