



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

March 1, 2017

Caleb Osbourne
Associate Director, Office of Water Quality
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
Notification of Source Control Measures for Sulfides

Dear Mr. Osborne:

By letter dated March 8, 2016, Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) was previously granted permission to run a trial using hydrogen peroxide and an organic iron catalyst to control a concentrated source of sulfide (green liquor dregs) within the mill manufacturing process. The trial was initiated on April 4, 2016 and was found to be successful in reducing effluent sulfide concentrations. In June of 2016, a new dregs filter was installed which significantly reduced the sulfide loading in the effluent, making the continuous use of the chemicals to address green liquor dregs in this area unnecessary.

The mill has been evaluating other potential sources of sulfides in process streams (such as around the weak wash from the lime mud washer, unregulated evaporator condensates, etc.) and plans to conduct similar source reduction application of these chemicals in the same process areas to reduce sulfides in these streams. This source control step would utilize the same hydrogen peroxide and iron catalyst system as before. As a source control project (i.e. it is preventing sulfide from getting into the combined wastewater stream), GP does not believe permitting, or a modification to the permit is required since the chemical addition is well within the manufacturing process and upstream of the wastewater treatment system. A key objective of this project is the reduction of sulfides that enter the wastewater treatment system. Additionally, both chemicals have beneficial impacts for the environment: hydrogen peroxide readily degrades to oxygen and water upon use, and iron has been shown to reduce the potential for sublethal toxicity in the effluent and to control effluent phosphorus. Additionally, iron is already monitored in the final effluent.

If the ADEQ agrees with this position, GP plans to implement this source control measure as soon as possible, likely during the month of March 2017. Given the potential benefits associated with this source control measure, we request that ADEQ provide any feedback at its earliest convenience. If you have any questions or need additional information, please feel free to contact me at (870) 567-8670 or sarah.ross@gapac.com.

Sincerely,

A handwritten signature in black ink that reads 'Sarah M. Ross'.

Sarah M. Ross
Environmental Manager
Crossett Paper Operations



00015

00152

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ExpressPackage
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Tracking
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1 From

Date 3-1-17

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 Caleb Osborne

Phone

Company RDEG, Water Division

Address 5301 Northshore Drive

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State AR ZIP 72118

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