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July 30, 2021

Via email: leamons@adeq.state.ar.us

Bryan Leamons, P.E. | Senior Operations Manager
Division of Environmental Quality |
Office of Water Quality Permitting and Compliance
5301 Northshore Drive | North Little Rock, AR 72118

RE: NPDES Permit No. AR0001210, AFIN 02-00013
Odor Control Measures

Dear Mr. Leamons,

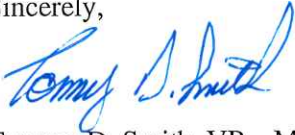
Please find our responses to your Odor Control Measures information request dated July 13, 2021:

1. *GP's process for evaluating when an odor management plan is needed and...*
 1. Based on current process knowledge and regular observations of the wastewater treatment system, odor control measures are not currently necessary.
 2. There are no activities planned or expected for the wastewater treatment system that would generate odors and require active odor management.
 3. Going forward, any planned changes to the wastewater treatment system would be evaluated as part of our facility management of change process. The evaluation would consider the potential for the activity to result in increased odors from the wastewater treatment system based on process knowledge. Depending on the nature of the change, we would consult outside expertise and resources.
2. *Methods to determine appropriate odor control measures.*
 1. Field observations and testing if needed (e.g., aqueous or airborne depending on the circumstances)
3. *The plan should identify how decisions are made when scheduling activities which may cause excessive odors, and...*
 1. As noted above, there are no currently planned activities that are expected to cause increased odors. Decisions for future odor control activities would be made based on the specific circumstances of the activity and be subject to approval by the Environmental and Compliance Leader as well as the Mill Manager.
4. *Discuss routine activities, and the associated best management practices to be expected during performance of those activities.*
 1. Routine activities at the wastewater treatment system including removing settled solids from conveyances do not generate significant odors.

5. *The plan should identify upcoming activities or provide a method for notifications or updates to the odor plan as needed.*
1. Upcoming activities include closure of the East and West Ash Settling Basins (Reference CAO LIS 19-002) – No odor expected.
 2. GP would notify ADEQ anytime an activity (not expected at this time) that has the potential to generate increased odor is planned and update the odor control measures.

Please contact Sarah Ross, Environmental and Compliance Leader, at Sarah.Ross@gapac.com or (870) 415-6363 if there are additional comments or questions.

Sincerely,



Tommy D. Smith, VP – Manufacturing
Georgia Pacific Consumer Operations LLC