



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
100 Mill Supply Road
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www.gp.com

July 26, 2017

Loretta Reiber, P.E.
Water Division
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, AFIN 02-00013
Request to Run Trial of Added Oxygen to the Primary Clarifier

Dear Ms. Reiber:

As we discussed, Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) intends to initiate a trial to apply oxygen prior to the primary clarifier as described in the wastewater treatment system schematic that was an approved part of our permit modification application dated October 31, 2015. This trial was approved by the agency in March of 2016, but was not initiated at that time. We are requesting your approval as soon as possible to begin this trial at this time.

GP presently applies hydrogen peroxide and an organic iron catalyst immediately upstream of the primary clarifier to oxidize sulfide in the wastewater. This reduces the potential for emissions of hydrogen sulfide from the primary clarifier. Additionally, since hydrogen peroxide decomposes into water and oxygen, this also provides an added boost of oxygen to the wastewater. Oxygen also rapidly oxidizes sulfide. Adding oxygen through this means and by aeration in the aeration basin is already part of our process, and is also necessary for proper degradation of organics.

In order to implement this trial, we will install an oxygen supply system (from a liquid oxygen supply tank) in the primary treatment area and dissolve the oxygen in a portion of the clarifier influent stream. This oxygenated stream will be reinjected back into the primary clarifier influent. The oxygen will be added in lieu of or in addition to the peroxide system in place.

There are several benefits of adding oxygen in this manner: (1) it reduces the potential for odors, (2) it increases the settling efficiency significantly of the primary clarifier by raising the oxidation-reduction potential in the settling zone, (3) the dewatering characteristics are improved since the settled sludge is more aerobic and (4) it meets immediate oxygen demands of some readily degraded substances. Additionally, the use of oxygen may reduce or eliminate the use of peroxide at this application point, thereby significantly reducing chemical costs and reducing safety risks from handling 50% hydrogen peroxide.

Our intention would be to run this trial for a period of up to 12 months. We would begin this trial as soon as we procure and install the equipment. During the trial period, if we determined that we would like to make the oxygen system a permanent installation, we will contact you to determine next steps. We will notify you upon trial completion.

If you have any questions or need additional information prior to this, please feel free to contact me at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,

A handwritten signature in black ink that reads "Sarah M. Ross". The signature is written in a cursive, flowing style.

Sarah M. Ross
Environmental Manager
Crossett Paper Operations