



# ARKANSAS

## ENERGY & ENVIRONMENT

Tommy D. Smith, VP of Manufacturing  
Crossett Paper Operations  
Georgia-Pacific Consumer Operations LLC  
P.O. Box 3333  
Crossett, AR 71635

04/22/2021

Re: NPDES Permit Number AR0001210; AFIN 02-00013  
Removal of Aerators from ASB

Dear Mr. Smith:

The Office of Water Quality (OWQ) has reviewed your correspondence dated March 3, 2021, regarding the removal of aerators from the Aerated Stabilization Basin (ASB). A request to remove the aerators was originally received on or about January 24, 2020. On March 6, 2020, OWQ responded with a letter requesting additional information.

Based on your March 3, 2021, correspondence, the anticipated significant reduction in oxygen demanding pollutant load is attributable to changes in facility operation and provides adequate basis for reducing the number of aerators in the ASB. It is the OWQ's understanding that there are currently 92 aerators in the ASB and that 82 of them will be removed from service. The remaining aerators will be operated as needed to treat the BOD<sub>5</sub> in the ASB influent, which currently averages approximately 5,000 lbs/day. The number of aerators in operation will be determined through weekly testing of the BOD<sub>5</sub> levels in the ASB influent. Continued monitoring of the process and effluent parameters will provide the ongoing rationale for the effective levels of aeration necessary for proper operation.

Based on the understanding outlined in the preceding paragraph and your earlier correspondence, the OWQ does not object to the removal of aerators as outlined in your January 24, 2020, and March 3, 2021, letters. Please note that this facility must continue to comply with the terms and conditions of NPDES Permit No. AR0001210 after the 82 aerators have been removed from service.

Should conditions change or the treatment system become unable to manage pollutant loads effectively in the future, additional equipment may be warranted to ensure permit compliance. Additional changes at the facility may require a state construction permit to allow equipment installation based on rules applicable at that time.

Please keep a copy of this correspondence with your NPDES permit and make available to OWQ personnel upon request. If you have any questions, please contact Loretta Carstens, P.E. of the NPDES Permits Section at [loretta.carstens@adeq.state.ar.us](mailto:loretta.carstens@adeq.state.ar.us) or by phone at (501) 682-0612.

Sincerely,

A handwritten signature in cursive script that reads 'Bryan Leamons'.

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

cc: Sarah Ross, Georgia-Pacific Consumer Operations, LLC ([sarah.ross@gapac.com](mailto:sarah.ross@gapac.com))