



Georgia-Pacific LLC  
133 Peachtree Street NE (30303-1847)  
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(404) 652-4776  
www.gp.com

September 18, 2017

**Bryant T. Champion**  
Sr. Vice-President, Environmental Affairs &  
Product Safety

**VIA E-MAIL (osborne@adeq.state.ar.us) AND  
CERTIFIED MAIL No. 7011 2000 0001 0129 5199  
RETURN RECEIPT REQUESTED**

Mr. Caleb Osborne  
Associate Director, Office of Water Quality  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR  
72118-5317

**Re: Georgia-Pacific Crossett LLC  
NPDES Permit No. AR0001210; AFIN: 02-00013**

Dear Mr. Osborne:

This letter is sent on behalf of Georgia-Pacific Crossett LLC ("GP") and Ingevity Arkansas, LLC ("Ingevity") in the wake of our meeting on September 5, 2017 with you and your staff regarding a pending transaction involving the tall oil fractionation facility (the "TOFRAC Plant") located within the chemical plant owned and operated by Georgia-Pacific Chemicals LLC in Crossett, Arkansas (the "GP Chemicals Plant"). As indicated during our September 5 meeting, GP recently announced the planned divestiture of the TOFRAC Plant to Ingevity. The planned divestiture includes a lease of the land underlying the TOFRAC Plant to Ingevity, who will then own and operate the TOFRAC Plant assets. The transaction is currently undergoing required regulatory reviews, and thus the closing date is not known at this time.

Pursuant to the above-referenced NPDES permit, GP currently treats the process wastewater and stormwater generated by the GP Chemicals Plant, including the TOFRAC Plant, in addition to other wastewater sources operated by GP and the City of Crossett. GP and Ingevity have agreed to maintain the same arrangement in the wake of the divestiture, with GP continuing to serve as the NPDES permittee and bearing ultimate responsibility for treating process wastewater and stormwater generated by Ingevity at the TOFRAC Plant. GP and Ingevity have agreed to several internal controls, including regular sampling of the TOFRAC Plant effluent by Ingevity, to assist GP with managing its compliance obligations under its NPDES permit.

With this letter, GP and Ingevity respectfully request the Arkansas Department of Environmental Quality's written approval for the continued treatment of the TOFRAC Plant

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September 18, 2017  
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effluent by GP upon closing of the transaction described above. GP and Ingevity have included a proposed letter of approval for your consideration.

Thank you again for your guidance on this matter and your prompt consideration of this request. If you or your staff need additional information, please do not hesitate to contact Traylor Champion of GP at 404-652-4776 or Maureen Miller of Ingevity at 843-746-8240.

Sincerely,



Bryant T. Champion  
Senior Vice-President,  
Environmental Affairs & Product Safety  
Georgia-Pacific LLC



Maureen Miller  
Corporate SHE Director  
Ingevity Corporation

cc: Dr. Robert E. Blanz, ADEQ (via e-mail: [blanz@adeq.state.ar.us](mailto:blanz@adeq.state.ar.us))  
Sarah Ross, GP (via e-mail)  
Duane Mummert, Ingevity (via e-mail)

Mr. Bryant T. Champion  
Senior Vice-President,  
Environmental Affairs & Product Safety  
Georgia-Pacific LLC  
133 Peachtree St. NE  
Atlanta, GA 30303

Ms. Maureen Miller  
Corporate SHE Director  
Ingevity Corporation  
5555 Virginia Avenue  
North Charleston, SC 29406

**RE: Georgia-Pacific Crossett LLC  
NPDES Permit No. AR0001210; AFIN: 02-00013**

Mr. Champion and Ms. Miller:

The Arkansas Department of Environmental Quality (“ADEQ”) has received your letter dated September 15, 2017 concerning the pending sale of Georgia-Pacific Chemicals LLC’s tall oil fractionation plant (the “TOFRAC Plant”) to Ingevity Arkansas, LLC (“Ingevity”). ADEQ understands that the closing date of the transaction is not known at this time, yet in anticipation of that closing date the parties seek written assurance from the Department that the Georgia-Pacific Crossett LLC’s (“GP”) current treatment of the TOFRAC Plant’s process wastewater and stormwater will be permitted to continue after the closing date pursuant to the terms and conditions of the above-referenced NPDES permit.

ADEQ hereby approves GP’s continued treatment of the TOFRAC Plant’s process wastewater and stormwater after completion of the planned divestiture of the TOFRAC Plant to Ingevity. As is the case today and will remain after completion of this divestiture, NPDES Permit No. AR0001210 will remain with GP. As such, GP will be responsible for treating the wastewater and stormwater generated by the TOFRAC Plant in compliance with the terms and conditions of the permit.



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**FIRST CLASS MAIL**

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