



Georgia-Pacific Consumer Operations LLC

Crossett Paper Operations  
100 Mill Supply Road  
P.O. Box 3333  
Crossett, AR 71635  
(870) 567-8000  
(870) 364-9076 (fax)  
www.gp.com

October 1, 2018

Caleb Osbourne  
Associate Director – Water Quality  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations  
AFIN 02-00013 NPDES Permit # AR0001210  
Request for Variance Extension – AR Code § 8-4-230

Dear Mr. Osborne:

On July 19, 2017, ADEQ granted Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations' (GP's) June 28, 2017 request for a Temporary Variance to conduct a trial operation to assess removing the Ash Settling Basins from service. The variance was granted for a period of 90 days. On October 6, 2017, January 5, 2018, April 2, 2018, and July 16, 2018 extensions to this request were granted. Pursuant to AR Code § 8-4-230, GP is requesting ADEQ grant a fourth extension to the variance so that it remains in effect until renewal of NPDES Permit No. AR0001210. This new process flow was outlined in the Supplementary NPDES Permit Application Information submitted to the agency on September 18, 2017. The trial appears to have been successful in reducing odors associated with hydrogen sulfide based on the TRC monitoring data from the West Crossett air monitor and employee observations of the wastewater treatment system.

Since the variance was issued on July 19, 2017, GP has created a conveyance near the basins to allow for the implementation of the trial. The omission of these basins from the treatment process has not impacted the mill's ability to comply with any of the NPDES permit limits to date, nor would this be expected in the future. There have been no significant changes observed in BOD or TSS loadings at Outfall 001. The mill is continuing to investigate additional sludge pressing capabilities and has installed a temporary belt press in an effort to improve primary clarifier efficiency. Dredging operations in Zone 1 of the Aerated Stabilization Basin (ASB) have ceased, and regular monitoring of solids accumulation is being conducted to ensure that it does not impact treatment efficiencies.

For the reasons above, Georgia-Pacific respectfully requests that ADEQ extend the variance until the pending renewal permit is finalized and in effect. We believe this variance is in the best interest of the community, protective of the environment and consistent with the pending renewal.

In accordance with ADEQ's July 19, 2017 letter, we are submitting this request for an extension three weeks prior to the October 22, 2018 expiration of the Temporary Variance, and appreciate ADEQ's prompt response to this request. Pursuant to AR Code § 8-4-230(a)(3), no additional fee is required for a request for extension.

Should you need any additional information, please contact Rachel Johnson at (870) 567-8170 or by email at [Rachel.JOHNSON2@GAPAC.com](mailto:Rachel.JOHNSON2@GAPAC.com).

Sincerely,

Michael L. Hohnadel  
Vice President – Manufacturing  
GP CO LLC - Crossett Paper Operations



00063  
00200

**FedEx**  
Express **Package**  
**US Airbill**

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**1 From**  
Date **10-1-18**

Sender's Name **REBECCA BLANKENSHIP** Phone **870 567-8812**

Company **GEORGIA PACIFIC/ENVIRONMENTAL**

Address **100 SUPPLY RD**

City **CROSSETT** State **AR** ZIP **71635**

**2 Your Internal Billing Reference**

**3 To**  
Recipient's Name **Caleb Osborn** Phone

Company **ARK D. of Environmental**

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Use this line for the HOLD location address or for continuation of your shipping address.

City **North Little Rock** State **AR** ZIP **72117**

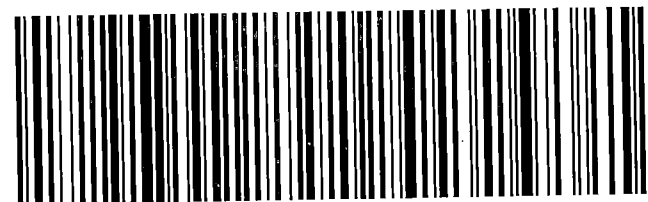


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**2 or 3 Business Days**

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**5 Packaging** \*Declared value limit \$500.

- ☒ **FedEx Envelope\*** ☐ **FedEx Pak\*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

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- ☐ **Indirect Signature**  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

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