



Georgia-Pacific Consumer Operations LL

Crossett Paper Operations
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March 5, 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
NPDES Permit # AR0001210
Request for Variance Extension – AR Code § 8-4-230

Dear Mr. Osborne:

On March 29, 2017, ADEQ granted Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations' (GP's) March 21, 2017 request for a Temporary Variance to discontinue the usage limits for hydrogen peroxide and the organic iron catalyst set forth in Part II. Paragraph 21 of NPDES Permit # AR0001210. The variance was granted for a period of 90 days and allows the unrestricted use of hydrogen peroxide and organic iron catalysts, AOTech CW and AOTech S, to control sulfides and other odorous compounds in the effluent streams and the wastewater treatment plant, and requires monthly sampling of Total Dissolved Iron. This variance was extended for an additional 90 days on June 21, 2017, September 20, 2017 and December 14, 2017. Prior to the issuance of the variance, the usage limits restricted the mill's ability to address odor associated with the facility's effluent and permitted wastewater treatment plant.

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 #AR0001210. As set forth in our original request for the variance, this is consistent with changes to the pending renewal of NPDES Permit # AR0001210, which ADEQ submitted to EPA for review on February 6, 2017. The Fact Sheet for the draft permit specifically addresses the removal of the usage limits as follows:

Request 6: In a letter dated March 1, 2016, the permittee requested that the chemical usage restrictions for Hydrogen Peroxide as well as the restrictions for the organic iron catalysts, AOTech CW and AOTech S, be removed from the permit. The purpose of the chemical usage is to control odor, not provide treatment of the wastewater. There are no adverse environmental impacts. To the contrary, the use of the chemicals has beneficially reduced odor in the community. The levels of BOD5 and color in the effluent have been reduced as well.

Response: Hydrogen Peroxide breaks down into water and oxygen, byproducts which will not harm the effluent or the water quality of the receiving stream. Therefore, the Hydrogen

Peroxide usage requirements will be removed from the permit. The purpose of the usage restrictions was to verify that the levels of Total Dissolved Iron are below that which would cause toxicity issues in the effluent. This purpose may also be achieved through the required WET testing and monitoring and reporting of the Total Dissolved Iron levels in the effluent at Outfall 001. Therefore, the usage restrictions for the organic iron catalysts have been replaced with a requirement to monitor and report the levels of Total Dissolved Iron in the effluent at Outfall 001.

Furthermore, this request to extend the variance continues to be consistent with the requirements set forth in AR Code § 8-4-230. In considering a request for a variance, the director shall consider:

- The environmental and public health effects of the temporary variance

As set forth above, the purpose of the hydrogen peroxide and iron catalyst addition is to address odors associated with the mill's effluent and permitted wastewater treatment system. By eliminating the usage limits, the mill will be in a better position to proactively anticipate and respond to conditions that could result in odors, providing a significant benefit to the surrounding community. Furthermore, consistent with the draft renewal permit, the mill currently conducts both WET testing and monthly monitoring of Total Dissolved Iron levels in the effluent at Outfall 001, and will continue to do so pending the permit renewal. The dissolved iron levels in the effluent in 2017 and 2018 have typically been less than 0.6 mg/L.

- Any economic advantage obtained by the party requesting the temporary variance over other similarly situated facilities . . .

Extending the variance will not result in any economic advantage to Georgia-Pacific. To the contrary, with the variance, Georgia-Pacific will incur added costs associated with the additional chemical usage.

- Whether strict compliance would result in the substantial curtailment or closing down of an existing or proposed business, plant or operation

While strict compliance would not result in curtailment of Georgia-Pacific's operations, it does restrict Georgia-Pacific's ability to address community concerns regarding odor associated with effluent and the wastewater treatment system. The ability to use these chemicals without usage limits during higher sulfide events will help reduce sulfide emissions and treatment system related odors. To date, the use of the advanced oxidation system has beneficially reduced odor in the community as well as provided other beneficial treatment impacts including increased BOD reduction and color reduction. Unrestricted use of the system is in the public interest and will continue to provide further benefits to the community.

Since it was issued on March 29, 2017 GP has utilized the flexibility provided by the variance. It is believed that this flexibility allowed us to to successfully reduce odor generated by the facility. For example, between April 29, 2017 and May 5, 2017, before and during the mill's annual outage, the hydrogen peroxide and iron catalyst usage rates were increased to offset the additional loading associated with outage tank cleaning activities. The efforts appear to have been successful based on our fence line monitoring data and employee observations of the wastewater treatment system. In June of 2017 a trial was run, in which chemical usage was increased under normal mill operating conditions to determine if a noticeable difference was observed in offsite impact. It was determined

that there was not a significant benefit to running higher chemical feed rates under normal conditions; however, GP would like to maintain this flexibility to address sulfide generation during variable operating conditions.

For the reasons set forth above, Georgia-Pacific respectfully requests that ADEQ extend the variance from the odor chemical usage limits specified in Part II. Paragraph 21 of the permit 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 December 14 letter, we are submitting this request for an extension three weeks prior to the March 26, 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. However, should you need any additional information, please contact Sarah Ross at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,



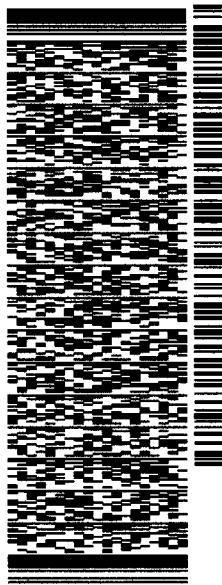
Michael L. Hohnadel
Vice President - Manufacturing
Crossett Paper Operations

ORIGIN: DELEDA (870) 567-8812
JACQUELINE MORGAN
GEORGIA PACIFIC
100 SUPPLY ROAD
DROP POINT 33
CROSSETT AR 71635
UNITED STATES US

SHIP DATE: 05MAR18
ACTWGT: 0.50 LB
CAD: 102787395/NET3880
BILL SENDER

TO CALEB OSBOURNE-WATER QUALITY
ADEQ
5301 NORTSHORE DR

NORTH LITTLE ROCK AR 72118
(501) 882-0998
REF: VARIANCE REQUEST EXT
PO. DEPT.



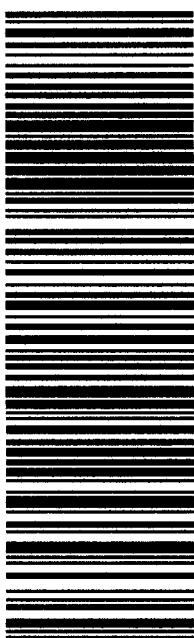
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