

# ADEQ

**A R K A N S A S**  
Department of Environmental Quality

March 29, 2017

Michael L. Hohnadel  
Vice-President of Manufacturing  
Georgia-Pacific Crossett LLC – Crossett Paper Operations  
P.O. Box 3333  
Crossett, AR 71635

Re: Request for Temporary Variance  
NPDES Permit Number AR0001210; AFIN 02-00013

Dear Mr. Hohnadel:

Pursuant to Ark Code Ann. § 8-4-230(a)(1)(A), the Arkansas Department of Environmental Quality grants the request dated March 21, 2017, for a Temporary Variance to discontinue the usage limits for Hydrogen Peroxide and the organic iron catalyst in the above mentioned NPDES permit. Please be aware the issuance of this Temporary Variance does not relieve your obligation to comply with the other terms and conditions of the current NPDES permit or any enforcement action ordered by the Department.

In the draft permit, currently under review by EPA Region VI, the Department has proposed removing the usage limits on Hydrogen Peroxide and replacing the usage limit on the organic iron catalyst with monitoring and reporting requirements for Total Dissolved Iron. Under this Temporary Variance, Georgia-Pacific Crossett LLC must monitor the levels of Total Dissolved Iron in the effluent discharged through Outfall 001 a minimum of once per month with a 24-hr composite sample. No requirements are necessary to allow for the removal of the Hydrogen Peroxide usage limits because this compound breaks down into oxygen and water.

As provided by Ark. Code Ann. § 8-4-230, this Temporary Variance is issued subject to the public's right to object to this decision within ten (10) business days of the public notice of the decision. After consideration of the written objections, the Director may within thirty (30) calendar days of the date of the initial decision, for compelling reasons or good cause shown, revoke or modify the conditions of the temporary variance. The Director's revocation or modification of her initial decision becomes a final decision for purposes of appeal. Upon issuance, notice of the final decision shall be sent to the applicant and those persons who submitted timely objections. If the Director's initial decision is not revoked or modified within thirty (30) calendar days of the date of the decision, the decision is deemed final for purposes of appeal.

The Department has prepared the enclosed public notice and will arrange for the publication of this document. An invoice for the cost of publishing the public notice and proof of publication

will be sent to you by the advertising newspaper. The permittee must send proof of publication and payment as soon as possible but no later than 30 days from the above date to

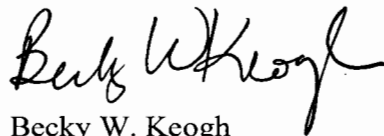
Arkansas Department of Environmental Quality,  
ATTN: Permits Branch – Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317.

Any actions taken by Georgia-Pacific Crossett LLC in reliance upon this Temporary Variance are strictly at the permittee's own risk. No actions or expenditures by Georgia-Pacific Crossett LLC during this period shall be construed as accruing equities in Georgia-Pacific Crossett LLC's favor. Also, please note that the term of this Temporary Variance may not exceed ninety (90) days pursuant to Ark. Code Ann. § 8-4-230(a)(2). The department may grant a request for an extension of a temporary variance prior to the expiration date. Therefore, Georgia-Pacific Crossett LLC must request in writing an extension of this Temporary Variance before that date, unless the Department has issued an NPDES permit to Georgia-Pacific Crossett LLC without the limits for Hydrogen Peroxide and the organic iron catalyst.

In order to facilitate the review process, Georgia-Pacific Crossett LLC should submit the request three (3) weeks prior to the Temporary Variance expiration date with proof that any delays resulted from circumstances beyond the facility control. Should Georgia-Pacific Crossett LLC allow this Temporary Variance to expire or fail to submit a request for an extension in a timely manner prior to permit issuance, the facility could be subject to an enforcement action by the Department.

If you have any questions, please contact Michael McAlister at (501) 682-0884 or Loretta Reiber, P.E. at (501) 682-0612.

Sincerely,



Becky W. Keogh  
Director

Enclosure

NOTICE OF TEMPORARY VARIANCE

Georgia-Pacific Crossett LLC  
Permit Number AR0001210 – AFIN 02-00013

Notice is hereby given, pursuant to Ark Code Ann. Section 8-4-230(a)(1)(B), that the Director of the Arkansas Department of Environmental Quality (ADEQ), 5301 Northshore Drive, North Little Rock, AR 72118-5317, phone number (501) 682-0618, has granted a Temporary Variance to Georgia-Pacific Crossett LLC, 100 Mill Supply Road, Crossett, AR 71635. The facility is hereby authorized to discontinue tracking usage of Hydrogen Peroxide and to replace the organic iron catalyst usage limit with monitoring and reporting for Total Dissolved Iron, prior to the issuance of the renewal permit.

This decision is subject to and contingent upon the right of the public to object to the Director's decision. Any member of the public may object to the Director's decision or request a public hearing within ten (10) business days of the date of this notice. Objections or requests for a public hearing will be accepted if submitted no later than 4:30 pm on the last day of the comment period. Written objections or a request for a public hearing should be sent to: Arkansas Department of Environmental Quality, ATTN: Legal Division, 5301 Northshore Drive, North Little Rock, AR 72118-5317 or by fax at 501-682-0910, or by e-mail at: [mcalister@adeq.state.ar.us](mailto:mcalister@adeq.state.ar.us).

After consideration of any timely written objections, the Director may revoke or modify the conditions of this Temporary Variance within thirty (30) calendar days of the date of this decision for compelling reasons or good cause shown. The Director's revocation or modification of her prior decision becomes a final decision for purposes of appeal. Upon issuance of the final decision, notice of the final decision will be sent to the applicant and those persons who submitted timely objections. If the Director's initial decision is not revoked or modified within thirty (30) calendar days of the date of the decision, the decision is deemed final for purposes of appeal.

Documents concerning this matter are available for viewing/copying at ADEQ's offices, 5301 Northshore Drive, North Little Rock, AR 72118 between the hours of 8:00 a.m. and 4:30 p.m.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2017

Becky Keogh, Director  
ADEQ