



Georgia-Pacific Consumer Operations LLC
Consumer Products

Crossett Paper Operations
100 Mill Supply Road
P.O. Box 3333
Crossett, AR 71635
(870) 567-8000
(870) 364-9076 (fax)
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May 19, 2021

Bryan Leamons, P.E.
Senior Operations Manager
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES Permit No. **AR0001210, AFIN 02-00013**
Georgia-Pacific Consumer Operations LLC: Crossett Paper Operations
pH Adjustment Trial Extension Request

Dear Mr. Leamons:

Following up our discussions on May 6, 2021, May 12, 2021 and May 13, 2021, Georgia Pacific Consumer Operations - Crossett Paper Operations (GP) would like to request a Trial extension. Following the 2019 shutdown of our pulping process, pH adjustment of the effluent became necessary due to the resulting algal blooms. As the weather gets warmer, the conditions for algal bloom become more frequent and GP would like to evaluate and optimize a rental bulk tank delivery system for carbon dioxide (CO₂) upstream of Outfall 001 and to continue monitoring SMS 002 out of flood conditions. A flooded state is defined as the period when the gauge at the Felsenthal Lock and Dam exceeds 62 feet and also for the two weeks following the recession of flood waters below 62 feet.

As required by ADEQ's October 25, 2019 letter, the pH monitoring frequency increased to a minimum of five per week after the Trial commenced. The Outfall 001 and SMS 002 pH data is available in Appendix 1.

GP is submitting this pH Adjustment Trial extension request to continue CO₂ injection from cylinders and/or a bulk tank delivery system until the NPDES Construction Permit application is processed.

If you have any questions regarding this response, please contact Rachel Johnson, Environmental Engineer, at (870) 415-6352 or by email at Rachel.Johnson2@gapac.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Tommy D. Smith
Vice President of Manufacturing

5-19-2021

DATE

Appendix 1 pH Data

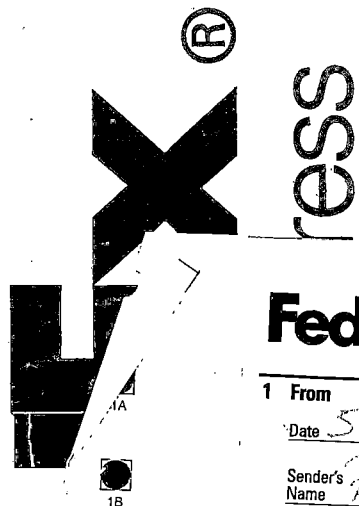
Date	Outfall 001 pH	SMS 002 pH	Date	Outfall 001 pH	SMS 002 pH	Date	Outfall 001 pH	SMS 002 pH	Date	Outfall 001 pH	SMS 002 pH
5/1/2020		Flooded	6/1/2020	7.1	Flooded	7/1/2020	6.8	Flooded	8/1/2020		
5/2/2020			6/2/2020	7.2		7/2/2020	6.8		8/2/2020	7.7	7.7
5/3/2020	7.0		6/3/2020	7.2		7/3/2020			8/3/2020	7.3	7.8
5/4/2020	6.9		6/4/2020	7.2		7/4/2020			8/4/2020	7.3	7.8
5/5/2020	6.9		6/5/2020			7/5/2020	6.9		8/5/2020	7.3	7.9
5/6/2020	6.9		6/6/2020			7/6/2020	6.9		8/6/2020	7.4	7.3
5/7/2020	6.9		6/7/2020	7.9		7/7/2020	6.9		8/7/2020		
5/8/2020			6/8/2020	7.7		7/8/2020	7.0		8/8/2020		
5/9/2020			6/9/2020	7.6		7/9/2020	6.9		8/9/2020	7.7	7.7
5/10/2020	6.7		6/10/2020	7.6		7/10/2020			8/10/2020	7.7	7.8
5/11/2020	6.8		6/11/2020	7.5		7/11/2020			8/11/2020	7.7	7.7
5/12/2020	6.9		6/12/2020			7/12/2020	6.9		8/12/2020	8.0	7.5
5/13/2020	7.0		6/13/2020			7/13/2020	6.8		8/13/2020	7.7	7.4
5/14/2020	7.0		6/14/2020	7.3		7/14/2020	6.9		8/14/2020		
5/15/2020			6/15/2020	7.2		7/15/2020	7.2		8/15/2020		
5/16/2020			6/16/2020	7.0		7/16/2020	7.4		8/16/2020	7.5	7.9
5/17/2020	7.0		6/17/2020	7.0		7/17/2020			8/17/2020	7.6	7.2
5/18/2020	6.9		6/18/2020	8.2		7/18/2020			8/18/2020	7.6	7.9
5/19/2020	6.9		6/19/2020			7/19/2020	7.4		8/19/2020	7.5	7.5
5/20/2020	7.2		6/20/2020			7/20/2020	7.5		8/20/2020	7.5	7.5
5/21/2020	7.4		6/21/2020	7.5		7/21/2020	7.5		8/21/2020		
5/22/2020			6/22/2020	7.6		7/22/2020	7.4		8/22/2020		
5/23/2020			6/23/2020	7.6		7/23/2020	7.6		8/23/2020	7.7	7.3
5/24/2020	7.2		6/24/2020	7.6		7/24/2020			8/24/2020	7.7	7.2
5/25/2020	7.4		6/25/2020	7.1		7/25/2020			8/25/2020	7.7	7.7
5/26/2020	7.6		6/26/2020			7/26/2020	7.4		8/26/2020	7.7	7.5
5/27/2020	7.7		6/27/2020			7/27/2020	7.5		8/27/2020	7.5	7.7
5/28/2020	7.5		6/28/2020	6.8		7/28/2020	7.6		8/28/2020		
5/29/2020			6/29/2020	7.1		7/29/2020	7.4		8/29/2020		
5/30/2020			6/30/2020	6.7		7/30/2020	7.4		8/30/2020	7.6	6.7
5/31/2020	6.6					7/31/2020			8/31/2020	7.7	6.7

Appendix 1 pH Data

Outfall 001 SMS 002			Outfall 001 SMS 002			Outfall 001 SMS 002			Outfall 001 SMS 002		
Date	pH	pH	Date	pH	pH	Date	pH	pH	Date	pH	pH
9/1/2020	7.6	6.8	10/1/2020	7.4	Flooded	11/1/2020	7.6	7.6	12/1/2020	7.4	7.5
9/2/2020	7.5	6.7	10/2/2020			11/2/2020	8.7	8.0	12/2/2020	7.4	7.4
9/3/2020	7.7	Flooded	10/3/2020			11/3/2020	7.9	8.3	12/3/2020	7.3	7.3
9/4/2020			10/4/2020	7.4		11/4/2020	7.6	7.8	12/4/2020		
9/5/2020			10/5/2020	7.4		11/5/2020	7.6	7.8	12/5/2020		
9/6/2020	7.6		10/6/2020	7.1		11/6/2020			12/6/2020	7.4	7.3
9/7/2020	7.5		10/7/2020	7.3		11/7/2020			12/7/2020	7.4	7.3
9/8/2020	7.5		10/8/2020	7.4		11/8/2020	7.7	7.8	12/8/2020	7.4	7.3
9/9/2020	7.5		10/9/2020			11/9/2020	7.5	7.7	12/9/2020	7.4	7.4
9/10/2020	7.4		10/10/2020			11/10/2020	7.3	7.1	12/10/2020	7.3	7.3
9/11/2020			10/11/2020	7.2		11/11/2020	7.2	7.2	12/11/2020		
9/12/2020			10/12/2020	7.1		11/12/2020	7.2	7.2	12/12/2020		
9/13/2020	7.4		10/13/2020	7.0		11/13/2020			12/13/2020	8.2	7.2
9/14/2020	7.5		10/14/2020	7.0		11/14/2020			12/14/2020	7.4	6.9
9/15/2020	7.5		10/15/2020	7.1		11/15/2020	7.3	7.5	12/15/2020	7.4	7.0
9/16/2020	7.5		10/16/2020			11/16/2020	7.3	7.2	12/16/2020	7.5	7.1
9/17/2020	7.5		10/17/2020			11/17/2020	7.3	7.6	12/17/2020	7.2	7.0
9/18/2020			10/18/2020	7.1		11/18/2020	7.3	7.5	12/18/2020		
9/19/2020			10/19/2020	7.1		11/19/2020	7.2	7.6	12/19/2020		
9/20/2020	7.5		10/20/2020	7.2		11/20/2020			12/20/2020	7.1	6.9
9/21/2020	7.5		10/21/2020	7.1		11/21/2020			12/21/2020	7.1	6.5
9/22/2020	7.5		10/22/2020	7.1		11/22/2020	6.7	7.6	12/22/2020	7.1	6.9
9/23/2020	7.5		10/23/2020			11/23/2020	7.3	7.1	12/23/2020	7.1	Flooded
9/24/2020	7.5		10/24/2020			11/24/2020	7.3	7.6	12/24/2020	7.1	
9/25/2020			10/25/2020	7.1		11/25/2020	7.3	7.7	12/25/2020		
9/26/2020			10/26/2020	7.2		11/26/2020	7.3	7.5	12/26/2020		
9/27/2020	7.4		10/27/2020	7.1		11/27/2020			12/27/2020	7.1	
9/28/2020	7.4		10/28/2020	7.1		11/28/2020			12/28/2020	7.1	
9/29/2020	7.4		10/29/2020	8.3		11/29/2020	7.4	7.3	12/29/2020	7.1	
9/30/2020	7.4		10/30/2020			11/30/2020	7.4	7.3	12/30/2020	7.2	
			10/31/2020						12/31/2020	7.2	

Appendix 1 pH Data

Outfall 001	SMS 002	Outfall 001	SMS 002	Outfall 001	SMS 002	Outfall 001	SMS 002
Date	pH	Date	pH	Date	pH	Date	pH
1/1/2021		2/1/2021	7.5	3/1/2021	7.0	4/1/2021	6.9
1/2/2021		2/2/2021	7.6	3/2/2021	6.9	4/2/2021	
1/3/2021	7.1	2/3/2021	7.5	3/3/2021	7.2	4/3/2021	
1/4/2021	7.1	2/4/2021	7.4	3/4/2021	7.2	4/4/2021	7.3
1/5/2021	7.0	2/5/2021		3/5/2021		4/5/2021	7.6
1/6/2021	7.1	2/6/2021		3/6/2021		4/6/2021	7.6
1/7/2021	7.1	2/7/2021	7.4	3/7/2021	7.2	4/7/2021	7.4
1/8/2021		2/8/2021	7.4	3/8/2021	7.1	4/8/2021	7.0
1/9/2021		2/9/2021	7.3	3/9/2021	7.2	4/9/2021	
1/10/2021	7.5	2/10/2021	7.4	3/10/2021	7.1	4/10/2021	
1/11/2021	7.5	2/11/2021	7.3	3/11/2021	7.1	4/11/2021	7.0
1/12/2021	7.9	2/12/2021		3/12/2021		4/12/2021	7.2
1/13/2021	7.6	2/13/2021		3/13/2021		4/13/2021	7.4
1/14/2021	7.8	2/14/2021	7.6	3/14/2021	6.9	4/14/2021	7.1
1/15/2021		2/15/2021	7.5	3/15/2021	6.9	4/15/2021	7.0
1/16/2021		2/16/2021	7.2	3/16/2021	6.9	4/16/2021	
1/17/2021	7.8	2/17/2021	7.7	3/17/2021	6.9	4/17/2021	
1/18/2021	7.8	2/18/2021	7.4	3/18/2021	6.8	4/18/2021	6.9
1/19/2021	7.7	2/19/2021		3/19/2021		4/19/2021	7.2
1/20/2021	7.4	2/20/2021		3/20/2021		4/20/2021	7.2
1/21/2021	7.4	2/21/2021	7.4	3/21/2021	6.9	4/21/2021	7.3
1/22/2021		2/22/2021	7.4	3/22/2021	6.9	4/22/2021	6.7
1/23/2021		2/23/2021	7.3	3/23/2021	6.9	4/23/2021	
1/24/2021	7.5	2/24/2021	7.4	3/24/2021	6.9	4/24/2021	
1/25/2021	7.3	2/25/2021	7.3	3/25/2021	6.9	4/25/2021	7.7
1/26/2021	7.4	2/26/2021		3/26/2021		4/26/2021	7.8
1/27/2021	7.4	2/27/2021		3/27/2021		4/27/2021	7.2
1/28/2021	7.6	2/28/2021	7.1	3/28/2021	7.0	4/28/2021	7.3
1/29/2021				3/29/2021	7.1	4/29/2021	7.7
1/30/2021				3/30/2021	7.0	4/30/2021	
1/31/2021	7.5			3/31/2021	6.9		



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Phone

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Company

Georgia Pacific Consumer GPs, LLC

Address

100 Mill Supply Road

City

Crosscut

State

AR

ZIP

71635

2 Your Internal Billing Reference

3 To

Recipient's
Name

Bryan Longans

Phone

Company

ADEQ Office of Water Quality

Address

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Dept./Floor/Suite/Room

Address

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State

AR

ZIP

72118



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05:21
177
FZ
25 9662 1022

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