



Georgia-Pacific LLC
Consumer Products

Crossett Paper Operations
100 Mill Supply Rd.
P.O. Box 3333
Crossett, AR 71635
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December 5, 2011

Mr. Mo Shafii,
Assistant Chief, Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Subject: Georgia-Pacific Crossett Paper Operations
NPDES Permit No. AR0001210
AFIN 02-00013

Dear Mr. Shafii,

Georgia-Pacific LLC contacted your office on October 13, 2011, requesting permission to expand the surge basin by approximately 20 acres. This expansion was necessary to provide added wastewater storage due to unusually low flow conditions in the Ouachita River downstream of Felsenthal Lock and Dam after river flow curtailment by the Corps of Engineers. We began work immediately after receiving the verbal authorization to proceed by incorporating construction of this basin into the existing Stormwater Construction Permit associated with Project Diamond. Construction of the 20-acre surge basin expansion took approximately three weeks to complete.

We concluded the work on October 31, 2011, and then we received a letter from your office requiring us to meet applicable provisions of the Ten State Standards and conditions of the general construction permit (ARR150000). GP met all the specified requirements but one (the pond bottom permeability) and would like to request the use of alternative permeability specifications.

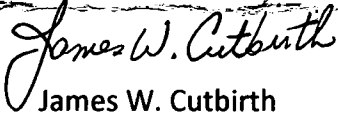
By using the natural soils available to us in the immediate vicinity of the surge basin site, we were able to consistently achieve a minimum 1×10^{-6} centimeter per second (cm/sec) permeability across the bottom of the expanded surge basin. Several measurements were greater than 1×10^{-9} cm/sec; however, we cannot achieve a minimum of 1×10^{-7} cm/sec permeability across the entire expanded surge basin using the soils immediately available to us. We investigated the availability of additional soils at a number of sites within a reasonable traveling distance (less than 10 miles). Those soils have not been able to meet the 10^{-7} cm/sec permeability requirement. We did locate a distant site in Lacy, Arkansas with soils that could

meet the 10^{-7} cm/sec permeability requirement, but it is 32 miles from the Crossett mill. Due to the distance involved, the cost to transport this material alone will exceed \$500,000.

We are requesting that the basin permeability requirements be changed such that all single point measurements meet a minimum value of 1×10^{-6} centimeter per second. The permeability of this new section of the surge basin will exceed that of the original surge basin installed in the mid-1990's. This portion of the surge basin will be rarely used except in unusual conditions that necessitate storage of wastewater and stormwater.

We appreciate the ADEQ's assistance in working through this difficult period of low river flow. Please contact me with any questions at 870-567-8144.

Respectfully yours,



James W. Cutbirth
Manager of Environmental Services
Georgia-Pacific Consumer Products

SUMMARY OF LABORATORY TEST RESULTS

PROJECT: Georgia Pacific Surge Pond
 LOCATION: Crossett, AR
 GHBW JOB No.: 11-5293

Proctor 10/14C		Proctor 10/14E		Proctor 10/14F	
Max density, pcf	Optimum water content, %	Max density, pcf	Optimum water content, %	Max density, pcf	Optimum water content, %
111.2	15.9	109.5	16.3	113.1	14.6

STANDARD PROCTOR (ASTM D698):

Samples obtained on site 2 Nov 11 and 6 Nov 11

SAMPLE NO.	ATTERBERG LIMITS (ASTM D4318)			SIEVE ANALYSIS (ASTM D422)							TESTED UNIT DRY WT, pcf	TESTED WATER CONTENT, %	Percent maximum density, %	Water content WRT optimum, %	COEFF of PERMEABILITY (k), cm/sec	UNIFIED CLASS. (ASTM D2487)	AASHTO CLASS. (M145)	DESCRIPTION	COMMENTS
	LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	PERCENT PASSING															
				1 in.	3/4 in.	3/8 in.	#4	#10	#40	#200									
11/02C	38	14	24	100	100	99	99	98	98	64	112.1	17.3	102%	1.0	8.2E-09	CL	A-6	Reddish brown fine sandy CLAY w/ clay pockets	recovered 4 in. sandy clay, silty fine sand in remainder of sample
11/02D	29	14	15	100	100	100	100	99	99	63	106.0	16.9	97%	0.6	7.3E-09	CL	A-6	Gray & reddish brown fine sandy CLAY	recovered 6 in. sandy clay, silty fine sand in remainder of sample
11/06A	31	15	16	100	100	100	100	100	97	30	108.3	11.7	96%	-2.9	5.2E-06	SC	A-2-4	Tan, gray & red clayey fine SAND	8+ in. clayey sand recovery
11/06B	31	15	16	100	100	100	100	100	99	37	105.9	15.4	94%	0.8	3.5E-06	SC	A-2-4	Tan & reddish brown clayey fine SAND	8+ in. clayey sand recovery; re-test at location of S11/02A
11/06C	22	12	10	100	100	100	100	100	97	35	112.7	12.6	100%	-2.0	1.1E-06	SC	A-2-4	Gray, tan & brown clayey fine SAND	6 in. clayey sand recovery, silty fine sand at bottom
11/06D	33	13	20	100	100	100	100	100	99	72	116.0	14.4	106%	-1.9	8.2E-08	CL	A-6	Gray, brownish gray & reddish tan fine sandy CLAY w/ clay pockets	8+ in. sandy clay recovery

Average 1.7E-06

ADEQ

ARKANSAS
Department of Environmental Quality

October 31, 2011

James W. Cutbirth
Manager of Environmental Services
Georgia-Pacific, LLC – Crossett Paper Operations
P.O. Box 3333
Crossett, AR 71635

RECEIVED
11-7-11
BB

RE: NPDES Permit No. AR0001210, AFIN 02-00013
Surge Pond Expansion

Dear Mr. Cutbirth:

The Department has reviewed your correspondence dated October 13, 2011, requesting permission to expand the surge basin (referred to as the equalization basin in the Fact Sheet for NPDES Permit No. AR0001210) by 20 acres so that it will hold an additional 71 million gallons of wastewater. It is the Department's understanding that the additional storage is needed because discharges to the Ouachita River have been curtailed due to the low flow conditions below Felsenthal Lock and Dam. The discharges have been curtailed so that the water quality of the Ouachita River is maintained.

The surge basin is located downstream of the two ash basins and upstream of the aeration basin including the location where the wastewater from the City of Crossett enters Georgia-Pacific's wastewater treatment plant. The surge basin is not used to treat the wastewater, but rather to control the flow of wastewater into the aeration basin. The work to be performed at the surge basin is considered to be for maintenance purposes. Therefore, the need for a construction permit is waived as allowed under Reg. 6.202(B).

Please note that although a construction permit is not required, the following requirements must be met:

1. All applicable provisions of the Ten State Standards must be met including but not limited to the following:
 - a. The slopes on the new portion of the surge basin must not be steeper than 1 vertical to 3 horizontal or flatter than 1 vertical to 4 horizontal as set forth in Section 93.4 of the Ten State Standards.
 - b. The permeability of the pond bottom must be a minimum of 1×10^{-7} cm/sec.
 - c. The dike width must be at least 8 feet to permit access for maintenance vehicles as set forth in Section 93.4 of the Ten State Standards.
2. The requirements of the general permit for stormwater runoff associated with construction activity (ARR150000) must be met.

If you have any questions, please contact Loretta Reiber, P.E. of the Individual Discharge Permits Section at reiber@adeq.state.ar.us or at (501) 682-0612.

Sincerely,



Mo Shafii
Assistant Chief, Water Division

MS:lr

cc: Eric Fleming, Field Services Branch Manager
Jason Bolenbaugh, Enforcement Analyst



Products
Supply Road
333
Arkansas 71635


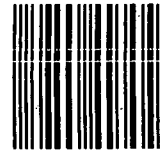


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