



Georgia-Pacific Consumer Operations LLC

Crossett Paper Operations
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(870) 364-9076 (fax)
www.gp.com

March 22, 2018

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

RECEIVED

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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 and January 5, 2018, extensions to this request were granted. Pursuant to AR Code § 8-4-230, GP is requesting ADEQ grant a third 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 April 15, 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.

Sincerely,

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

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