



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)
www.gp.com

July 11, 2018

Robert E. Blanz, Chief Technical Officer
Office of the Director
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 No. AR0001210 AFIN 02-00013
Extension Request to Continue Studying the Impacts of Adding Oxygen to the
Wastewater Treatment System

Dear Mr. Blanz:

To follow-up our discussion from Friday, June 29, 2018, Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations (GP) requests to extend the trial of applying oxygen to the wastewater treatment system as described in the July 27, 2017 letter from ADEQ.

GP presently applies hydrogen peroxide and an organic iron catalyst immediately upstream of the primary clarifier to oxidize sulfide in the wastewater. This reduces the potential for emissions of hydrogen sulfide from the primary clarifier. Additionally, since hydrogen peroxide decomposes into water and oxygen, this also provides an added boost of oxygen to the wastewater. Oxygen also rapidly oxidizes sulfide. Adding oxygen through this means and by aeration in the aeration basin is already part of our process and is also necessary for proper degradation of organics.

During this trial continuation, we would inject oxygen (from either an oxygen generator system or liquid oxygen supply tank) in the primary clarifier and downstream at a second oxygen injection point in the conveyance between the Primary Clarifier Effluent and Aeration Stabilization Basin (ASB) after the City of Crossett's influent is introduced.

There are several benefits of adding oxygen in this manner: (1) it reduces the potential for odors, (2) it increases the settling efficiency significantly of the primary clarifier by raising the oxidation-reduction potential in the settling zone, (3) the dewatering characteristics are much improved since the settled sludge is more aerobic and (4) it meets immediate oxygen demands of some readily degraded substances. Additionally, the use of oxygen may reduce or eliminate the use of hydrogen peroxide at this clarifier, thereby significantly reducing chemical costs and reducing safety risks from handling 50% hydrogen peroxide.

Our extension request would be to run this trial for an additional 12 months. We would begin this dual addition point trial as soon as we procure and install the equipment. During the trial period, if we determined that we would like to make the oxygen system a permanent installation, we will contact you to determine next steps.

If you have any questions or need additional information prior to this, please feel free to contact me at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,

A handwritten signature in black ink that reads "Sarah M. Ross". The signature is written in a cursive, flowing style.

Sarah M. Ross
Manager – Environmental Mill Services
Crossett Paper Operations

CC: Loretta Reiber, P.E. via email

ORIGIN ID:ELDA (870) 567-8670
 SARAH ROSS
 GEORGIA PACIFIC LLC-CROSSETT PAPER
 100 MILL SUPPLY ROAD
 DROP POINT 33
 CROSSETT, AR 71635
 UNITED STATES US

SHIP DATE: 11 JUL 18
 ACTWGT: 1.00 LB
 CAD: 102787395/INET3980

BILL SENDER

TO **WATER DIVISION**
ADEQ
5301 NORTSHORE DR
ATTN ROBERT BLANZ
NORTH LITTLE ROCK AR 72118

552.2/8532/DC/AS

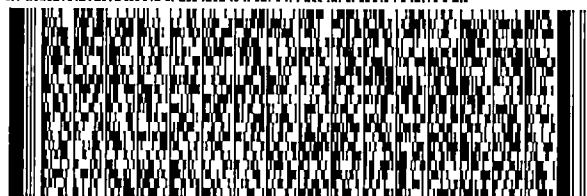
(501) 682-0588

REF: OXYGEN EXTENSION REQUEST

INV:

PO:

DEPT:



TRK#
0201

7726 8572 9745

THU - 12 JUL 3:00P
 STANDARD OVERNIGHT

X2 LITA

72118
 AR-US LIT



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number. Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.