



ARKANSAS

ENERGY & ENVIRONMENT

May 11, 2022

Tommy D. Smith
Vice-President – Manufacturing
Georgia-Pacific Crossett LLC
P.O. Box 3333
Crossett, AR 71635

RE: NPDES Permit No. AR0001210, AFIN 02-00013
Sale of Resins Plant to Bakelite

Dear Mr. Smith:

The Office of Water Quality (OWQ) has reviewed your correspondence dated February 8, 2022, concerning the sale of Georgia-Pacific Chemicals LLC resins manufacturing facility (Resins Plant) to Bakelite. Based on your correspondence, it is the OWQ's understanding that Georgia-Pacific Crossett LLC (GP) will continue to treat the process wastewater and stormwater generated by the Resins Plant once the sale is completed. It is also the OWQ's understanding that GP and Bakelite have agreed to several internal controls to assist GP in maintaining compliance with the NPDES permit.

Based on the understanding outlined in the preceding paragraph, the OWQ has no objections to GP continuing to treat the Resins Plant effluent once the sale has been completed. Please note that updates to EPA Form 2C of the renewal application, including any planned changes in production levels, must be made as soon as possible.

In anticipation of the completed transaction, ADEQ will amend the pending permit renewal to include a condition that the parties establish and maintain a written agreement providing for the continued treatment of the Resins Plant's process wastewater and stormwater by GP. This agreement shall require that GP's treatment of the Resins Plant's process wastewater and stormwater comply with the terms and conditions of applicable permits, including NPDES Permit No. AR0001210. Such agreement shall be submitted to ADEQ once the transaction is final.

During the period the permit renewal is pending, this letter will serve as authorization for GP to continue treatment of the Resins Plant's process wastewater and stormwater after completion of the planned divestiture of the GP's Resins Plant to Bakelite.

If you have any questions, please contact Loretta Carstens, P.E. of the NPDES Permits Section at loretta.carstens@adeq.state.ar.us or at (501) 682-0612.

Sincerely,



Alan J. York
Associate Director
Office of Water Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR, 72118

cc: Sarah Ross, Georgia-Pacific Crossett LLC (sarah.ross@gapac.com)