



Georgia-Pacific Crossett LLC
Consumer Products

[Crossett Paper Operations](#)
[100 Mill Supply Road](#)
[P.O. Box 3333](#)
[Crossett, AR 71635](#)
[\(870\) 415-6257](#)

October 6, 2023

Loretta Carstens
Permit Engineer
Office of Water Quality
Arkansas Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Crossett LLC: Crossett Paper Operations
NPDES Permit # **AR0001210, AFIN 02-00013**

Dear Ms. Carstens:

Please accept this letter in response to your email dated September 15, 2023. We have addressed each of your requests as outlined below:

Question #1: Updated certification that no chlorophenolic-containing biocides are being used at the facility.

Response #1: A review of biocides currently in use at the facility has been conducted to verify there are no chlorophenolic-containing products at Georgia-Pacific Crossett LLC. A certification statement has been attached to this submission.

Question #2: Updated breakdown of average flows at GP Crossett. This should separate out the stormwater, sanitary sewer, and process flows. This information is needed in order to be able to calculate the ELG based portion of the permit limits.

Response to #2: Approximate average flows are as follow:

- Average Annualized Stormwater flows – 1.4 MGD
- Process flows from Georgia-Pacific Crossett LLC – 6.8 MGD
- Process flows from Ingevity Arkansas LLC – 0.4 MGD
- Process flows from Bakelite Chemicals LLC – 0.2 MGD
- Sanitary sewer flows from onsite septic systems – 0.1 MGD
- Flows from the City of Crossett – 1.0 MGD

October 6, 2023

Question #3: Breakdown of what chemical processes at Bakelite are subject to which subpart of 40 CFR 414. With how I classified them, I couldn't see what would be subject to Subpart H as listed in the EPA form.

Response to #3: Bakelite primarily manufactures Thermosetting Resins (SIC Code 2821) including Urea Formaldehyde (UF) Resin, Phenol Formaldehyde (PF) Resin, Urea Formaldehyde Concentrate (UFC), Spray Dried Resins (UF & PF) which is potentially subject to the wastewater pretreatment standards in 40 CFR 414, Subpart E. The facility also manufactures Wet Strength Resins (WSR) which is considered a polyamide resin which appears to align with Subpart E as well.

Subpart H applies to Specialty Organic Chemicals under SIC Code 2869. This SIC code and subpart may have previously been applicable to the Tall Oil Fractionation (TOFRAC) process and Specialty Reactors (C-1) and (R-1) which are now owned by Ingevity.

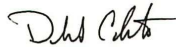
Upon further review and discussions with Bakelite, we also believe that Subpart F may have been listed in the past because of the ICI Formaldehyde Manufacturing Process. Because this process was shut down in September 2012 and has been removed from the Title V Air Permit, Subpart F does not seem to apply to the current NPDES Permit application.

Question #4: Updated cooling water intake certification. I think the last one was submitted in May 2020.

Response to #4: A review of the current water usage from GP's surface water intake indicates that approximately 4% is used for once through cooling water. Please see the attached Cooling Water Intake Certification.

If you have any questions regarding this submittal, please feel free to contact Sarah Ross at (870) 415-6363 or sarah.ross@gapac.com or Rachel Johnson at (870) 415-6352 or rachel.johnson2@gapac.com.

Sincerely,



Deborah Coduto
Vice-President of Manufacturing

Biocide Certification

In accordance with the requirements of 40 CFR 430.24(d), I hereby certify that the Georgia-Pacific Crossett LLC facility, Crossett Paper Operations, does not utilize trichlorophenolic-containing or pentachlorophenolic-containing biocides in our process operations.

DLH Cato
Signature

10/5/2023
Date

VP-MANUFACTURING
Title of Responsible Corporate Official

Cooling Water Intake Certification

In accordance with the requirements of Section 316(b) of the Clean Water Act, I hereby certify that less than 10% of the total surface water used at the Georgia-Pacific Crossett LLC facility, Crossett Paper Operations, is used as once through cooling water.

DW Crossett
Signature

10/05/2023
Date

VP - MANUFACTURING
Title of Responsible Corporate Official