



Georgia-Pacific LLC  
Consumer Products

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February 12, 2015

Ms. Loretta Reiber, P.E.  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Subject: NPDES Permit No. AR0001210, AFIN 02-00013  
Results of Chemical Addition Trials at the Wastewater Treatment System

Dear Ms. Reiber:

In accordance with your approval letter dated July 31, 2014, here are the required results for the addition of certain chemicals to the wastewater treatment system for the purpose of improving effluent quality as well as potentially reducing odors. As you requested in your approval, we have listed your requirements and included our response below each requirement.

1. **Notification of the start of each trial must be submitted to the Department two business days prior to starting**

The iron addition was begun on the following dates:

- Ferric sulfate in third cell of aeration basin on 8/19/2014
- Ferrous chloride upstream of ash basins on 10/1/2014

We provided notification to you of the Start of both of these trials on 8/12/2014.

2. **The effluent from Outfall 001 must be sampled for Dissolved Iron and Total Iron a minimum of once per week beginning when the first trial starts and ending when the second trial is over. These results must be submitted to Loretta Reiber, P.E., of the Individual Discharge Permits Section with the results of the trials;**

The monitoring results for dissolved iron and total iron are attached. We have concluded the trial of the ferric sulfate addition in the aeration basin. The iron addition at the third cell of the aeration basin was designed to bind dissolved orthophosphate so as to minimize possible algal blooms in Mossy Lake. Based on our observations of Mossy Lake during this time, it appears the trial was successful. We will likely include this addition option in our renewal permit application due in May 2015.

The addition of the ferrous chloride upstream of the ash basins is designed to bind free sulfide in solution. We have continued to monitor ambient air hydrogen sulfide emissions around the wastewater treatment systems and they have been low. This has aided in the reduction of odor around the wastewater treatment system. We believe this trial was successful and would like to continue its operation. Please consider this a request to continue its operation. We'd proposed to monitor total iron at outfall 001 monthly during its continued operation.

Sincerely,



Sarah M. Ross  
Environmental Manager  
Crossett Paper Operations

Date	Flow	Total Iron Conc. (ug/L)	Total Iron Loading (lb/day)	Dissolved Iron Conc. (ug/L)	Dissolved Iron Loading (lb/day)
8/13/2014	39.0	440	143.1	360	117.1
8/20/2014	35.4	790	233.2	700	206.7
8/26/2014	30.8	660	169.5	600	154.1
9/3/2014	42.3	790	278.7	760	268.1
9/9/2014	49.6	1400	579.1	1100	455.0
9/16/2014	40.7	1600	543.1	1400	475.2
9/23/2014	37.2	2500	775.6	2000	620.5
9/30/2014	37.7	2800	880.4	1900	597.4
10/7/2014	40.2	1300	435.8	950	318.5
10/14/2014	60.7	1000	506.2	850	430.3
10/21/2014	40.3	1300	436.9	960	322.7
10/28/2014	47.3	1100	433.9	930	366.9
11/4/2014	39.5	1700	560.0	1500	494.1
11/11/2014	42.3	2300	811.4	2000	705.6
11/18/2014	45.6	2800	1064.9	1900	722.6
11/25/2014	44.5	2400	890.7	2100	779.4
12/2/2014	43.7	2200	801.8	1800	656.0
12/9/2014	41.4	2500	863.2	1800	621.5
12/16/2014	38.7	2500	806.9	2200	710.1
12/23/2014	40.7	2600	882.5	2400	814.7
12/30/2014	44.5	2200	816.5	1900	705.1
1/6/2015	49.7	2400	994.8	2100	870.4
1/13/2015	44.1	3400	1250.5	2900	1066.6
1/20/2015	45.3	3500	1322.3	2700	1020.1
1/27/2015	37.4	3400	1060.5	2800	873.4

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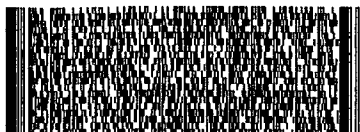
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