



Georgia-Pacific LLC
Consumer Products

Crossett Paper Operations
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November 12, 2014

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

Reference: Georgia-Pacific LLC: Crossett Paper Operations
NPDES Permit # **AR0001210, AFIN 02-00013**
Revised Mercury Minimization Plan Annual Report

Dear Ms. Reiber:

On September 1, 2011 Georgia-Pacific LLC, Crossett Paper Operations submitted a Mercury Minimization Plan as required by Condition No. 20 of Part II of the current NPDES Permit #AR0001210. Below is an outline of activities performed over the past year in accordance with the plan.

Summary of Potential Significant Sources

As described in the plan, mercury may be introduced in trace amounts in both raw materials and chemicals used in the mill. There have been no significant process changes over the past year, which would impact the potential sources described in the plan. However, in August of 2014, the mill transitioned from diaphragm grade caustic to membrane grade caustic for use in the recovery process. This should have a positive impact on the facility's mercury footprint as membrane grade caustic has fewer impurities, including mercury content. There have been no other significant changes in the types of chemicals used.

Control Measures

Public Education

Public education materials were mailed to all City of Crossett water users during the fall of 2011, instructing them on the dangers of mercury contamination and proper disposal of mercury containing devices. In addition, notes are routinely included on water bills and a notice was run on the local cable

Over the past year, quarterly sampling has been initiated at various points in the mill and at the wastewater treatment plant, including Outfall 001 and the discharge from the City of Crossett. A summary of the results is as follows:

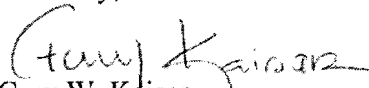
	Hg in ug/L				
	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter
	2013	2013	2014	2014	2014
Outfall 001	ND	0.0031	0.0022	ND	ND
City of Crossett	0.0013	ND	ND	0.0010	0.0013
Fine Paper	ND	ND	ND	0.013	ND
Recovery Area	ND	ND	ND	ND	ND
Pulp Mill Washers	ND	ND	ND	0.0030	ND
#4&5 Tissue	0.0015	ND	ND	0.022	0.0014
#6&7 Tissue	0.0032	0.0013	ND	0.065	0.0016
Board Mill	0.0081	ND	ND	0.0088	ND
Pulp Mill Digesters	0.0011	ND	ND	0.0099	ND
GP Lake (Influent)	0.0017	0.00055	ND	0.0011	0.0002
Process Sewer 1	0.0020	ND	ND	ND	0.0037
Process Sewer 2	ND	ND	ND	ND	ND
Process Sewer 3	0.011	ND	0.0031	ND	ND

We believe the above results indicate that mercury contributions are largely non-detectable in most of the in-plant sources, and the occasional detectable concentrations are not directly related to any process activities. The average level measured at Outfall 001 for the last four quarters is 0.0027 ug/L. As documented in the TMDL for the Ouachita River¹, most mercury in the basin is the result of air deposition. Given the very low levels of mercury measured in the effluent, we do not believe that any changes are necessary to this successful pollution prevention program.

If you have any questions regarding this submittal please feel free to contact Rachel Johnson at (870) 567-8170 or by email at rachel.johnson2@gapac.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,


 Gary W. Kaiser
 Vice President of Manufacturing



¹ "TMDLs for Segments listed for Mercury in Fish Tissue for the Ouachita River Basin, and Bayou Bartholomew, Arkansas and Louisiana to Columbia", FTN Associates for US EPA VI, December 18, 2002.