

Georgia-Pacific Crossett 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

June 28, 2017

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

Re: Georgia-Pacific Crossett LLC - Crossett Paper Operations

NPDES Permit # AR0001210

Settling Basins Trial - Revised Request

Dear Ms. Reiber:

As we discussed on Monday, June 26, 2017, Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) intends to initiate a trial to assess the potential to reduce the generation of sulfides in the mill wastewater treatment system. The mill intends to temporarily take the ash settling basins, that are located downstream of the mill's primary clarifier, out of service. The basins are illustrated on the attached process flow diagram and are operated on an alternating basis (one is in service while the opposite basin is cleaned).

Given the low dissolved oxygen present in the wastewater at this stage of the treatment process, anaerobic biological activity is likely occurring in the basins converting sulfate to sulfide. A portion of this sulfide is in the form of aqueous hydrogen sulfide that is released from the wastewater at the basins and at locations downstream through the treatment system. This hydrogen sulfide potentially contributes to odors.

GP will either configure one of the basins as "flow through" or create a conveyance around the basins to allow implementation of the trial. The alterations will be reversible within a short period of time in the event GP determines that returning the basins to service is desired for treatment reasons. The absence of these basins will not impact the mill's ability to comply with any of the NPDES permit limits. Currently, BOD reduction in the ash settling basins has been estimated at less than 5%. With the aeration horsepower at the

Aerated Stabilization Basin, we would not expect to see a change in BOD loadings at Outfall 001. Any solids that would have been collected in these basins will be collected in the front of the mill's Aerated Stabilization Basin where they can be removed via dredging that is completed on a regular basis. In addition, GP has ongoing efforts to investigate ways to reduce solids loadings going to these basins. Efforts have been made to improve ash handling upstream of the WWTS, and plans are underway to add additional dewatering capabilities in order to improve the primary clarifier efficiency. The mill is investigating an additional sludge press capable of removing up to an additional 45 dry tons per day during this trial period. Polymer addition to aid in the dewatering will also be trialed during this time.

If these efforts lead GP to conclude that permanent changes to the wastewater treatment system are warranted to reduce H2S emissions or odor, GP will work with ADEQ regarding any necessary permitting changes.

GP respectfully requests ADEQ concurrence with this trial plan given our mutual goal to reduce odors in the Crossett community. GP plans to implement this trial as soon as possible. We believe a twelve-month trial would adequately assess whether eliminating these process units would have positive benefits.

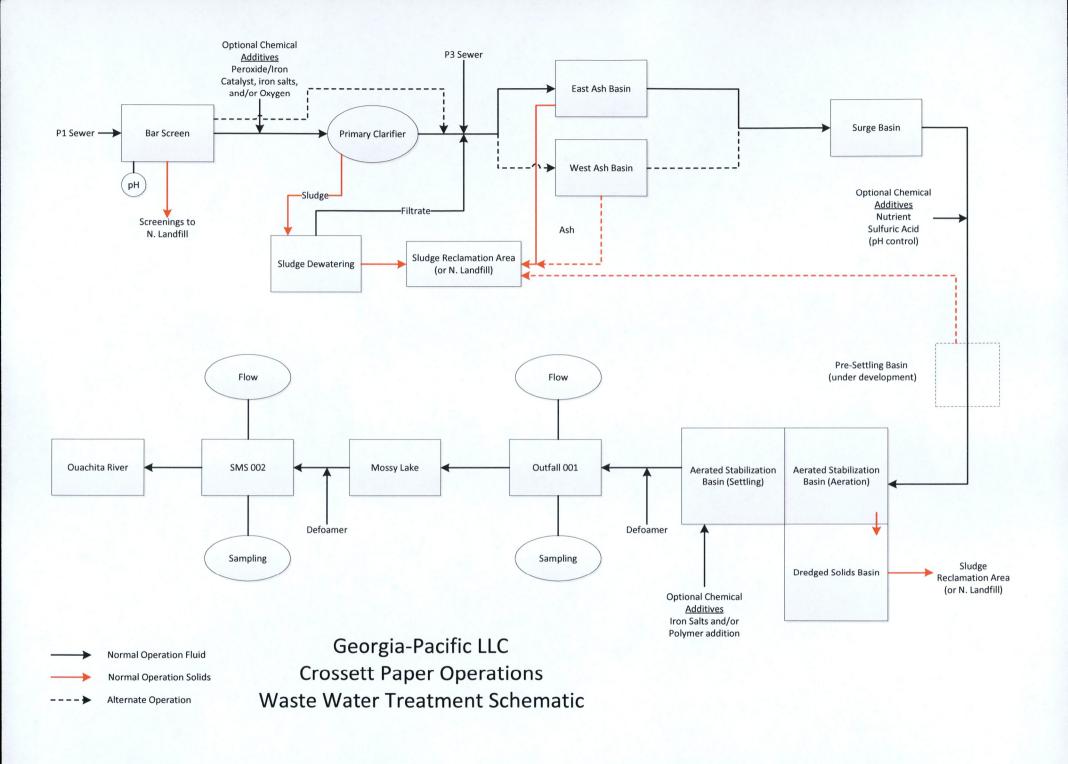
If you have any questions or need additional information prior to this, please feel free to contact me at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,

Sarah M. Ross

Environmental Manager Crossett Paper Operations

cc: Caleb Osbourne, Associate Director, Water Division ADEO



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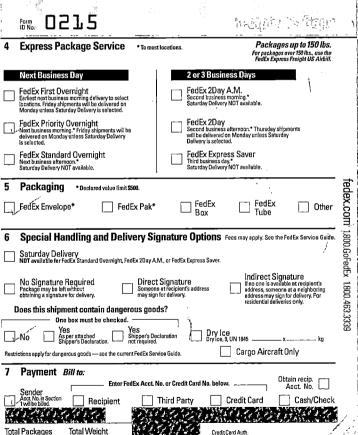
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