



A R K A N S A S  
Department of Environmental Quality

### Site Visit Report

**Facility Name:** Georgia-Pacific, LLC – Crossett Paper Operations

**Permit Number:** AR0001210

**Date of Site Visit:** August 4, 2015

**Permit Engineer:** Loretta Reiber, P.E.

#### Names and Numbers of Personnel Present for Site Visit:

Name	Company	Phone #	E-mail
Loretta Reiber, P.E.	ADEQ	(501) 682-0612	<a href="mailto:reiber@adeq.state.ar.us">reiber@adeq.state.ar.us</a>
Rachel Johnson	GP	(870) 567-8170	<a href="mailto:rachel.johnson2@gapac.com">rachel.johnson2@gapac.com</a>
Mayes Starke	GP	(423) 653-0084	<a href="mailto:thomas.starke@gapac.com">thomas.starke@gapac.com</a>
Brittney McCone	GP	(870) 567-8818	<a href="mailto:brittney.mccone@gapac.com">brittney.mccone@gapac.com</a>

**Front Gate Coordinates:** Latitude: 33° 08' 30"; Longitude: 91° 58' 12"

#### Outfall Information to Confirm/Collect

Outfall	001
Effluent Description	process wastewater (Paper Mill, Plywood Plant, and Studmill operations), sanitary wastewater, landfill leachate, site stormwater <sup>1</sup> , chemical plant, building products, treated effluent from the City of Crossett, truck wash, backwash wastewater, and product stewardship waters
Receiving Stream	the upper reaches of Mossy Lake, then into Coffee Creek, then into Ouachita River in Segment 2D of the Ouachita River Basin.
Monitoring Coordinates/Location	following the final treatment unit (aeration basin) at Latitude : 33° 06' 22.5"; Longitude: 92° 02' 17.2" before discharge to Mossy Lake
Outfall Coordinates	Latitude : 33° 06' 22.55"; Longitude: 92° 02' 17.2"
Treatment Units	screening followed by primary clarifier, settling for ash removal, equalization, aerated lagoon with solids settling, and sludge dewatering
Any changes requested by permittee to limits, terms, etc. for this outfall?	remove dieldrin limit

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Outfall	SMS002
Effluent Description	process wastewater (Paper Mill, Plywood Plant, and Studmill operations), sanitary wastewater, landfill leachate, site stormwater <sup>1</sup> , chemical plant, building products, treated effluent from the City of Crossett, truck wash, backwash wastewater, and product stewardship waters
Receiving Stream	At the transition from Mossy Lake to Coffee Creek then into Ouachita River in Segment 2D of the Ouachita River Basin.
Monitoring Coordinates/Location	after Mossy Lake and prior to Coffee Creek in the general area of the following coordinates: Latitude : 33° 01' 58"; Longitude: 92° 04' 25"
Outfall Coordinates	Latitude : 33° 01' 58"; Longitude: 92° 04' 25"
Treatment Units	none associated with only this outfall.
Any changes requested by permittee to limits, terms, etc. for this outfall?	remove dielrin limit, don't want to have to monitor here if meeting these limits at Outfall 001

Outfall	Internal Outfall 101
Effluent Description	Line 1A of Hardwood Effluent
Receiving Stream	N/A
Monitoring Coordinates/Location	internal outfall 101 (Line 1A – Hardwood) at Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8" and prior to commingling with other waste streams
Outfall Coordinates	Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8"
Treatment Units	none associated with only this outfall.
Any changes requested by permittee to limits, terms, etc. for this outfall?	want monitoring frequencies for all parameters on the same schedule.

Outfall	Internal Outfall 102
Effluent Description	Line 1B of Hardwood Effluent
Receiving Stream	N/A
Monitoring Coordinates	internal outfall 102 (Line 1B – Hardwood) at Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8"and prior to commingling with other waste streams
Outfall Coordinates	Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8"
Treatment Units	none associated with only this outfall.



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Outfall	Internal Outfall 102
Any changes requested by permittee to limits, terms, etc. for this outfall?	want monitoring frequencies for all parameters on the same schedule.

Outfall	Internal Outfall 103
Effluent Description	Line 2 of Softwood Effluent
Receiving Stream	N/A
Monitoring Coordinates/Location	internal outfall 103 (Line 2 – Softwood) at Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8" and prior to commingling with other waste streams
Outfall Coordinates	Latitude : 33° 08' 29.5"; Longitude: 91° 58' 25.8"
Treatment Units	none associated with only this outfall.
Any changes requested by permittee to limits, terms, etc. for this outfall?	want monitoring frequencies for all parameters on the same schedule.

**Proposed Revisions to the Permit**

- a. The condition stating that the permittee has certified that they do not use zinc sulfites have been removed from the permit. These parameters are contained in 40 CFR Part 430, Subpart G – The Pulp, Paper, and Paperboard Point Source Category, Mechanical Pulp Subcategory. This facility operates a chemical pulp mill so it is not subject to that subpart. It is important to note that the permittee is required by Part II, Section D, Item 1 to notify the Department of any changes which would affect the characteristics of the effluent.
- b. The monitoring frequency for Dieldrin at Outfall 001 and SMS 002 has been reduced to once per quarter since this parameter has not been detected in the effluent during the term of the previous permit.
- c. The MMP language in Part II of the permit has been revised since the MMP has already been developed and implemented. The condition will continue to include the requirement to submit annual reports. The permittee will be required to submit any changes to the MMP to the Department for approval prior to implementation.
- d. Part II, Condition No. 20 has been added to the permit to allow the facility to request exemption from the Chloroform monitoring requirements as allowed by 40 CFR 430.02(f).

## Issues Discussed

- What do they mean by 24-hr time composite?

They want to composite samples based on time, i.e., take a sample every hour and combine without regard to flow.

- Discuss request for monitoring frequency reductions.

I stated that we typically don't reduce monitoring frequency in consecutive permits. The facility personnel responded that they were asking for it since they want all of the parameters at the internal outfalls to be on the same schedule.

- Addition of chemicals in the ASB.

Rachel will be submitting the usage rates and the MSDS.

- Why was 62 feet set as the level at which SMS002 sampling would not need to occur?

There is "push back" from the river above this level which prevents the permittee from obtaining representative samples.

Facility will be submitting the following:

- Certification in regards to the 316(b) requirements. Most of the cooling water is obtained from a well but some may be obtained from the intake structure on Lake Georgia Pacific.
- Pictures of the Hydrogen Peroxide and Iron Catalyst addition at the Chemical Plant.
- Information concerning the addition of chemicals in the ASB.
- They will be contacting LDEQ in regards to their request to remove Dieldrin.
- The DMR information for Dieldrin at SMS002 in September 2011 must be corrected.

The permittee also made a request to be allowed to not be required to monitor at SMS002 if the water quality limits are being met at Outfall 001. I stated that I would look into this matter.



Clarifier Bypass. This is used only in emergency situations.



Hydrogen Peroxide and Iron catalyst feed system at clarifier.



Hydrogen Peroxide and Iron catalyst feed system at clarifier.



Pumps for feeding Hydrogen Peroxide and Iron catalyst at clarifier.



P1 Sewer



Bar Screen



Clarifier



Dewatering of solids from the clarifier





P3 Sewer



East Ash Pond



West Ash Pond – permittee is in the process of cleaning out solids



Empty Surge Basin



Second Empty Surge Basin



Channel from Surge Basin to ASB



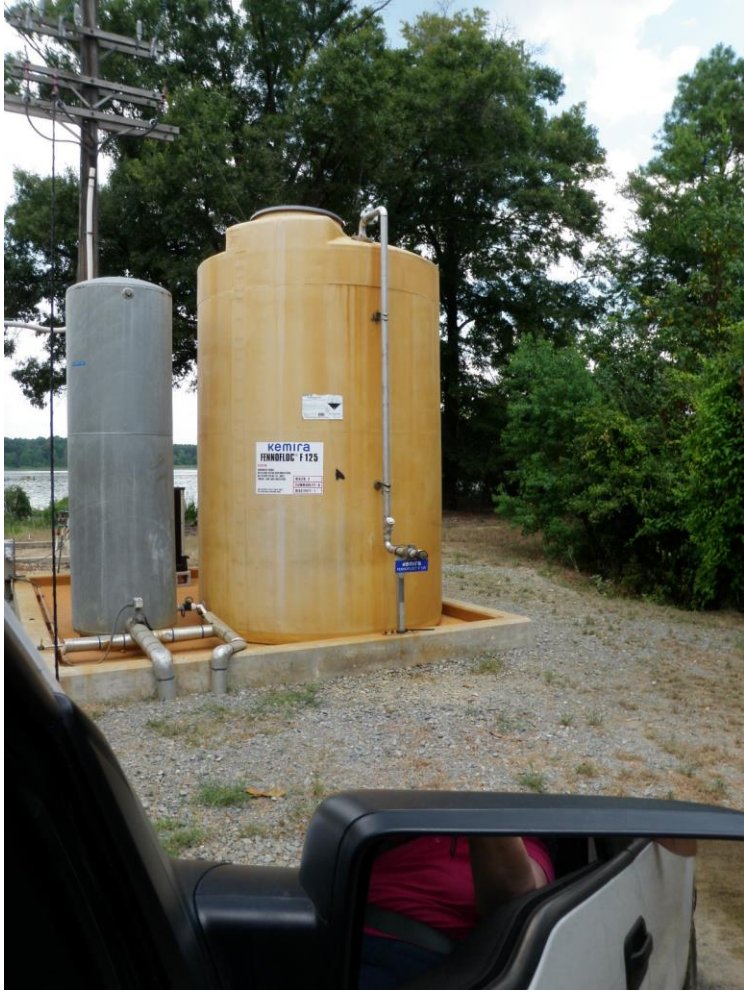
Surge Basin Channel looking towards ASB



Surge Basin Channel turning towards ASB



Upper ASB with bacteria feed system



Tanks for Iron feed at ASB



Defoamer addition at Outfall 001



View at defoamer addition looking towards ASB and foam curtain





Pictures at Outfall 001 – foam is caused by change in elevation and quickly dissipates.



Outfall 001 – effluent flowing off the edge is causing foam to appear in the stream but the foam quickly dissipates.



SMS002



Outlet of Mossy Lake



Outlet of Mossy Lake



Confluence of Coffee Creek and the Ouachita River



Confluence of Coffee Creek and the Ouachita River



Confluence of Coffee Creek and the Ouachita River



City of Crossett wastewater pipe discharging into GP system



Hydrogen Peroxide and Iron catalyst feed into P2 sewer



Hydrogen Peroxide and Iron catalyst feed into P2 sewer