

ADEQ

ARKANSAS
Department of Environmental Quality

March 17, 2015

Ms. Rachel M. Johnson
Georgia-Pacific, LLC - Crossett Paper Operations
100 Mill Supply Road
Crossett, Arkansas 71635

Re: Sludge Pond Closure Plan

Dear Ms. Johnson,

I am writing in response to your request to Ms. Loretta Reiber to dispose of solids from waste water basins in a sludge pond as part of a continuing closure plan. The Solid Waste Management Division ("SWMD") has reviewed the information available to us regarding the sludge pond closure plan. SWMD has been informed that a sludge closure plan has been utilized to dispose of waste water basin sediments since around 1995.

Based on the facts available it is the determination of the SWMD that the implementation of the sludge pond closure plan could constitute disposal of solid wastes at a disposal site other than a facility for which a permit has been issued by ADEQ. Disposal of solid wastes at an unpermitted facility is a violation of Ark. Code Ann. § 8-6-205(a)(3).

Please contact me at your earliest convenience to discuss this matter further and a potential transition from this current practice to utilizing other methods of addressing the waste water basin sediments. You may contact me at (501) 682-0600 or by email at jonesb@adeq.state.ar.us.

Sincerely,



Benjamin T. Jones

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

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C.C.: John Bailey, Permits Branch Manager, Water Division
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