

Wilson, Tabatha

From: Bailey, John
Sent: Monday, April 07, 2014 3:33 PM
To: Wilson, Tabatha; Reiber, Loretta
Subject: FW: Surface Water Containment Pond Closure Certification for Georgia-Pacific LLC Facility
Attachments: L-J Bailey 2014-04-07.pdf

Tabatha,

My guess is they mailed this in but I thought I would send this to you to ensure it gets on the web.

This will be assigned to Loretta.

Thanks,
John

From: Rex Robbins [<mailto:rmr@ftn-assoc.com>]
Sent: Monday, April 07, 2014 3:16 PM
To: Bailey, John
Subject: Surface Water Containment Pond Closure Certification for Georgia-Pacific LLC Facility

John,

Could you see that this gets entered into the system and reviewed? Thanks!

Rex Robbins, PE
FTN Associates Ltd
3 Innwood Circle
Little Rock, AR 72116

501-225-7779 (w)
501-772-8503 (m)



water resources / environmental consultants

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April 7, 2014
bailey@adeq.state.ar.us

Mr. John Bailey, PE
Permits Branch Manager
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Surface Water Containment Pond Closure at Georgia-Pacific LLC Facility
AFIN: 02-00013; Permit No. AR0001210
FTN No. R06390-0100-001

Dear Mr. Bailey:

On behalf of Georgia-Pacific LLC in Crossett, Arkansas, we are submitting this letter as notification regarding the completion of closure activities associated with the surface water containment pond at the Crossett facility. The closure activities were outlined in a closure plan prepared by FTN Associates Ltd. (FTN) dated May 3, 2013. The Arkansas Department of Environmental Quality (ADEQ) approved the closure plan in a letter dated July 16, 2013.

On January 8, 2014, FTN visited the site and determined that the excavation of wastewater sediments from the pond was complete. To confirm clean closure, samples were taken of the pond bottom and from the sloping sides. In collecting these samples, composites were formed from each quadrant of the pond. The samples were delivered to American Interplex Corporation Laboratories (AIC) of Little Rock, Arkansas, and analyzed for the parameters listed in the referenced closure plan. Test results were compared to the standards identified in the closure plan and are shown in Table 1. Following the confirmation of clean results, the authorization was provided to the company to complete backfilling the pond, along with mulching and seeding. These activities have been completed and are documented in Photos 1, 2, and 3 (attached).

Table 1. Confirmation test results.

| Parameter | Screening Level (mg/Kg) | SE Quad (mg/Kg) | NW Quad (mg/Kg) | NE Quad (mg/Kg) | SW Quad (mg/Kg) | Pass/Fail |
|---|-------------------------|-----------------|-----------------|-----------------|-----------------|-----------|
| Total Petroleum Hydrocarbons (TPH)- Gasoline-Range Organics | 440 | 38 | <1.0 | <1.0 | <1.0 | pass |
| TPH - Diesel Range Organics | 2,300 | 130 | 280 | 440 | 1,200 | pass |
| TPH – Motor Oil Organics (residual oil) | 4,500 | 43 | 85 | 180 | 510 | pass |
| Formaldehyde | 1.2x10 ⁵ | 1.3 | <1.0 | 1.1 | <1 | pass |
| Methanol | 3.1x10 ⁵ | <0.5 | <0.5 | <0.5 | <0.5 | pass |
| Toluene | 4.5x10 ⁵ | 0.0052 | <0.005 | <0.005 | <0.005 | pass |
| Acetaldehyde | 52 | <1.0 | <1.0 | <1.0 | <1.0 | pass |

All of the above closure activities were completed in basic accordance with the closure plan. The facility's stormwater plan remains in effect.

This letter is intended to comply with the requirement for closure certification as stated in your approval letter. We would appreciate your acknowledgement of this letter and agreement with the undersigned engineer's assessment and certification that closure activities are completed.

If you have any questions regarding this certification, please do not hesitate to contact me or Wes Bramlett, PE, at (501) 225-7779.

Kindest regards,
 FTN ASSOCIATES, LTD.

Rex Robbins, PE
 Senior Project Manager

RMR/dlc

Attachment

CC: Mark Woods, Georgia-Pacific LLC (with attachment)



ATTACHMENT

Representative Photographs





Photo 1. Excavated pond January 8, 2014.



Photo 2. Completed closure.



Photo 3. Completed closure.