



ARKANSAS  
Department of Environmental Quality

## Interoffice Memorandum

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FROM: Loretta Reiber, P.E., Engineer *LR* *For Fox*

DATE: March 24, 2017

SUBJECT: Temporary Variance Request, Georgia-Pacific LLC - Crossett Paper Operations  
NPDES Permit No. AR0001210, AFIN 02-00013

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Georgia-Pacific LLC - Crossett Paper Operations submitted a request dated March 21, 2017, for a Temporary Variance to remove the restrictions on the usage of Hydrogen Peroxide and the organic iron catalyst which are contained in NPDES Permit No. AR0001210.

In the draft permit, which is currently under review by EPA Region VI and has therefore not been sent to public notice, the Department has proposed removing the usage limits on Hydrogen Peroxide and replacing the usage limit on the organic iron catalyst with monitoring and reporting requirements for Total Dissolved Iron.

In accordance with A.C.A. § 8-4-230(b), the factors that are required to be considered in deciding whether to grant a Temporary Variance are addressed as follows:

- The environmental and public health effects of the request.

The addition of Hydrogen Peroxide and the organic iron catalyst is to address odors associated with the mill's effluent and permitted wastewater treatment system. By eliminating the usage limits, the mill will be in a better position to proactively anticipate and respond to conditions that could result in odors, providing a significant benefit to the surrounding community. Furthermore, consistent with the draft renewal permit, the mill currently conducts both WET testing and monthly monitoring of Total Dissolved Iron levels at Outfall 001 and will continue to do so pending the permit renewal. The iron levels in the effluent have typically been less than 0.5 mg/l.

- Any economic advantage obtained by the requesting party over other similarly situated facilities that are operating in accordance with similar permit conditions and that have not requested a temporary variance.

The variance will not result in any economic advantage to the facility. To the contrary, any additional chemical usage allowed by the variance would result in additional costs incurred by the facility.

- Whether strict compliance would result in the substantial curtailment or closing down of an existing business seeking a temporary variance.

While strict compliance would not result in curtailment of the facility's operations, it does restrict their ability to address community concerns regarding odor associated with the wastewater treatment system. The ability to use these chemicals without usage limits during higher sulfide events will help reduce sulfide emissions and treatment system related odors. To date, the use of the advanced oxidation system has beneficially reduced odor in the community as well as provided other beneficial treatment impacts including reduced BOD levels and color reduction. Unrestricted use of the system is in the public interest and will provide further benefits to the community.

- Whether strict compliance with permit terms is inappropriate because of conditions beyond the control of the facility.

Strict compliance with the usage limits is not appropriate at this time. Usage of the chemicals has allowed the facility to control odors. Discontinuing the usage limits will allow the facility more flexibility in controlling odors.

- Whether the request is prompted by recurrent or avoidable compliance problems.

The request is not prompted by recurrent or avoidable compliance problems.

- Whether a review of the operational history of the facility reveals relevant information.

In recent years, odor complaints against the facility appear to have increased. Discontinuing the usage limits will allow the facility more flexibility in controlling odors.

- Whether the public interest will be served by a temporary variance.

Public interest will be served by this temporary variance since it will allow the facility to better control odors.