

Tanya Ester (adpce.ad)

From: Loretta Carstens (adpce.ad)
Sent: Wednesday, November 20, 2024 9:48 AM
To: Tanya Ester (adpce.ad); Colby Ungerank (adpce.ad); Zachary Carroll (adpce.ad); Jessica Sears (adpce.ad)
Subject: FW: Please see attached, AR0001210, 02-00013, GP Crossett
Attachments: 20241120090618446.pdf

This is the Temporary Variance Request that I told you was coming in. Please create the ePortal entry and assign it to me.

Thanks.

-----Original Message-----

From: Bailey Taylor (adpce.ad) <Bailey.Taylor@arkansas.gov>
Sent: Wednesday, November 20, 2024 9:42 AM
To: Loretta Carstens (adpce.ad) <Loretta.Carstens@arkansas.gov>; Jessica Sears (adpce.ad) <Jessica.Sears@arkansas.gov>; Stacie Wassell (adpce.ad) <Stacie.Wassell@arkansas.gov>
Subject: FW: Please see attached

-----Original Message-----

From: Caletha Harris <Caletha.Harris@arkansas.gov>
Sent: Wednesday, November 20, 2024 9:33 AM
To: bailey.taylor <bailey.taylor@adeq.state.ar.us>
Cc: Cathy Harris (adpce.ad) <Cathy.Harris@arkansas.gov>
Subject: Please see attached

Caletha L. Harris | Senior Record Specialist Arkansas Energy & Environment | Office of Operations
5301 Northshore Drive | North Little Rock, AR 72118
Tele: 501.682.0008 | email: Caletha.Harris@arkansas.gov

-----Original Message-----

From: EE.COPIERMAILBOX@arkansas.gov <EE.COPIERMAILBOX@arkansas.gov>
Sent: Wednesday, November 20, 2024 8:06 AM
To: Caletha.Harris@adeq.state.ar.us
Subject: Message from "RNP5838799917F8"

This E-mail was sent from "RNP5838799917F8" (IM 5000).

Scan Date: 11.20.2024 09:06:18 (-0500)
Queries to: EE.COPIERMAILBOX@arkansas.gov



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
100 Mill Supply Road
P.O. Box 3333
Crossett, AR 71635
www.gp.com

November 19, 2024

Loretta Carstens
Permit Engineer
Office of Water Quality
Arkansas Energy and Environment
5901 Northshore Drive
North Little Rock, AR 72118-5317

RE: Temporary Variance for Reduced Monitoring of AOX and Dioxin
NPDES Permit AR0001210; AFIN 02-00013

Dear Mrs. Carstens:

To follow-up our November 4, 2024, discussion, we are requesting reduced monitoring as the requirements in 40 CFR Part 430 are no longer applicable to the facility after the partial shutdown in November of 2019. We are currently monitoring Adsorbable Organic Halogens (AOX) three times per week and 2,3,7,8-Tetrachlorodibenzo-p-dioxin (Dioxin) once per quarter and would like to request a variance to reduce the monitoring requirement for both parameters to once per year. We have requested that these parameters be removed from the permit once the renewal is issued. The current permit expired on October 31, 2015, and has been administratively extended.

Please find attached a completed Request for Temporary Variance for Georgia-Pacific Crossett LLC along with a check for the \$200 fee. If you have any questions or need additional information, please contact Sarah Ross at (870) 415-6363 or Sarah.Ross@gapac.com or Rachel Johnson at (870) 415-6352 or Rachel.Johnson2@gapac.com.

Sincerely,

Deborah L. Coduto
Vice-President of Manufacturing

Internal use, only
[Priority – Time sensitive]

Zylab edit inputs
Media: Water
Type: Permit
Assignment:
Note: Interim Authority Variance Request

REQUEST FOR INTERIM AUTHORITY OR TEMPORARY VARIANCE ENCLOSED

*This request is Time Sensitive and Requires a Director's decision
within 10 Days of Receipt*

Attention: Associate Director, Office of Water Quality, DEQ
Submit to: 5301 Northshore Drive
North Little Rock, AR 72118-5317

Permittee: Georgia-Pacific Crossett LLC

Permit Number: AR0001210

AFIN: 02-00013

- ☐ Interim Authority Request
- ☒ Temporary Variance Request

Has the permittee had a pre-application meeting or conference call with DEQ? Please note that failure to conduct a pre-application meeting or conference call with DEQ will result in the application being returned.

- ☒ Yes on 11/4/2024 with Loretta Carstens and Zachary Carroll
- ☐ No

Is the \$200 fee accompanying this request? Please note that a decision on this request will not be issued until the \$200 fee has been received.

- ☒ Yes
- ☐ No. The fee will be submitted Click here to specify when & how the fee will be submitted.

Has a permit application been submitted for the activity requested under this Interim Authority/Temporary Variance?

- ☒ Yes on 5/4/2014
- ☐ No Click here to state why a permit application has not been or when one will be submitted. A permit renewal application was originally submitted on May 4, 2014. On August 20, 2019, representatives from GP met with the agency to discuss plans to permanently shut down the bleached board machines, woodyard, pulp mill, and solid fuel boilers. This meeting was

Revised October 2024

followed up with updated application forms to reflect the new operational footprint on October 4, 2019. Application forms were updated and submitted again April 4, 2023, in which we specifically requested that the monitoring requirements for AOX and Dioxin be removed from the permit as the requirements in 40 CFR Part 430 no longer apply to the facility.

Contact Information

Name, Title: Deborah Coduto, Vice President of Manufacturing

Address: PO Box 3333, Crossett AR 71635

Phone: 870-415-6257

Email: deborah.coduto@gapac.com

Summary of Request: Request for reduced monitoring of Adsorbable Organic Halogens (AOX) and 2,3,7,8-Tetrachlorodibenzo-p-dioxin (Dioxin) to a frequency of once per year

Is the equipment/process new to this facility?

- ☐ Yes – Equipment is new to the facility.
- ☐ Yes – Process is new to the facility.
- ☒ No – Equipment and process are both existing at the facility.
- This question is not applicable as there are no new processes or equipment being introduced.

Will the effluent characteristics be affected?

- ☐ Yes Click here to explain how effluent characteristics will be affected. Include current permit requirements.
- ☒ No
- Effluent characteristics will not be affected as we are asking only for a monitoring frequency reduction.

Please address the following for an **Interim Authority or Temporary Variance Request**:

- a. The environmental and public health effects of the request.
There will be no environmental or public health effects as a result of this request.
- b. 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/interim authority.
No economic advantage to GP is anticipated. On the contrary, GP is disadvantaged by continuing to perform compliance sampling for effluent constituents which are no longer discharged. Granting the requested variance will eliminate this disadvantage to GP as compared to similarly situated facilities.
- c. Whether strict compliance would result in the substantial curtailment or closing down of an existing business seeking a temporary variance.
No curtailments or shutdowns are expected as a result of continued compliance of the monitoring requirements.
- d. Whether strict compliance with permit terms is inappropriate because of conditions beyond the control of the facility.
The facility has been operating under an administratively extended permit since 2015 and had planned to wait on the reissuance of the permit for these monitoring requirements to be removed. However, with the uncertainty of permit issuance timeline and increased hardship of obtaining specialized analytical testing, the facility would like to request a temporary variance.
- e. Whether the request is prompted by recurrent or avoidable compliance problems.
The request is not prompted by any recurrent or avoidable compliance problems. The reason for the request is that the operations for which the sampling was required no longer exist and all associated equipment has been decommissioned and dismantled. Moreover, due to the specialized nature of AOX and dioxin analysis and the limited number of third-party labs qualified to run the tests, GP is experiencing increased difficulty obtaining results in a timely manner.
- f. Whether a review of the operational history of the facility reveals relevant information.
Changes in operation in November of 2019 resulted in the 40 CFR Part 430 requirements no longer being applicable to the facility.
- g. Whether the public interest will be served by a temporary variance.
We do not feel that the public interest will be affected by this variance.

To address for Interim Authority Requests, Only:

- a. Whether the applicable permitting applications were timely and completely submitted.
The permit renewal application was submitted timely, and updates have been submitted as necessary.
- b. Whether there has been a delay in the final permitting action caused by conditions beyond the control of the person requesting the interim authority.
Permit issuance has been delayed and the timing of its issuance is uncertain at this time.
- c. Whether contractual or other business obligations will become due before a proper permit can be issued.
There are no contractual or other business obligations that will be affected by this variance.
- d. Whether the public interest will be served by construction or operation during the application review and permit issuance process.
There will be no construction or operational changes as a result of this variance.

Signatory Requirements for Interim Authority and Temporary Variance Requests

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I further certify under penalty of law that all analyses reported as less than detectable in this application or attachments thereto were performed using the EPA approved test method having the lowest detection limit for the substance tested."

Responsible Official Name and Title (printed): Deborah Coduto, Vice President of Manufacturing

Responsible Official Signature: Deborah Coduto

Date: 11/19/24



Georgia-Pacific Financial Mngt LLC
P.O. Box 5020
Wichita, KS 67201

00008517770000851777

PAGE: 1 of 1

DATE: November 12, 2024

CHECK NUMBER: 0000851777

AMOUNT PAID: \$200.00

Inquiries To: SVC_APSVC@GAPAC.COM

00011 1717 CKS ND 24317 - 0000851777 NNNNNNNNNNN 3175100003201 XAERN3 C
STATE OF ARKANSAS DBA DEPT OF
ENVIRONMENTAL
5301 NORTHSHORE DR
NORTH LITTLE ROCK AR 72118-5317



Vendor No: 1900290

Date	Invoice Number	Contract PO Number	Description	Gross Amount	Discount	Net Amount
11/06/24	1900007598	330531124000190		\$200.00	\$0.00	\$200.00
TOTALS				\$200.00	\$0.00	\$200.00

PLEASE DETACH BEFORE DEPOSITING CHECK



Georgia-Pacific Financial Mngt LLC
P.O. Box 5020
Wichita, KS 67201

CHECK
NUMBER 0000851777

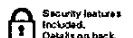
50-937
213

November 12, 2024

PAY TO THE ORDER OF: STATE OF ARKANSAS DBA DEPT OF
ENVIRONMENTAL
5301 NORTHSHORE DR
NORTH LITTLE ROCK, AR 72118-5317

CHECK AMOUNT
\$200.00

EXACTLY *****200 DOLLARS AND 00 CENTS



JPMorgan Chase Bank, N.A.
Syracuse, NY



Authorized Signature