



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
100 Mill Supply Road
P.O. Box 3333
Crossett, AR 71635
(870) 567-8000
(870) 364-9076 (fax)
www.gp.com

February 29, 2016

John Bailey, P.E.
Technical Assistance Manager
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Crossett LLC - Crossett Paper Operations
NPDES Permit # AR0001210
Trial of Source Control of Sulfides

Dear Mr. Bailey:

As we discussed by telephone on February 25, 2016, Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) intends to initiate a trial to control the generation of sulfides in the mill process.

GP presently applies hydrogen peroxide and an organic iron catalyst to the primary clarifier and at a point in the mill (i.e., the P2 sewer) to oxidize sulfide. This was approved in the NPDES permit modification issued on October 31, 2015.

Based on evaluation of sources of sulfide from within the mill manufacturing process, GP has identified a particularly concentrated source in the green liquor processing area (the green liquor dregs). GP intends to initiate a trial utilizing the same hydrogen peroxide and iron catalyst system applied to this concentrated source. As this is a source control project (i.e., it is preventing sulfide from getting into the combined wastewater stream), GP does not believe that this source control effort requires permitting, or a modification to the permit since it is well within the manufacturing process, upstream of the wastewater treatment system. A key benefit of this project, however, could be to reduce the need to apply additional hydrogen peroxide and iron catalyst at the P2 sewer and primary clarifier.

If the ADEQ agrees with this position, GP plans to implement this trial as soon as possible, likely during the month of March 2016. We believe a six month trial of this project would adequately demonstrate that this source control would have positive benefits. Given the potential benefits associated with the trial, we request that ADEQ provide any feedback at its earliest convenience.

If you have any questions or need additional information prior to this, please feel free to contact me at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,

A handwritten signature in cursive script that reads 'Sarah M. Ross'.

Sarah M. Ross
Environmental Manager
Crossett Paper Operations

ORIGIN ID: ELDA (870) 567-8812
REBECCA BLANKENSHIP
GEORGIA-PACIFIC
100 SUPPLY ROAD
DROP POINT 33
CROSSETT, AR 71635
UNITED STATES US

SHIP DATE: 29FEB16
ACTWGT: 0.50 LB
CAD: 102787395/INET3730

BILL SENDER

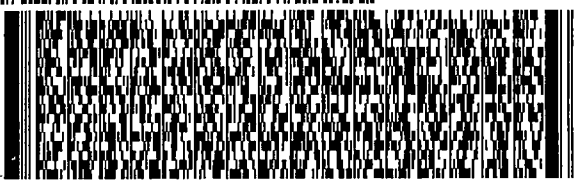
TO JOHN BAILEY, P.E.
ADEQ
WATER DIVISION
5301 NORTSHORE DRIVE
NORTH LITTLE ROCK AR 72118

540J11CF34727F

(870) 567-8170
INV:
PO:

REF: REQUEST TO RUN TRIAL ADDED 02

DEPT:



1 of 2

TUE - 01 MAR 10:30A
PRIORITY OVERNIGHT

TRK# 7757 5952 9527
0201

MASTER

X2 LITA

72118
AR-US LIT



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