

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.qp.com

June 22, 2017

Loretta Reiber, P.E.
Engineer
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Georgia-Pacific Crossett LLC - Crossett Paper Operations

NPDES Permit # AR0001210 Trial to Bypass Settling Basins

Dear Ms. Reiber:

As we discussed, Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) intends to initiate a trial to assess the potential to reduce the generation of sulfides in the mill wastewater treatment system. The mill intends to temporarily bypass the ash settling basins that are located downstream of the mill's primary clarifier. The basins are illustrated on the attached process flow diagram and are operated on an alternating basis (one is in service while the opposite basin is cleaned).

Given the low dissolved oxygen present in the wastewater at this stage of the treatment process, anaerobic biological activity is likely occurring in the basins converting sulfate to sulfide. A portion of this sulfide is in the form of aqueous hydrogen sulfide that is released from the wastewater at the basins and at locations downstream through the treatment system. This hydrogen sulfide potentially contributes to odors.

GP will either configure one of the basins as "flow through" or create a conveyance around the basins to allow implementation of the trial. The alterations will be reversible within a short period of time in the event GP determines that returning the basins to service is desired for treatment reasons. The absence of these basins will not impact the mill's ability to comply with any of the NPDES permit limits. Any solids that would have been collected in these basins will be collected in the front of the mill's Aerated Stabilization Basin where they can be removed via dredging that is completed on a regular basis. In addition, GP has ongoing efforts to investigate ways to reduce solids loadings going to these basins (i.e. improvements in ash handling in the mill and upcoming work to improve clarifier efficiency).

If this trial effort leads GP to conclude that permanent changes to the wastewater treatment system are warranted to reduce H2S emissions or odor, GP will work with ADEQ regarding any necessary permitting changes.

GP respectfully requests ADEQ concurrence with this trial plan given our mutual goal to reduce odors in the Crossett community. GP plans to implement this trial as soon as possible. We believe a twelve-month trial would adequately assess whether eliminating these process units would have positive benefits.

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.

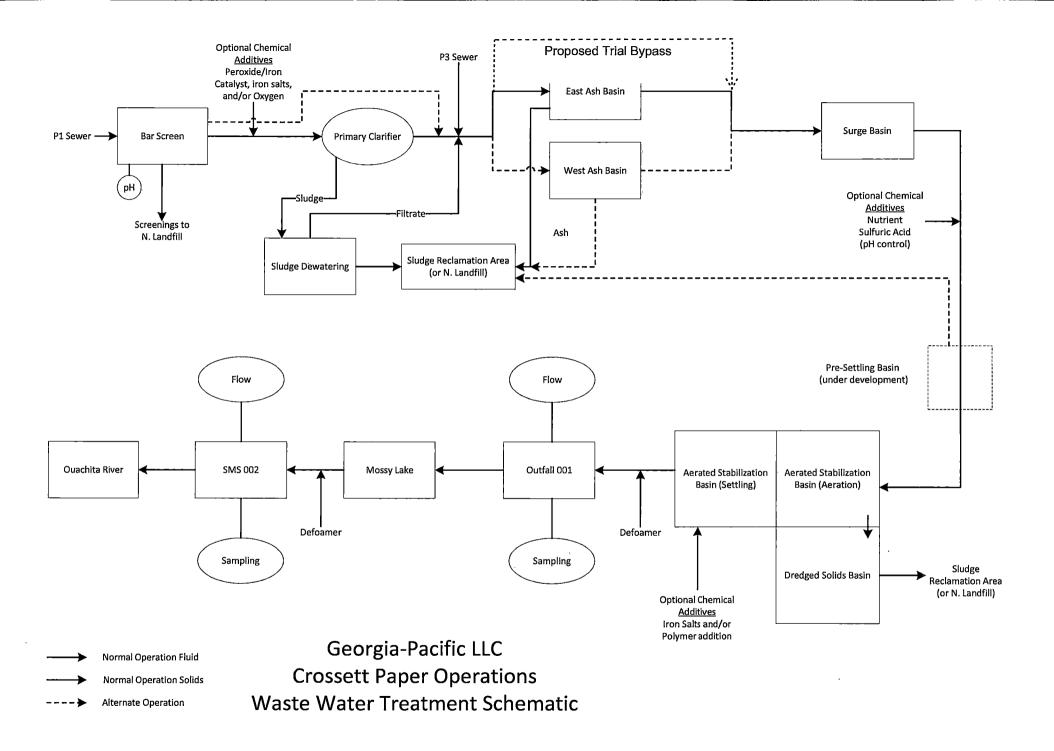
Sincerely,

Sarah M. Ross

Environmental Manager Crossett Paper Operations

rahmke

cc: Caleb Osbourne, Associate Director, Water Division ADEQ



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

SHIP DATE: 22JUN17 ACTWGT: 0.20 LB CAD: 102787395/INET3850

BILL SENDER

LORETTA REIBER ADEQ 5301 NORTHSHORE DR

NORTH LITTLE ROCK AR 72118 (501) 682-0718 REF: NV: PO:

FRI - 23 JUN 10:30A **PRIORITY OVERNIGHT**

7794 7388 4221

72118 LIT

- Use the 'Print' button on this page to print your label to your laser or inkjet printer.
 Fold the printed page along the horizontal line.
 Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.