



Georgia-Pacific Consumer Operations LLC

Crossett Paper Operations
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September 6, 2018

Caleb Osbourne
Associate Director – Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific Consumer Operations LLC - Crossett Paper Operations
NPDES Permit # AR0001210
Request for Variance Extension – AR Code § 8-4-230

Dear Mr. Osborne:

On March 29, 2017, ADEQ granted Georgia-Pacific Consumer Operations LLC, Crossett Paper Operations' (GP's) March 21, 2017 request for a Temporary Variance to discontinue the usage limits for hydrogen peroxide and the organic iron catalyst set forth in Part II. Paragraph 21 of NPDES Permit # AR0001210. The variance was granted for a period of 90 days and allows the unrestricted use of hydrogen peroxide and organic iron catalysts, AOTech CW and AOTech S, to control sulfides and other odorous compounds in the effluent streams and the wastewater treatment plant, and requires monthly sampling of Total Dissolved Iron. This variance was extended for an additional 90 days on June 21, 2017, September 20, 2017, December 14, 2017, March 20, 2018 and June 14, 2018. Prior to the issuance of the variance, the usage limits restricted the mill's ability to address odor associated with the facility's effluent and permitted wastewater treatment plant.

Pursuant to AR Code § 8-4-230, GP is requesting ADEQ grant a sixth extension to the variance so that it remains in effect until renewal of NPDES Permit #AR0001210. As set forth in our original request for the variance, this is consistent with changes to the pending renewal of NPDES Permit # AR0001210, which ADEQ submitted to EPA for review on February 6, 2017. The Fact Sheet for the draft permit specifically addresses the removal of the usage limits as follows:

Request 6: In a letter dated March 1, 2016, the permittee requested that the chemical usage restrictions for Hydrogen Peroxide as well as the restrictions for the organic iron catalysts, AOTech CW and AOTech S, be removed from the permit. The purpose of the chemical usage is to control odor, not provide treatment of the wastewater. There are no adverse environmental impacts. To the contrary, the use of the chemicals has beneficially reduced odor in the community. The levels of BOD5 and color in the effluent have been reduced as well.

Response: Hydrogen Peroxide breaks down into water and oxygen, byproducts which will not harm the effluent or the water quality of the receiving stream. Therefore, the Hydrogen Peroxide usage requirements will be removed from the permit. The purpose of the usage restrictions was to verify that the levels of Total Dissolved Iron are below that which would cause toxicity issues in the effluent. This purpose may also be achieved through the required WET testing and monitoring and reporting of the Total Dissolved Iron levels in the effluent at Outfall 001. Therefore, the usage restrictions for the organic iron catalysts have been replaced with a requirement to monitor and report the levels of Total Dissolved Iron in the effluent at Outfall 001.

Furthermore, this request to extend the variance continues to be consistent with the requirements set forth in AR Code § 8-4-230. In considering a request for a variance, the director shall consider:

- The environmental and public health effects of the temporary variance

As set forth above, the purpose of the hydrogen peroxide and iron catalyst addition 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 in the effluent at Outfall 001, and will continue to do so pending the permit renewal. The dissolved iron levels in the effluent in 2017 and 2018 have typically been less than 0.6 mg/L.

- Any economic advantage obtained by the party requesting the temporary variance over other similarly situated facilities . . .

Extending the variance will not result in any economic advantage to Georgia-Pacific. To the contrary, with the variance, Georgia-Pacific will incur added costs associated with the additional chemical usage.

- Whether strict compliance would result in the substantial curtailment or closing down of an existing or proposed business, plant or operation

While strict compliance would not result in curtailment of Georgia-Pacific's operations, it does restrict Georgia-Pacific's ability to address community concerns regarding odor associated with effluent and 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 increased BOD reduction and color reduction. Unrestricted use of the system is in the public interest and will continue to provide further benefits to the community.

Since it was issued on March 29, 2017, GP has utilized the flexibility provided by the variance. It is believed that this flexibility allows us to monitor sulfides and adjust chemical feed rates to minimize potential risk of offsite impact. GP would like to maintain this flexibility to address sulfide generation during variable operating conditions.

For the reasons set forth above, Georgia-Pacific respectfully requests that ADEQ extend the variance from the odor chemical usage limits specified in Part II. Paragraph 21 of the permit until the pending renewal permit is finalized and in effect. We believe this variance is in the best interest of the community, protective of the environment and consistent with the pending renewal.

In accordance with ADEQ's June 21, 2017 letter, we are submitting this request for an extension three weeks prior to the September 27, 2018 expiration of the Temporary Variance, and appreciate ADEQ's prompt response to this request. Pursuant to AR Code § 8-4-230(a)(3), no additional fee is required for a request for extension. However, should you need any additional information, please contact Sarah Ross at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael L. Hohnadel".

Michael L. Hohnadel
Vice President - Manufacturing
Crossett Paper Operations

FedEx Package
Express US Airbill
FedEx
Tracking
Number

8115 5902 3782

1 From

Date

8-6-18

Sender's
Name

REBECCA BLANKENSHIP

Phone

870 567-8812

Company

GEORGIA PACIFIC/ENVIRONMENTAL

Address

100 SUPPLY RD

Dept./Floor/Suite/Room

City

CROSSETT

State

AR ZIP 71635

2 Your Internal Billing Reference

3 To

Recipient's
Name

Loretta Reiber

Phone

Company

AR Dept. of Env. Quality

Address

5301 Northshore Dr.

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address

Use this line for the HOLD location address or for continuation of your shipping address.

City

North Little Rock

State

AR ZIP 72118

0126751211



8115 5902 3782

Form
ID No.

0215

Recipient's Copy

4 Express Package Service

* To most locations.

Packages up to 150 lbs.

For packages over 150 lbs., use the
FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight

Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☒ FedEx Priority Overnight

Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Standard Overnight

Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.

Second business morning.* Saturday Delivery NOT available.

☐ FedEx 2Day

Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Express Saver

Third business day.* Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

☒ FedEx Envelope*☐ FedEx Pak*☐ FedEx Box☐ FedEx Tube☐ Other

6 Special Handling and Delivery Signature Options

Fees may apply. See the FedEx Service Guide.

☐ Saturday Delivery

NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required

Package may be left without obtaining a signature for delivery.

☐ Direct Signature

Someone at recipient's address may sign for delivery.

☐ Indirect Signature

If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

One box must be checked.

☒ No☐ Yes

As per attached Shipper's Declaration.

☐ Yes

Shipper's Declaration not required.

☐ Dry Ice

Dry Ice, 9 UN 1845

x kg

☐ Cargo Aircraft Only

Restrictions apply for dangerous goods — see the current FedEx Service Guide

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

Obtain recip.
Acct. No. ☐☒ Sender
Acct. No. in Section
1 will be billed.☐ Recipient☐ Third Party☐ Credit Card☐ Cash/Check

Total Packages

Total Weight

lbs.

Credit Card Auth.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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