



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
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March 21, 2017

Caleb Osbourne
Associate Director – Water Quality
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
Variance Request – AR Code § 8-4-230

Dear Mr. Osborne:

On October 16, 2015 ADEQ issued a modification to NPDES Permit # AR0001210 to Georgia-Pacific Crossett LLC, Crossett Paper Operations (GP) which became effective on October 30, 2015. The modification allowed for the 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. The modified permit contained chemical usage limits for the hydrogen peroxide and organic iron catalyst from the three addition points identified. These usage limits have 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 variance from the odor chemical usage limits specified in Part II. Paragraph 21 of the permit. This request 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 is 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 iron levels in the effluent to date have typically been less than 0.5 mg/L.

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

This variance will not result in any economic advantage to Georgia-Pacific. To the contrary, any additional chemical usage allowed by the variance would result in added costs incurred by Georgia-Pacific.

- 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 provide further benefits to the community.

For the reasons set forth above, Georgia-Pacific respectfully requests that ADEQ grant a 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.

A check in the amount of \$200 has been included to cover the initial processing fee for the variance request. In accordance with AR Code § 8-4-230, we understand that a decision will be issued by ADEQ within 10 days. If you have any questions or need additional information prior to this, please feel free to contact Sarah Ros at (870) 567-8670 or by email at sarah.ross@gapac.com.

Sincerely,



Michael L. Hohnadel
Vice-President of Manufacturing
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: 22MAR17
 ACTWGT: 0.50 LB
 CAD: 102787395/NET3850

BILL SENDER

TO **CALEB OSBOURNE-WATER QUALITY**
ADEQ
5301 NORTSHORE DR

NORTH LITTLE ROCK AR 72118

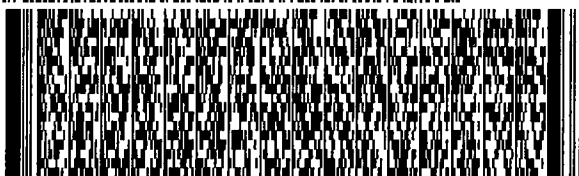
(501) 682-0998

REF: VARIANCE REQUEST

INV:

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DEPT:



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