



Georgia Pacific
Wood Products, LLC

Structural Panels Division
P.O. Box 1095
Fordyce, AR 71742
(870) 352-7252 Telephone
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13114

CERTIFIED MAIL RETURN RECEIPT REQUESTED: 7007 1490 0001 9007 4261

JAN 2 2009

MR

December 29, 2008

Ms. Amanda Gallagher
Arkansas Department of Environmental Quality (ADEQ)
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Georgia-Pacific Wood Products LLC – Fordyce, Arkansas OSB Plant
AFIN 07-00212; Industrial General Storm Water Permit No. ARR00C197
Emergency Fire Fighting Water

Dear Ms. Gallagher:

Georgia-Pacific Wood Products LLC, Fordyce Arkansas OSB Plant had a fire on December 10, 2008, inside the manufacturing building in the vicinity of the Dryer and Blending operation area. On December 11, 2008, Mark Ruppel contacted you via telephone to provide information about the fire. Emergency fire fighting activities resulted in the accumulation of approximately 75,000 gallons of water. The fire fighting water was generated inside the building and was diverted to the press pit, and then diverted to a sedimentation basin located on the north side of the facility. The sedimentation basin had sufficient capacity to contain the fire fighting water. The gate on the outlet of the sedimentation basin was closed before the fire fighting water was routed to the basin to prevent discharge of the water.

Although some fire fighting water may be lost due to evaporation, Georgia-Pacific anticipates that future storm events could occur that would result in the need to discharge the emergency fire fighting water from the sedimentation basin. The discharge of fire fighting water is authorized by the general permit (ARR000000, Part I.B.1.a.i) if appropriate best management practices (BMPs) are implemented. In this case, the sedimentation basin is the BMP that provides a mechanism to reduce total suspended solids, allows for evaporation of volatile constituents, and enables visual observation of the water prior to discharge for floating solids and/or oil & grease (*i.e.*, sheen). Georgia-Pacific previously received written authorization from ADEQ (letter dated August 15, 2008) that indicated that discharge of emergency fire fighting water is allowed per Section B.1.a.i of Part I of the General Industrial Storm Water Permit ARR000000. The fire fighting water generated in December 2008 is similar to the water generated on August 4, 2008.

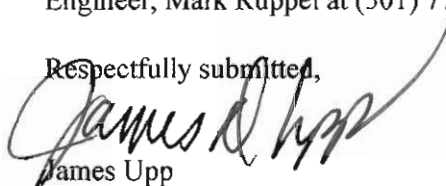
A sample of the water was collected on December 17, 2008 and analyzed for oil & grease, total suspended solids, chemical oxygen demand (COD), pH, formaldehyde, and phenol. This list of constituents is based on our review of the Material Safety Data Sheets for the resins used in the OSB manufacturing process. Results of the analytical analyses are provided in the attached laboratory report.

On December 23, 2008, Mark Ruppel contacted you via telephone to provide information regarding the results of the laboratory analysis of the fire fighting water. Due to the COD level in the sample, Georgia-Pacific intends to hold the water in the sedimentation basin unless rain events cause the sedimentation

basin to exceed capacity, and in that case only the overflow of the sedimentation basin will be discharged. Prior to discharge, Georgia-Pacific will visually inspect the water for floating debris and visible signs of oil & grease (i.e., sheen). An additional sample is scheduled to be collected during the week of December 28, 2008 and submitted to the laboratory for COD analysis. If analytical results indicate that the COD levels are lower, the gate on the sedimentation basin will be opened to discharge the water.

Georgia-Pacific appreciates your assistance on this issue. If you have any questions, please feel free to call our Environmental Coordinator, Dewayne Henry at (870) 352-7252 or our Regional Environmental Engineer, Mark Ruppel at (501) 771-0104.

Respectfully submitted,



James Upp
Plant Manager

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
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Control Number: 0812010330
 Customer Name : GEORGIA PACIFIC OSB FAC, SPECIAL
 Customer Number : 2143
 Report Date : 12/19/08

Sample Date : 12/17/08
 Sample Time : 1405
 Sample Type : GRAB WATER
 Sample From : FIRE FIGHTING WATER

Collected By: MARK RUPPEL
 Delivery By : MR
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance					
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision	Accuracy	Recovery
12/18	1230 NTR	Chemical Oxygen Demand	231.0 mg/L			EPA 410.A	1.02		97.1
12/18	1655 NTR	Oil & Grease, Total	2.700 mg/L			RPA 1664 A	5.65		94.7 *
12/17	1400 DH	pH	7.0 S.U.			SM 18 4500 H+B			
12/18	1300 NTR	Phenolics	0.18 mg/L			RPA 420.1	1.58		94.9
12/18	1425 NTR	Solids, Total Suspended	36.00 mg/L			SM 18Ch 2540 D	0.00		N/A *
12/18	1410 NTR	Formaldehyde	< 0.500 mg/L				0.00		100.0

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Mark Ruppel
 Environmental Services Co., Inc.