From: Leathers, James
To: Osbourne, Margaret
Subject: Re: Georgia Pacific Crossett
Date: Thursday, April 10, 2014 8:51:00 AM
Attachments: 4-10-14 GP Bullets-Permit Limits and Requirements.docx

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Hi Margaret,

Attached is the updated bullets reflecting the HPV status. I spoke with Katia Gray, the Air Enforcement Program Coordinator, who is under Mike Porta the Air Division assistant chief, and requested an email with any pertinent enforcement history or updates. A document in preparation for the upcoming community meeting is being reviewed by Mike Porta and Air Division Chief Mike Bates. She said she would share with me if it was ok with her management, but also mentioned that the communication from her upper management might go directly to our management. I have not received anything yet. Below is the content in the attachment. Let me know if you want me to check in with them again today. Thanks

Permit No. : 0597-AOP-R14
Permit Limits and Requirements:
As of the most recent State conducted FCE on 8/12/13, the following specific compliance issues were identified. After an initial HPV determination was made by the inspector, further review by the ADEQ Enforcement section determined that the facility did not meet HPV status. The decision that the facility does not meet HPV criteria has been documented by ADEQ management.

- Facility is not maintaining records for Specific Conditions 17-19 for 10A boiler (identified as SN-03). These are the records for RDF (Refuse Derived Fuel) or BDT (Bone Dry Ton) sludge burned.
- Facility is not maintaining records for Specific Conditions 48-51 for 9A boiler (identified as SN-22). These are the records for RDF, BDT sludge, or used oil absorbent material burned.
- The facility is failing to demonstrate compliance with Plantwide Condition 21, submittal of a semiannual compliance report.
- The facility is failing to demonstrate compliance with General Provision 7 of their current air permit, failure to demonstrate compliance with required submittal of monitoring reports every six months.
- During the inspection, the following was noted:
- 3 storage silos at the Extruder Plant (2 polyethylene beads and 1 calcium carbonate beads) for coating at SN-71 and SN-72 were not identified in their current air permit.

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