From: Gray, Katia
To: Leathers, James
Cc: Porta, Mike
Subject: RE: FCE for Georgia Pacific Paper Operations
Date: Tuesday, April 22, 2014 3:02:08 PM
Attachments: removed.txt

James,

In addition to the documents I just e-mailed you, I will try to answer your questions to the best of my ability:

1. Try to find out if the facility is monitoring and keeping records as required. From the inspection summary, it appears that most of the recordkeeping is being done at the facility, with the exception of fuel records for boilers 9A and 10A. Since we couldn't find any copies of reporting of monitoring in our Regional office, we wanted to check if they are being submitted to the state (our phone conversation yesterday). Please email what you can.

   The facility addressed the recordkeeping issues noted at the time of the inspection in their response. They have updated their recordkeeping system to allow for better tracking and attached a copy of the updated records. I also forwarded you the facility's most recent SAM and ACC.

2. Try to find details regarding the NSPS and MACT violations. That is the reason for requesting the FCE, or any other enforcement info that you might have to inform my management about the violations.

   As per our conversation this morning, I am not sure why the facility is shown to be out of compliance on the AFS website. I checked with Eva, who inputs all of our AFS information, and we have them as being in compliance on our end. The last time she went in and made any changes to the facility information was June 2012, the current out of compliance info was auto generated on 04/20/2014. I am not sure where the auto generated info comes from. There should be no enforcement issues associated with the most recent inspection since this did not proceed through formal enforcement.

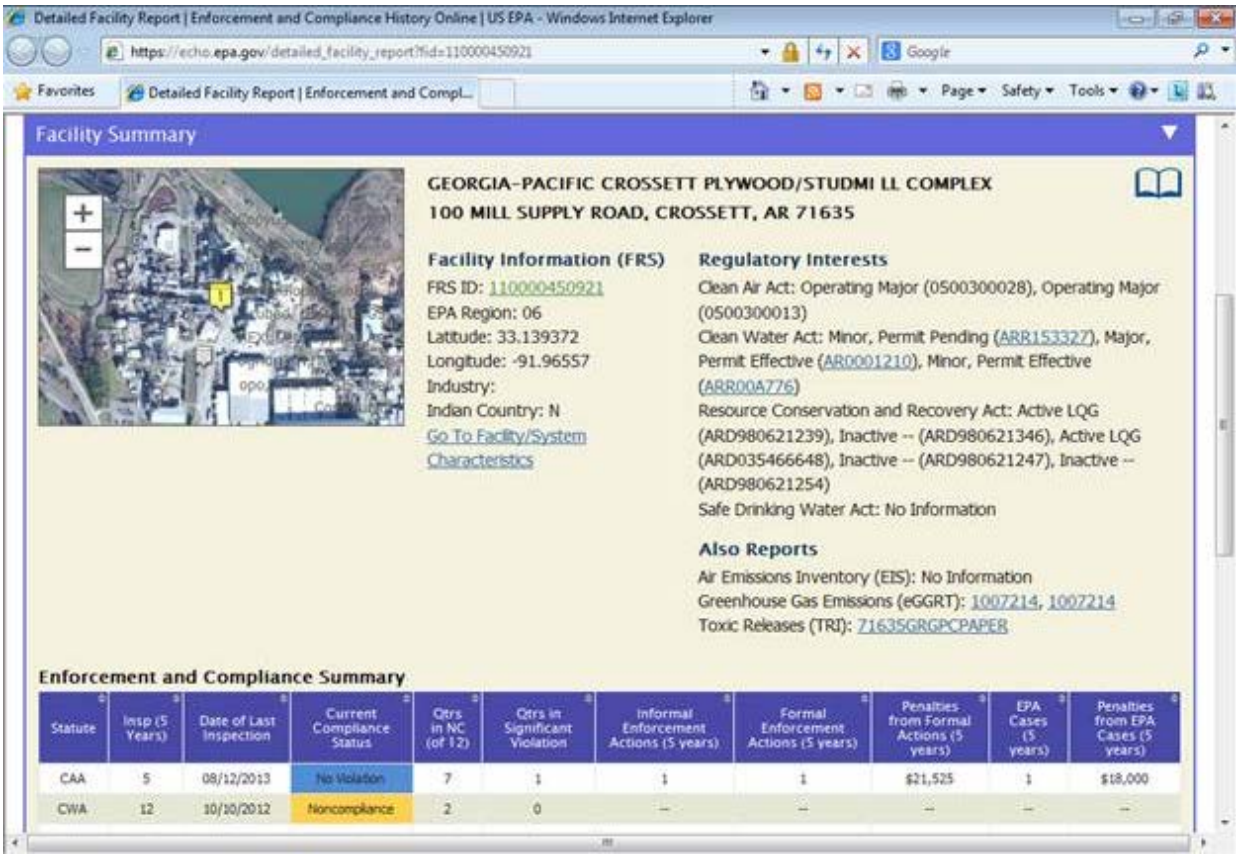
Katia Gray

From: Leathers, James [mailto:Leathers.James@epa.gov]
Sent: Tuesday, April 22, 2014 8:49 AM
To: Gray, Katia
Subject: Re: FCE for Georgia Pacific Paper Operations

Good morning Katia,

Unfortunately, I have one additional favor to ask, would it be possible to get a copy of the FCE for Georgia Pacific Paper Operations? AFIN 02-00013 and Permit Number 0597-AOP-R14.

From the screen capture below, looking at the Detailed Facility Report, the current compliance status shows no violation. However for one of the Facilities tied to the FRS, the Paper Operations (AFS 0500300013), it appears that there are violations.



Detailed Facility Report | Enforcement and Compliance History Online | US EPA - Windows Internet Explorer

https://echo.epa.gov/detailed_facility_report?fid=110000450921

Favorites | Detailed Facility Report | Enforcement and Compl... | Page | Safety | Tools

Facility Summary

GEORGIA-PACIFIC CROSSETT PLYWOOD/STUDMI LL COMPLEX
100 MILL SUPPLY ROAD, CROSSETT, AR 71635

Facility Information (FRS)

FRS ID: 110000450921
EPA Region: 06
Latitude: 33.139372
Longitude: -91.96557
Industry:
Indian Country: N
Go To Facility/System Characteristics

Regulatory Interests

Clean Air Act: Operating Major (0500300028), Operating Major (0500300013)
Clean Water Act: Minor, Permit Pending (ARR153327), Major, Permit Effective (AR0001210), Minor, Permit Effective (ARR00A776)
Resource Conservation and Recovery Act: Active LQG (ARD980621239), Inactive -- (ARD980621346), Active LQG (ARD035466648), Inactive -- (ARD980621247), Inactive -- (ARD980621254)
Safe Drinking Water Act: No Information

Also Reports

Air Emissions Inventory (EIS): No Information
Greenhouse Gas Emissions (eGGRT): 1007214, 1007214
Toxic Releases (TRI): 71635GRGPCPAPER

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Current Compliance Status	Qtrs in NC (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	5	08/12/2013	No Violation	7	1	1	1	$21,525	1	$18,000
CWA	12	10/10/2012	Noncompliance	2	0	--	--	--	--	--

AFS Search Results | Envirofacts | US EPA - Windows Internet Explorer

http://iaspub.epa.gov/enviro/afs_reports.detail_plt_view?p_state_county_compliance_src=0500300013

Favorites | AFS Search Results | Envirofacts | US EPA

AFS

Plant Information

GEORGIA PACIFIC CROSSETT PAPER OPERATION
100 PAPER MILL ROAD
CROSSETT, AR 71635
EPA Plant ID: 110000450921

Operating Status:	O	HPV Flag:	
Operating Status Description:	OPERATING	State Registration Number:	0200013
State County Compliance Source:	0500300013	Government Facility Code Description:	PRIVATELY OWNED/OPERATED
Region Code:	06	Class Code:	A
Primary SIC Code:	2611	Class Code Description:	ACTUAL OR POTENTIAL EMISS
Primary SIC Description:	PULP MILLS	Compliance Status:	W
NAICS Code:	322110	Compliance Status Description:	IN VIOLATION WITH REGARD
NAICS Code Description:	Pulp Mills	Date Plant Information Last Updated:	12/11/2013

AFS Links

- Overview
- Search
- Model
- Law
- AFS Search User Guide
- Contact Us
- AFS Home

Report an Error

Links for This Facility

- Air Facility System
- EnviroMapper for Envirofacts
- MyEnvironment
- Facility Registry System
- Enforcement and Compliance History

AFS Search Results | Envirofacts | US EPA - Windows Internet Explorer

http://iaspub.epa.gov/enviro/afs_reports.detail_plt_view?p_state_county_compliance_src=0500300013

Favorites | AFS Search Results | Envirofacts | US EPA

Air Program Information

Air Program Code	Air Program Description	Air Program Status	Air Program Status Description	Air Program Subpart	Air Program Subpart Description	Class Code	Class Code Description	Compliance Status	Compliance Status Description
0	SIP	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	W	IN VIOLATION WITH REGARD
6	PSD	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	C	IN COMPLIANCE WITH PROCED
8	NESHAP	X	PERMANENTLY CLOSED	M	ASBESTOS	A	ACTUAL OR POTENTIAL EMISS	C	IN COMPLIANCE WITH PROCED
9	NSPS	O	OPERATING	KB	VOLATILE LIQ/PETRO STORAGE VESSEL 7/23/84	A	ACTUAL OR POTENTIAL EMISS	W	IN VIOLATION WITH REGARD
9	NSPS	O	OPERATING	IIII	DIESEL ENGINES COMPRESSION COMBUSTION ENGINES	A	ACTUAL OR POTENTIAL EMISS	W	IN VIOLATION WITH REGARD
9	NSPS	O	OPERATING	BB	KRAFT PULP MILLS	A	ACTUAL OR POTENTIAL EMISS	W	IN VIOLATION WITH REGARD

It looks like NSPS KB, IIII, BB, D; MACT ZZZZ, MM,S; Title V violations, reported by the state.

What is confusing to me is that I'm not sure that these are the violations referenced in the inspection summary (attached).

So I have been asked to do two things (the second is the new request).

1. Try to find out if the facility is monitoring and keeping records as required. From the inspection summary, it appears that most of the recordkeeping is being done at the facility, with the exception of fuel records for boilers 9A and 10A. Since we couldn't find any copies of reporting of monitoring in our Regional office, we wanted to check if they are being submitted to the state (our phone conversation yesterday). Please email what you can.
2. Try to find details regarding the NSPS and MACT violations. That is the reason for requesting the FCE, or any other enforcement info that you might have to inform my management about the violations.

Again, I hate to keep asking for favors, but any help or clarification you can provide is greatly appreciated. Please give me a call at (972) 215-6674 if you have any questions. Thanks!!

Best regards,

James Leathers
U.S. EPA, Region 6
Environmental Engineer
(214) 665-6569
leathers.james@epa.gov

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