From: Allen, Toni
To: Wakeland, Morton
Cc: Leathers, James
Subject: FW: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)
Date: Thursday, February 27, 2014 10:55:40 AM
Attachments: Georgia_Pacific_Crossett_AR.docx

Mort,

Margaret reached out to you concerning TRI data. The most recent TRI data in ECHO for Georgia Pacific is 2011 data and I don't see H2S reported. Margaret Osbourne asked that I obtain the Title V permits from ADEQ on GP facilities in Crossett – the plywood plant, the pulp/paper plant, and a chemical plant that makes resins, I believe. James Leathers in the Toxics Enforcement Section of 6EN is working on this on reviewing the Title V permits (I'll work on reviewing a permit tomorrow). But we're not entirely sure what we should be looking for in the Title V permits to compare against the TRI data. Can James call you today and discuss the most current TRI data available, as well as how the released toxics compare to what's permitted in the Title V permits In ECHO, two facilities are linked together under FRS 110000450921 – the pulp/paper plant and the chemical plant

We are trying to get information for Sam Coleman. He attended a community meeting in Crossett, AR this past Saturday, with Israel Anderson of our EJ office. Maria Martinez told Sam about the high H2S numbers.

Thanks,
Toni

Toni Allen
CAA Region 6 State/Local Oversight Coordinator/Air Branch (6EN-AT)
EPA Compliance Assurance & Enforcement Division
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Phone: 214.665.7271
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From: Martinez, Maria
Sent: Monday, February 24, 2014 2:19 PM
To: Allen, Toni; Osbourne, Margaret
Subject: RE: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)

We are familiar with the monitoring site which is monitoring for PM2.5. Have you folks checked TRI? You might want to take a look at it…especially the H2S numbers which seem to be comprised mostly of fugitive emissions?

From: Osbourne, Margaret
Sent: Monday, February 24, 2014 1:23 PM
To: Martinez, Maria
Cc: Allen, Toni
Subject: FW: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)

Hi Maria:

See the work Toni Allen did below when asked to look into compliance and enforcement activities in the Crossett area last week.

Thanks,
Margaret

Margaret Osbourne
Chief, Air Toxics Section
Compliance Assurance & Enforcement Division
EPA Region 6
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From: Allen, Toni
Sent: Wednesday, February 19, 2014 2:28 PM
To: Anderson, Israel
Cc: Overbay, Connie; Ahuja, Anupa; Osbourne, Margaret
Subject: RE: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)

Israel, ADEQ enforcement confirmed there are no current enforcement actions for any of the Georgia Pacific Crossett facilities which have a Title V Permit and AFS number (no comment for the GP Log Yard). Please let me know if you need anything further.

Toni

From: Anderson, Israel
Sent: Wednesday, February 19, 2014 2:13 PM

To: Allen, Toni
Cc: Overbay, Connie; Ahuja, Anupa; Osbourne, Margaret
Subject: RE: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)

Thanks Toni.

From: Allen, Toni
Sent: Wednesday, February 19, 2014 1:13 PM
To: Anderson, Israel
Cc: Overbay, Connie; Ahuja, Anupa; Osbourne, Margaret
Subject: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)

Good afternoon Israel,

I've reached out to ADEQ for input on the facilities. I haven't heard back yet from them about any pending enforcement actions and/or recent CAA FCEs. I've asked about air monitors at/near the facilities also. I just received an email from a contact in the Compliance Monitoring Branch who said she'd research the matter and get back to me ASAP. I've also contacted Tony Davis in ADEQ's Air Planning & Air Quality Analysis Branch but had to leave him a message.

I did browse AFS though, The GP Log Yard isn't in AFS so I have no comment on that facility. The GP Plywood Stud Crossett facility (0500300005) is a Title V Major, all air programs are currently in compliance, and the last CAA FCE was 7/16/13. The GP Plywood Studmill Complex Crossett in ECHO links two facilities with different AFS numbers, as well as unique NAICS codes. GP Crossett Paper Operation is a pulp mill (0500300013); NAICS 322110 Pulp Mills. It's in compliance and the last FCE was 8/12/13. The other facility, GP Chemical (0500300028) has a NAICS Code of 325211 Plastics Materials and Resin. All air programs are currently in compliance and the last FCE was 11/17/11. I haven't checked the Compliance Monitoring Plan ADEQ submitted for FY2014 (it would be enforcement sensitive) [redacted] (b) (5) [redacted]. ADEQ does an FCE at every Title V major every other year.

I'll let you know if ADEQ reports any pending enforcement. I just spoke to ADEQ a week ago today for the monthly call and they didn't mention anything about GP Crossett being in the works.

Toni

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