Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.



Walter Wright, Jr. wwright@mwlaw.com (501) 688.8839

Air Enforcement: Arkansas Department of Environmental Quality and Ashley County, Arkansas Kraft Paper Mill Enter into Consent Administrative Order

05/19/2017

The Arkansas Department of Environmental Quality ("ADEQ") and Georgia-Pacific Crossett LLC ("GP") entered into an April 26th Consent Administrative Order ("CAO") addressing alleged air permit violations. See LIS No. 17-030.

GP is stated to own and operate a kraft paper mill in Crossett, Arkansas.

An Air Operating Permit ("AOP") as stated to have been issued to GP on February 23, 2016. Stack test results were submitted to ADEQ for emission testing conducted at the Incinerator (SN-83) on April 13, 2016. The facility subsequently submitted a Notification of Compliance on June 13, 2016 pursuant to 40 C.F.R. 63.9(h).

The company addressed the emission testing conducted on April 13, 2016 stating that:

The emission testing was conducted under two (2) operating scenarios (Scenario 1 and Scenario 2) to determine the minimum SN-83 operating temperature that would comply with the nitrogen oxides, carbon monoxide (CO), sulfur dioxide, and volatile organic compounds pound per hour (lb/hr) permit limits as well as the methanol outlet concentration requirement.

The CAO provides that during emission testing under Scenario 1 results indicated an average CO emission rate of 6.5 pounds per hour which exceeds the permitted CO emission rate of 6.0 lbs/hr as established in the air permit. This is alleged to violate the facility's air permit.

GP responded in the Notification of Compliance that upon discovery of the CO exceedance under Scenario 1, testing at a higher incinerator temperature under Scenario 2 "began which demonstrated compliance with the permitted CO limits of the Permit." Based upon the results of Scenario 2, GP is stated to have adopted a minimum temperature of 1621° F as its operating set point to ensure compliance with all applicable incinerator permit limits.

ADEQ subsequently approved the continuous monitoring system parameters outlined in the June 13, 2016 correspondence.

A civil penalty of \$1,400 is assessed.

A copy of the CAO can be downloaded here.

