Georgia-Pacific
Consumer Products LP

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Ronnie D. Hall
Vice President, Naheola Operations

November 8, 2016

Mr. Scott Ramsey, Chief
Industrial Section- Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130

RE: **Draft Permit**
NPDES Permit Number: AL0003301

Dear Mr. Ramsey,

Georgia-Pacific Consumer Products LP (GP) appreciates the opportunity to review and provide comments on the draft NPDES permit AL0003301 dated October 11, 2016. Enclosed are GP's comments on the draft permit and the ADEM Permit Rationale, organized by page number and topic.

1. Permittee Name: Georgia Pacific Consumer Products should be changed to official legal entity Georgia-Pacific Consumer Products LP.
2. Table of Contents: Part IV.F, G and H need to be updated to reflect these sections of the permit.
3. Page 1. Part I.A- the DSN0011 discharge description does not include the landfill leachate as a treated constituent. The form 2C included in the permit application and the current AL0003301 permit both include landfill leachate as a treated constituent. GP respectfully requests that ADEM include landfill leachate in the DSN001 discharge descriptions both in the permit and permit rationale.
4. Page 1. Part I.A- The BOD5 monthly average and daily maximum limitations for June-September are listed as 0 lbs/day. GP respectfully requests that the statement "See footnote 6/" be used in lieu of the 0 lbs/day.
5. Page 7. DSN001S sample type- sample type is listed as a composite. GP respectfully requests that all composite sample types listed in the permit include whether the composite sample should be a 24 Hour or 8 Hour composite.
6. Page 9. Footnote 6/ lists Part IV.G and should be changed to IV.H (Method Limits) to reflect to the correct section.
7. Page 9. Part I.A- Footnotes 4/ and 5/ discuss the production tiers for AOX limitations. To simplify the footnotes, GP respectfully requests that footnote 4/ be changed to "These limitations will apply when the total bleach plant production is

less than 1785 air-dried metric tons (unbleached) per day as a monthly average" and footnote 5/ be changed to "These limitations will apply when the total bleach plant production is greater than or equal to 1785 air-dried metric tons (unbleached) per day as a monthly average".

8. Page 11. Part I.A- Settable Solids and Turbidity Footnotes- the current permit includes a footnote for the parameters (settable solids and turbidity) for DSN002 and DSN001C stating "To be monitored only when construction activities are occurring". The draft permit does not include this footnote for the discharge point DSN002, but it includes the footnote (5/) with discharge point DSN001C on page 23. GP respectfully requests that ADEM include the footnote 5 regarding settable solids and turbidity on page 11.
9. Page 11,12,13,14,23,24,25 – Footnote 1 on these pages indicates that samples must be collected "after final treatment"; however, these are stormwater outfalls and discharges do not require or receive treatment. Additionally, these outfalls require grab, not composite samples. Since these footnotes are not applicable to stormwater discharges, we respectfully request Footnote 1 be deleted on each page.
10. Page 16. Part 1.A - Footnotes 6/ and 7/ discuss the production tiers for chloroform limitations. To simplify the footnotes, GP respectfully requests that footnote 6/ be changed to "These limitations will apply when the A-line bleach plant production is less than 1100 air-dried metric tons (unbleached) per day as a monthly average" and footnote 7/ be changed to "These limitations will apply when the A-line bleach plant production is greater than or equal to 1100 air-dried metric tons (unbleached) per day as a monthly average".
11. Pages 18 and 22. GP respectfully requests that the discharge limitation "TCDD equivalents" should be listed as "2,3,7,8-TCDD" to match the effluent guidelines of 40 CFR 430.
12. Page 20. Part 1.A - Footnotes 6/ and 7/ discuss the production tiers for chloroform limitations. To simplify the footnotes, GP respectfully requests that footnote 6/ be changed to "These limitations will apply when the B-line bleach plant production is less than 685 air-dried metric tons (unbleached) per day as a monthly average" and footnote 7/ be changed to "These limitations will apply when the B-line bleach plant production is greater than or equal to 685 air-dried metric tons (unbleached) per day as a monthly average".
13. Page 20. Part 1.A - Footnotes 6/ and 7/ next to the chloroform limitations are in reverse order and should be changed to match the limitation to the applicable production tier.
14. Pages 15-22 Part I.A- These pages cover GP's two internal discharges (001A and 001B) and include the narrative limitation "The discharge shall have no sheen, and there shall be no discharges visible oil, floating solids or visible foam other than trace amounts" and footnote 3/. This narrative limitation and footnote 3/ are already listed in the permit under the DSN001 discharge, which receives the 001A and 001B discharges after wastewater treatment. GP believes this language is not necessary for an internal outfall that does not discharge directly to a receiving stream and in an effort to simplify, requests that the narrative limitation and footnote 3/ be removed from pages 15-22 of the permit.
15. Page 26, Part I.B.2.a – GP requests the last phrase be modified to read "; however, should EPA and ADEM approve a method with a lower minimum level

during the term of this permit the permittee shall use the newly approved method" to recognize ADEM's authority to approve any such new methods.

16. Page 27. Part I.C.1.b- The correct selection needs to be made for "Reports more frequently than monthly and monthly testing should be submitted on a [monthly] basis".
17. Page 43. Part IV.B.1.b.- Storms may occur on this site that exceed 0.1 inches yet do not produce a discharge. Thus, for example, the site could experience a rain event on one day exceeding 0.1 inches and no discharge is produced. On the following day, a discharge could be produced after a much larger event. However, the 72 hour criteria in this condition would unnecessarily preclude the sampling of this discharge. Thus, we suggest the language be changed to "The duration between the storm event sampled and the end of the previous measurable (greater than 0.1-inch rainfall) storm event **producing a discharge** must be a minimum of 72 hours" to apply the 72-hour minimum to actual discharges rather than only rainfall amount.
18. Page 44. Part IV.C.1.c (1). GP would like to clarify when the 48-hour time frame begins in this reporting requirement. GP respectfully requests that this requirement be changed as follows: "In the event toxicity has been demonstrated, the permittee shall notify the Department in writing within 48 hours of receipt of the full toxicity report from the laboratory".
19. Page 51. Part IV.D.10.a- GP believes that this language is obsolete and respectfully requests that the statement "The mill must achieve compliance with the BMP requirements upon the permit effective date" be used instead.
20. Page 52. Part IV.F.- GP is called the "Pennington mill" in this section of the permit. While the mill is located in Pennington, AL, GP request that "the permittee" be used in lieu of the "Pennington mill" to prevent confusion.
21. Page 53. Test methods and minimum level- During review, GP noted that the test methods and applicable minimum levels were out of order at the bottom of the table. It is likely that this is a formatting issue and will require the table to be reformatted to match the test method with the correct minimum level.
22. Page 1. Permit Rationale- GP believes that the discussion regarding ADEM Administrative rule 335-6-10-.12 should include a statement saying that the facility's discharge is not to a Tier II water body, and that there has been no new or expanded discharge.
23. Page 8. Permit Rationale- The BOD5 discussion at the bottom of the page includes the reduced summer permit season (June 1 to September 30) that has been discussed with ADEM water quality. GP respectfully requests that the same statement that was used on page 11 of the rationale (river monitoring) that acknowledges the discussion with the water quality group be placed in the BOD5 discussion on page 8 as well.

GP appreciates your consideration of these comments/requests regarding draft NPDES permit AL0003301 and the Permit Rationale. If you have any questions or require clarification, please contact Daniel Hall at (205) 459-1123.

Sincerely,

Ronnie D. Hall
Vice President, Naheola Operations

Chavers, Alexander

From: Chavers, Alexander
Sent: Thursday, November 17, 2016 10:45 AM
To: 'Hall, Daniel A'
Subject: RE: GP Draft Permit Comment Response

Daniel,

I just realized but #5 was actually fixed in the draft to specify 24-hour composite like all of the other composite samples for that outfall. The written response for #5 should not be considered.

From: Hall, Daniel A [mailto:Daniel.Hall@GAPAC.com]
Sent: Thursday, November 17, 2016 10:42 AM
To: Chavers, Alexander
Subject: RE: GP Draft Permit Comment Response

Thanks. We will take a look and get back with you.

From: Chavers, Alexander [mailto:adchavers@adem.alabama.gov]
Sent: Thursday, November 17, 2016 10:13 AM
To: Hall, Daniel A <Daniel.Hall@GAPAC.com>
Subject: GP Draft Permit Comment Response

Sent by an external sender

Daniel,

Below is the Department's response to the draft permit comments.

1. The permittee name has been changed throughout the permit documents and in our database to reflect Georgia-Pacific Consumer Products LP as the legal entity.
2. The table of contents was updated to reflect the correct sections in Part IV of the permit.
3. Landfill leachate has been included in the description for DSN001 throughout the permit and rationale.
4. 0 lbs/day will not be replaced by "See Footnote 6/" as it was in the previous permit. These limits pages should reflect what is on the summary DMR; however, we can include the reference "6/" to the footnote alongside 0 lbs/day to improve visibility of the footnote. This change has been made in the attached permit.
5. The Department does not specify whether these details bout
6. Part IV.G changed to Part IV.H in Footnote 6/
7. Footnotes 4/ and 5/ were simplified using the suggested language.
8. Footnote 5/ was added to Page 11 regarding Settleable Solids and Turbidity.
9. Footnote 1/ is a standard footnote for all outfalls. The conditions of Footnote 1/ still applies to stormwater outfalls. The sample should be collected just prior to discharge and after final treatment. Since there is no "treatment" of stormwater, the location is only required to be just prior to discharge and because the samples are grab, the composite sample language simply doesn't apply.
   We can discuss this further if we need to.
10. Footnotes 6/ and 7/ were simplified using the suggested language.
11. TCDD Equivalents was switched for 2,3,7,8 Tetrachlorodibenzo-P-Dioxin on outfalls (01AS and 01BS).
    Note: Due to the ICIS parameter code, the parameter is now listed on Pages 17 and 21.
12. Footnotes 6/ and 7/ were simplified using the suggested language.

13. Footnotes 6/ and 7/ references were reversed to match the production tiers.
14. Narrative criteria was removed from internal outfalls as it does not apply and footnote 3/ was removed as these outfalls discharge to DSN001 which includes this footnote.
15. While ADEM can approve the use of a method following EPA approval of that method, ADEM does not approve the actual methods, only EPA does; therefore, it would not be correct to include ADEM in this language.
16. While this section is normally finalized during the permit issuance, [monthly] is the appropriate selection.
17. As we discussed in the meeting, only a storm event greater than 0.1 inches and producing a discharge is considered a qualifying rain event. If a discharge does not occur from a storm event that is greater than 0.1 inches, it is not a qualifying event and the 72 hour criteria is not initiated. No change to Part IV.B will be made based on this comment.
18. The 48-hour timeframe begins once the permittee is in possession of the final toxicity results.
19. This language is derived directly from 40 CFR 430.03 and the requested language is included as part of this language; therefore no changes will be made.
20. The Pennington mill was changed to "the permittee".
21. Part IV.H was corrected to show the correct Minimum Level for each parameter.
22. Page 1 of the rationale already includes a statement saying that the permit applied for is not for a discharge to a Tier II water body. Because this discharge is not a Tier II water body, the new or expanded criteria does not apply; therefore, it would not be necessary to specify that.
23. An asterisk was placed by the header and a note describing the time period change was included in the rationale.

Please review the responses and the changes, or lack thereof. If you would like to discuss, please feel free to give me a call.

Alexander Chavers

Industrial Section

Phone: (334) 271-7851

Email: adchavers@adem.alabama.gov

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Alabama Department of Environmental Management

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Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE: GEORGIA-PACIFIC CONSUMER PRODUCTS LP

FACILITY LOCATION: 7530 HIGHWAY 114
PENNINGTON, AL 36916

PERMIT NUMBER: AL0003301

RECEIVING WATERS: DSN001-003: TOMBIGBEE RIVER

In accordance with and subject to the provisions of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §§1251-1388 (the "FWPCA"), the Alabama Water Pollution Control Act, as amended, ***Code of Alabama 1975****, §§ 22-22-1 to 22-22-14 (the "AWPCA"), the Alabama Environmental Management Act, as amended,* ***Code of Alabama 1975****, §§22-22A-1 to 22-22A-17, and rules and regulations adopted thereunder, and subject further to the terms and conditions set forth in this permit, the Permittee is hereby authorized to discharge into the above-named receiving waters.*

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

Draft

Alabama Department of Environmental Management

INDUSTRIAL SECTION
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

TABLE OF CONTENTS

PART I DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN001I: Treated process wastewater, sanitary wastewater, landfill leachate and storm water runoff associated with the production of pulp and paper 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
BOD, 5-Day (20 Deg. C) 5/	23574 lbs/day	45318 lbs/day	-	-	-	5X Weekly	24-Hr Composite	-
Net BOD, 5-Day (20 Deg. C) 6/	0 lbs/day See Footnote 6	0 lbs/day See Footnote 6	-	-	-	5X Weekly	24-Hr Composite	June - September
pH	-	-	6.0 S.U.	-	9.0 S.U.	5X Weekly	Grab	-
Solids, Total Suspended	43098 lbs/day	80166 lbs/day	-	-	-	5X Weekly	24-Hr Composite	-
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

5/ See Note 1 on Page 2.

6/ See Note 2 on Page 2.

Note 1: For determining compliance with the effluent guideline limitations, the permittee will report the **actual** BOD_5 discharged

Note 2: For determining compliance with the allocation table found on Pages 3-6 of this permit, the permittee will use the following equations:

***For the period June 1 through September 30 beginning on the effective date of this permit and lasting through the expiration date of this permit, or until such time as an alternate real time monitoring program described in Part IV.F has been approved by ADEM[1]**

$$Daily\ Maximum\ BOD_5(reported)^* = Net\ BOD5 - Daily\ Maximum\ Allocation^*1.92$$

$$Monthly\ Average\ BOD_5(reported)^* = Net\ BOD5 - Monthly\ Average.\ Allocation$$

*Values less than zero are considered to be in compliance.

Daily Maximum Allocation[1/] – This value is determined from the tables for each day. The table defines the allocation for specified river flow and temperature combinations. Average flow on the previous day shall be determined using the average daily discharge from the previous day as reported at USGS Gage 02467000 located at the Demopolis Lock and Dam. The temperature of the Tombigbee River shall be determined using the daily average temperature from the previous day as reported at USGS Gage 02469525 located at Highway 114 (River Mile 173.4) for the period or from the West Rock Mill Company, LLC. (formerly Rock-Tenn Co.) water intake structure.

If either reading is not available, the reading for the previous day will be used. On those days when the actual temperature or flow does not appear on the chart, the permittee shall use the next higher temperature and next lower flow. On those days when the temperature is greater than 32 °C and/or the flow is less than 900 cfs, the allowable allocation will be 1,532 lbs/day BOD5 and the facility must conduct a river monitoring run to verify that the dissolved oxygen is meeting stream water quality standards[1/]. The permittee may rely on data provided by the WestRock Mill Company, LLC. to satisfy the requirement.

Monthly Average Allocation – This value is determined by aggregating the daily maximum allocations for each day and dividing the sum by the number of days in the month.

Net BOD_5 – The **actual** BOD_5 discharged less an offset for oxygen injected into the river. The permittee may offset 1 pound of BOD_5 discharged by injecting 4.2 pounds of oxygen into the river, but the offset may not reduce net BOD_5 discharged below zero on any day. Oxygen injection may occur at the station at the mill and/or McCarty's Landing. Records of oxygen injection, including actual BOD5 discharged and corresponding amount of oxygen added on a daily basis shall be maintained in a spreadsheet at the facility.

1/ If the permittee has implemented an alternate real-time monitoring plan described in Part IV.F of this permit, certain conditions of this section may not apply. Specifically, the daily maximum allocation will be determined using the tiered allocation table found in Part IV.F of this permit in lieu of the tables on Pages 3-6. In addition, a river run will not be required when the temperature is greater than 32 °C and/or the flow is less than 900 cfs.

Daily Average River Temperature (°C)	Daily Average River Flow (CFS)															
	900	925	950	975	1000	1050	1100	1150	1200	1250	1300	1350	1400	1500	1600	1700
15	9765	9765	9765	9765	9765	10256	10766	11286	11797	12313	12827	13340	13853	14851	15150	15502
15.5	9536	9536	9536	9536	9536	10013	10519	11024	11532	12031	12537	13040	13539	14512	14780	15109
16	9314	9314	9314	9314	9314	9783	10277	10774	11266	11757	12253	12745	13234	14187	14428	14725
16.5	9098	9098	9098	9098	9098	9555	10038	10525	11005	11489	11974	12452	12935	13867	14078	14351
17	8883	8883	8883	8883	8883	9332	9807	10281	10752	11228	11698	12171	12641	13548	13734	13984
17.5	8676	8676	8676	8676	8676	9115	9577	10038	10502	10966	11427	11888	12351	13244	13404	13622
16	8470	8470	8470	8470	8470	8896	9353	9807	10260	10711	11165	11612	12068	12935	13070	13269
16.5	8264	8264	8264	8264	8264	8687	9131	9573	10019	10459	10903	11343	11783	12637	12745	12919
19	8063	8063	8063	8063	8063	8477	8911	9344	9779	10213	10642	11078	11506	12340	12428	12577
19.5	7867	7867	7867	7867	7867	8269	8694	9119	9541	9968	10389	10809	11234	12047	12113	12239
20	7671	7671	7671	7671	7671	8063	8481	8896	9309	9721	10135	10547	10963	11757	11797	11902
20.5	7473	7473	7473	7473	7473	7860	8264	8672	9077	9482	9885	10286	10694	11466	11486	11573
21	7283	7283	7283	7283	7283	7656	8051	8449	8844	9241	9633	10028	10427	11178	11178	11241
21.5	7086	7086	7086	7086	7086	7451	7842	8229	8611	9000	9384	9769	10156	10892	10868	10916
22	6890	6890	6890	6890	6890	7250	7626	8006	8382	8756	9131	9508	9885	10603	10558	10576
22.5	6697	6697	6697	6697	6697	7046	7412	7782	8149	8516	8879	9249	9614	10313	10256	10256
23	6501	6501	6501	6501	6501	6838	7199	7557	7911	8269	8627	8983	9340	10019	9939	9929
23.5	6300	6300	6300	6300	6300	6631	6977	7325	7674	8024	8368	8717	9066	9726	9623	9600
24	6097	6097	6097	6097	6097	6418	6756	7096	7434	7769	8110	8445	8778	9424	9309	9266
24.5	5892	5892	5892	5892	5892	6202	6531	6858	7187	7518	7842	8169	8495	9115	8991	8927
25	5681	5681	5681	5681	5681	5981	6300	6617	6934	7250	7569	7885	8202	8802	8656	8590
25.5	5463	5463	5463	5463	5463	5754	6059	6369	6674	6983	7287	7592	7898	8474	8326	8243
26	5241	5241	5241	5241	5241	5524	5819	6111	6410	6701	7002	7293	7587	8142	7979	7885
26.5	5009	5009	5009	5009	5009	5278	5567	5847	6135	6418	6701	6983	7266	7800	7626	7524
27	4770	4770	4770	4770	4770	5029	5301	5573	5847	6119	6384	6656	6934	7440	7262	7152
27.5	4520	4520	4520	4520	4520	4765	5029	5284	5542	5807	6068	6320	6578	7071	6882	6766
26	4258	4258	4258	4258	4258	4492	4739	4990	5229	5482	5720	5965	6217	6674	6484	6360
26.5	3986	3986	3986	3986	3986	4201	4440	4673	4901	5133	5364	5598	5826	6265	6075	5951
29	3692	3692	3692	3692	3692	3899	4118	4339	4552	4770	4990	5207	5423	5833	5643	5518
29.5	3388	3388	3388	3388	3388	3581	3782	3986	4187	4393	4594	4798	5000	5375	5186	5060
30	3064	3064	3064	3064	3064	3238	3424	3612	3798	3986	4173	4355	4545	4892	4716	4586
30.5	2718	2718	2718	2718	2718	2880	3048	3212	3388	3550	3720	3894	4058	4377	4208	4091
31	2349	2349	2349	2349	2349	2489	2642	2789	2948	3093	3246	3396	3540	3822	3676	3560
31.5	1952	1952	1952	1952	1952	2076	2208	2341	2470	2604	2729	2866	2990	3238	3102	3005
32	1532	1532	1532	1532	1532	1636	1745	1849	1965	2069	2185	2289	2404	2604	2489	2422

Daily Average River Temperature (°C)	Daily Average River Flow (CFS)															
	1800	1900	2000	2100	2200	2300	2400	2500	2600	2700	2800	2900	3000	3100	3200	3300
15	15896	16331	16805	17299	17815	18355	18910	19481	20003	20553	21128	21678	22232	22809	23294	23574
15.5	15478	15890	16331	16798	17284	17799	18329	18875	19368	19888	20437	20984	21514	22060	22571	23039
16	15070	15454	15865	16311	16777	17262	17760	18279	18751	19243	19761	20302	20798	21320	21861	22306
16.5	14672	15024	15418	15833	16272	16734	17209	17705	18139	18611	19109	19615	20100	20606	21117	21583
17	14274	14607	14973	15365	15777	16212	16664	17136	17550	17992	18465	18946	19434	19908	20395	20885
17.5	13887	14197	14539	14907	15300	15709	16139	16581	16976	17389	17831	18296	18777	19229	19692	20169
18	13511	13796	14113	14460	14823	15213	15622	16043	16405	16805	17224	17658	18114	18559	19000	19453
18.5	13139	13404	13696	14014	14366	14725	15115	15514	15852	16225	16623	17034	17465	17903	18320	18751
19	12778	13011	13287	13586	13907	14253	14617	14990	15312	15660	16030	16425	16833	17269	17657	18064
19.5	12413	12633	12885	13155	13461	13782	14123	14480	14780	15104	15454	15820	16218	16623	17011	17397
20	12054	12253	12483	12738	13019	13322	13646	13984	14253	14560	14891	15242	15611	15991	16378	16741
20.5	11701	11881	12090	12328	12585	12868	13174	13485	13744	14023	14336	14661	15013	15370	15753	16100
21	11356	11513	11701	11918	12163	12421	12704	13003	13234	13503	13792	14097	14428	14769	15126	15465
21.5	11005	11147	11317	11520	11736	11981	12246	12522	12738	12986	13252	13539	13848	14173	14512	14846
22	10659	10780	10934	11116	11324	11546	11790	12047	12253	12474	12729	12994	13279	13586	13907	14233
22.5	10319	10415	10558	10717	10903	11116	11343	11586	11764	11974	12208	12459	12729	13011	13314	13632
23	9968	10059	10177	10324	10492	10682	10897	11122	11286	11479	11695	11925	12179	12443	12729	13028
23.5	9623	9698	9797	9929	10085	10260	10453	10659	10809	10987	11185	11401	11640	11888	12149	12436
24	9276	9328	9419	9531	9674	9831	10013	10202	10340	10497	10682	10879	11098	11336	11586	11846
24.5	8927	8967	9040	9140	9266	9415	9577	9755	9870	10019	10181	10366	10569	10785	11024	11266
25	8575	8597	8656	8747	8857	8983	9140	9301	9406	9531	9688	9860	10049	10244	10470	10694
25.5	8209	8223	8269	8347	8445	8561	8694	8848	8935	9057	9190	9353	9522	9717	9919	10131
26	7848	7848	7885	7941	8031	8135	8257	8389	8474	8575	8703	8848	9008	9182	9371	9569
26.5	7473	7462	7485	7541	7609	7703	7811	7936	8006	8096	8209	8347	8488	8649	8824	9008
27	7091	7071	7081	7122	7183	7266	7368	7479	7541	7620	7721	7836	7974	8122	8283	8459
27.5	6693	6666	6674	6701	6756	6830	6914	7016	7061	7141	7229	7342	7462	7598	7745	7904
28	6289	6257	6250	6272	6320	6384	6459	6552	6586	6656	6737	6830	6944	7071	7204	7351
28.5	5867	5826	5819	5840	5874	5923	5995	6075	6111	6164	6233	6328	6426	6544	6666	6802
29	5434	5388	5375	5388	5416	5458	5518	5592	5618	5668	5733	5812	5909	6009	6126	6250
29.5	4980	4941	4921	4921	4950	4990	5040	5102	5123	5165	5229	5295	5388	5482	5580	5693
30	4512	4464	4447	4447	4464	4496	4545	4603	4621	4663	4716	4779	4854	4941	5040	5144
30.5	4018	3968	3955	3955	3966	3993	4038	4091	4111	4139	4187	4251	4317	4401	4488	4578
31	3501	3452	3434	3434	3452	3482	3521	3560	3581	3612	3654	3709	3776	3846	3930	4006
31.5	2948	2920	2900	2907	2920	2941	2976	3019	3033	3064	3109	3156	3212	3280	3351	3406
32	2376	2349	2341	2341	2357	2386	2412	2450	2470	2499	2540	2587	2636	2694	2742	2789

Daily Average River Temperature (°C)	Daily Average River Flow (CFS)															
	3400	3600	3800	4000	4300	4600	4900	5100	5400	5700	6000	6500	7000	7500	8000	8500
15	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
15.5	23513	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
16	22757	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
16.5	22012	22933	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
17	21297	22158	23065	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
17.5	20584	21411	22294	23145	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
18	19897	20669	21526	22344	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
18.5	19191	19948	20766	21561	22789	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
19	18490	19247	20018	20798	21963	23119	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
19.5	17799	18550	19283	20048	21150	22269	23362	23574	23574	23574	23574	23574	23574	23574	23574	23574
20	17121	17879	18559	19293	20354	21434	22495	23159	23574	23574	23574	23574	23574	23574	23574	23574
20.5	16459	17186	17855	18550	19567	20616	21619	22269	23267	23574	23574	23574	23574	23574	23574	23574
21	15809	16512	17165	17814	18804	19819	20766	21388	22356	23280	23574	23574	23574	23574	23574	23574
21.5	15161	15845	16486	17100	18048	19008	19918	20532	21445	22331	23280	23574	23574	23574	23574	23574
22	14533	15184	15809	16392	17314	18221	19090	19683	20542	21399	22294	23574	23574	23574	23574	23574
22.5	13916	14522	15137	15697	16581	17435	18278	18830	19663	20489	21320	22868	23574	23574	23574	23574
23	13305	13877	14459	15013	15845	16664	17479	17999	18794	19586	20375	21832	23417	23574	23574	23574
23.5	12704	13244	13800	14336	15126	15908	16692	17179	17935	18689	19433	20809	22319	23574	23574	23574
24	12113	12617	13147	13678	14407	15172	15908	16364	17091	17807	18517	19799	21229	22776	23574	23574
24.5	11520	11996	12506	13003	13696	14428	15126	15575	16259	16933	17603	18812	20158	21643	23240	23574
25	10939	11388	11867	12328	13003	13696	14345	14780	15441	16075	16706	17855	19118	20510	22023	23574
25.5	10351	10774	11234	11667	12313	12986	13586	14003	14617	15219	15820	16889	18081	19395	20831	22368
26	9773	10181	10603	11011	11626	12253	12827	13225	13792	14366	14945	15947	17063	18295	19643	21117
26.5	9207	9577	9978	10361	10951	11532	12076	12452	12986	13530	14082	15001	16050	17209	18481	19877
27	8634	8991	9361	9717	10277	10809	11336	11681	12194	12704	13209	14082	15059	16153	17359	18654
27.5	8076	8403	8740	9073	9605	10100	10592	10916	11388	11874	12359	13155	14062	15104	16232	17450
28	7507	7811	8129	8431	8927	9398	9860	10162	10603	11049	11493	12239	13087	14052	15126	16271
28.5	6944	7214	7518	7787	8250	8694	9123	9398	9813	10234	10637	11336	12134	13019	14023	15104
29	6384	6631	6896	7141	7574	7986	8389	8642	9024	9415	9793	10436	11160	12003	12935	13945
29.5	5819	6038	6281	6509	6896	7277	7656	7885	8250	8604	8944	9541	10202	10967	11846	12802
30 .	5252	5445	5655	5861	6217	6578	6924	7131	7462	7787	8103	8634	9258	9978	10774	11681
36.5	4663	4844	5019	5207	5542	5867	6180	6377	6666	6963	7245	7738	8304	8976	9726	10547
31	4072	4237	4386	4561	4854	5154	5434	5605	5881	6142	6393	6830	7351	7961	8665	9433
31.5	3472	3591	3731	3881	4152	4416	4663	4826	5060	5284	5505	5895	6360	6924	7552	8250
32	2841	2934	3048	3189	3434	3665	3881	4018	4208	4401	4594	4931	5341	5840	6410	7041

Daily Average River Temperature (°C)	Daily Average River Flow (CFS)														
	9000	9500	10000	11000	12000	14000	16000	19000	22000	28000	31000	35000	40000	45000	50000
15	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
15.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
16	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
16.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
17	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
17.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
18	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
18.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
19	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
19.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
20	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
20.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
21	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
21.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
22	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
22.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
23	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
23.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
24	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
24.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
25	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
25.5	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
26	22673	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
26.5	21342	22933	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
27	20038	21549	23335	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
27.5	18777	20200	21903	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
28	17511	18866	20489	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
28.5	16272	17542	19082	22495	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
29	15036	16258	17697	20940	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
29.5	13830	14968	16338	19415	22907	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
30	12625	13697	14991	17919	21229	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
30.5	11440	12436	13660	16418	19567	23574	23574	23574	23574	23574	23574	23574	23574	23574	23574
31	10266	11209	12360	14968	17951	22319	23574	23574	23574	23574	23574	23574	23574	23574	23574
31.5	9024	9880	10964	13403	16179	20282	21975	22419	22419	22419	22419	22419	22419	22419	22419
32	7739	8531	9505	11736	14325	18147	19741	20159	20159	20159	20159	20159	20159	20159	20159

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN001S: Treated process wastewater, sanitary wastewater, and storm water runoff associated with the production of pulp and paper 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
2,3,7,8-Tetrachlorodibenzo-P-Dioxin 4/	-	0.00000216 lbs/day	-	-	REPORT ppq	Semi-Annual	24-Hr Composite	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ The quantity of discharge used to calculate the mass discharged shall be the average of all daily process wastewater discharges occurring during the past 12 months of mill operation. Zero process discharge days shall not be used in the calculation of daily average flow.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN001T: Treated process wastewater, sanitary wastewater, and storm water runoff associated with the production of pulp and paper 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Toxicity, Ceriodaphnia Chronic 4/	-	0 pass(0)/fail(1)	-	-	-	Annually	24-Hr Composite	-
Toxicity, Pimephales Chronic 4/	-	0 pass(0)/fail(1)	-	-	-	Annually	24-Hr Composite	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.C for Effluent Toxicity and Biomonitoring Requirements

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN001X: Treated process wastewater, sanitary wastewater, and storm water runoff associated with the production of pulp and paper 3/ 7/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Halogens, Adsorbable Organic 4/ 6/	2185 lbs/day	3335 lbs/day	-	-	-	Once/2 Weeks	24-Hr Composite	-
Halogens, Adsorbable Organic 5/ 6/	2407 lbs/day	3675 lbs/day	-	-	-	Once/2 Weeks	24-Hr Composite	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ These limitations will apply when the total bleach plant production is less than 1785 air-dried metric tons (unbleached) per day as a monthly average.

5/ These limitations will apply when the total bleach plant production is greater than 1785 air-dried metric tons (unbleached) per day as a monthly average.

6/ EPA Method 1650 shall be used for the analysis of AOX. See Part IV.H for required minimum level.

7/ The permittee is required to notify the Department when a monthly average of greater than 1785 air-dried metric tons (unbleached) per day has been obtained.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN001Y: Treated process wastewater, sanitary wastewater, and storm water runoff associated with the production of pulp and paper 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Pentachlorophenol 4/	-	5.33 lbs/day	-	-	-	Annually	Composite	-
Trichlorophenol 4/	-	33.3 lbs/day	-	-	-	Annually	Composite	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ Monitoring requirements and limitations for this parameter do not apply if the permittee certifies that chlorophenolic-containing biocides are not used. Certification of non-use shall be submitted annually by January 28th if the permittee selects this option. If monitoring does not apply, a value of "*9" or "NODI=9" should be entered on the discharge monitoring report for these parameters.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN002S: Storm water runoff from non-process areas and storm water from Borrow Pit A 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Turbidity 5/	-	-	-	-	REPORT NTU	Semi-Annually	Grab	-
BOD, 5-Day (20 Deg. C)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	-
Solids, Total Suspended	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Solids, Settleable 5/	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Cadmium, Total (As Cd)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Chromium, Total (As Cr)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Copper, Total (As Cu)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

5/ To be monitored only when construction activities are occurring.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN002S (continued): Storm water runoff from non-process areas and storm water from Borrow Pit A 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	-
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	-
Solids, Total Dissolved (TDS)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN002Y: Storm water runoff from non-process areas and storm water from Borrow Pit A 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Chemical Oxygen Demand (COD)	-	-	-	-	REPORT mg/l	Annually	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN003S: Storm water runoff from non-process areas 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
BOD, 5-Day (20 Deg. C)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	-
Solids, Total Suspended	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	-
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01A1: A-Line (Hardwood) Bleach Plant internal requirements

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: A1-Sample filtrate from E-filtrate tank (Alkaline Stage); A2-Sample filtrate from D/C filtrate tank (Acid Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01AQ: A-Line (Hardwood) Bleach Plant internal requirements

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Chloroform 3/ 6/	10.02 lbs/day	16.75 lbs/day	-	-	-	Quarterly	Grab 4/	-
Chloroform 3/ 5/	9.56 lbs/day	15.99 lbs/day	-	-	-	Quarterly	Grab 4/	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: A1-Sample filtrate from E-filtrate tank (Alkaline Stage); A2-Sample filtrate from D/C filtrate tank (Acid Stage). See footnote 5/ for chloroform sampling requirements.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ Monitoring requirements and limitations for chloroform is not required if a chloroform certification program in accordance with 40 CFR 430.02(f) is developed. Certification reports should be submitted annually by January 28th if the permittee selects this option. If monitoring does not apply, a value of "*9" or "NODI=9" should be entered on the discharge monitoring report for these parameters.

4/ Six (6) grab samples, 40 milliliters each, for chloroform shall be collected over a 24-hour period (one collected every 4 hours for 24 hours) at each sampling location noted in footnote 1/ above. Grab samples are to be obtained from each acid and alkaline sewer line. Grab samples collected from alkaline sewer lines may be combined by flow-weighted composite into one sample for analysis in the lab. Grab samples collected from acid sewer lines may be composited in the same manner. If separate acid and alkaline sewers do not exist, then sample collection shall be obtained at the nearest accessible point from the bleach plant. Samples are to be cooled during and after collection and are to be collected in such a manner that the samples do not contain entrained air (bubbles). In lieu of grab samples, sampling can be achieved with an accepted automated sampler designed for chloroform service and approved by EPA.

5/ These limitations will apply when the total A-Line Bleach Plant production is less than 1100 air-dried metric tons (unbleached) per day as a monthly average.

6/ These limitations will apply when the total A-Line Bleach Plant production is greater than 1100 air-dried metric tons (unbleached) per day as a monthly average.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01AS: A-Line (Hardwood) Bleach Plant internal requirements 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
2,3,7,8 Tetrachlorodibenzo-P-Dioxin	-	-	-	-	9.999 pg/l	Semi-Annually	Composite	-
2,4,6-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
2,3,7,8 Tetrachlorodibenzofuran (TCDF)	-	-	-	-	31.9 pg/l	Semi-Annually	Composite	-
Pentachlorophenol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
3,4,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
3,4,6-Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
2,4,5-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
3,4,5-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: A1-Sample filtrate from E-filtrate tank (Alkaline Stage); A2-Sample filtrate from D/C filtrate tank (Acid Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.H for Required Test Methods and Minimum Levels.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01AS (continued): A-Line (Hardwood) Bleach Plant internal requirements 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
3,4,5 Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Tetrachloroguaiacol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Tetrachlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Trichlorosyringol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
4,5,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
2,3,4,6-Tetrachlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: A1-Sample filtrate from E-filtrate tank (Alkaline Stage); A2-Sample filtrate from D/C filtrate tank (Acid Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.H for Required Test Methods and Minimum Levels.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01B1: B-Line (Softwood) Bleach Plant internal requirements

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: B1-Sample filtrate at point downstream of D1 Seal Tank, D2 Seal Tank, and CI2 Seal Tank (Acid Stage); B2-Sample filtrate at point downstream of B1 Plant Scrubber and E/O Seal Tank (Alkaline Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01BQ: B-Line (Softwood) Bleach Plant internal requirements

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Chloroform 3/ 5/	4.95 lbs/day	8.28 lbs/day	-	-	-	Quarterly	Grab 4/	-
Chloroform 3/ 6/	5.97 lbs/day	9.99 lbs/day	-	-	-	Quarterly	Grab 4/	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: B1-Sample filtrate at point downstream of D1 Seal Tank, D2 Seal Tank, and CI2 Seal Tank (Acid Stage); B2-Sample filtrate at point downstream of B1 Plant Scrubber and E/O Seal Tank (Alkaline Stage). See footnote 5/ for chloroform sampling requirements.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ Monitoring requirements and limitations for chloroform is not required if a chloroform certification program in accordance with 40 CFR 430.02(f) is developed. Certification reports should be submitted annually by January 28th if the permittee selects this option. If monitoring does not apply, a value of "*9" or "NODI=9" should be entered on the discharge monitoring report for these parameters.

4/ Six (6) grab samples, 40 milliliters each, for chloroform shall be collected over a 24-hour period (one collected every 4 hours for 24 hours) at each sampling location noted in footnote 1/ above. Grab samples are to be obtained from each acid and alkaline sewer line. Grab samples collected from alkaline sewer lines may be combined by flow-weighted composite into one sample for analysis in the lab. Grab samples collected from acid sewere lines may be composited in the same manner. If separate acid and alkaline sewers do not exist, then sample collection shall be obtained at the nearest accessible point from the bleach plant. Samples are to be cooled during and after collection and are to be collected in such a manner that the samples do not contain entrained air (bubbles). In lieu of grab samples, sampling can be achieved with an accepted automated sampler designed for chloroform service and approved by EPA.

5/ These limitations will apply when the total B-Line Bleach Plant production is less than 685 air-dried metric tons (unbleached) per day as a monthly average.

6/ These limitations will apply when the total B-Line Bleach Plant production is greater than 685 air-dried metric tons (unbleached) per day as a monthly average.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01BS: B-Line (Softwood) Bleach Plant internal requirements 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
2,3,7,8 Tetrachlorodibenzo-P-Dioxin	-	-	-	-	9.999 pg/l	Semi-Annually	Composite	-
2,4,6-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
2,3,7,8 Tetrachlorodibenzofuran (TCDF)	-	-	-	-	31.9 pg/l	Semi-Annually	Composite	-
Pentachlorophenol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
3,4,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
3,4,6-Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
2,4,5-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
3,4,5-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: B1-Sample filtrate at point downstream of D1 Seal Tank, D2 Seal Tank, and CI2 Seal Tank (Acid Stage); B2-Sample filtrate at point downstream of B1 Plant Scrubber and E/O Seal Tank (Alkaline Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.H for Required Test Methods and Minimum Levels.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01BS (continued): B-Line (Softwood) Bleach Plant internal requirements 3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
3,4,5 Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Tetrachloroguaiacol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Tetrachlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	-
Trichlorosyringol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
4,5,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-
2,3,4,6-Tetrachlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	-

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: B1-Sample filtrate at point downstream of D1 Seal Tank, D2 Seal Tank, and CI2 Seal Tank (Acid Stage); B2-Sample filtrate at point downstream of B1 Plant Scrubber and E/O Seal Tank (Alkaline Stage). Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of six (6) equal volume grab samples collected over equal time intervals (one collected every 4 hours for 24 hours). All composite samples shall be collected for the total period of discharge not to exceed 24 hours. Following collection, the samples for all parameters shall be flow weighted as a simple composite sample in the lab.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.H for Required Test Methods and Minimum Levels.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01CS: Storm water runoff from Borrow Pit B 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS 1/				
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Turbidity 5/	-	-	-	-	REPORT NTU	Semi-Annually	Grab	-
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	-
Solids, Settleable 5/	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Cadmium, Total (As Cd)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Chromium, Total (As Cr)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Copper, Total (As Cu)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	-
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

5/ To be monitored only when construction activities are occurring.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01CS (continued): Storm water runoff from Borrow Pit B 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Solids, Total Dissolved (TDS)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN01CY: Storm water runoff from Borrow Pit B 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Chemical Oxygen Demand (COD)	-	-	-	-	REPORT mg/l	Annually	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge and shall be in accordance with the provisions of this permit.

2. Test Procedures

For the purpose of reporting and compliance, permittees shall use one of the following procedures:

a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance; however, should EPA approve a method with a lower minimum level during the term of this permit the permittee shall use the newly approved method.

b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

Permittees may develop an effluent matrix-specific ML, where an effluent matrix prevents attainment of the established ML. However, a matrix specific ML shall be based upon proper laboratory method and technique. Matrix-specific MLs must be approved by the Department, and may be developed by the permittee during permit issuance, reissuance, modification, or during compliance schedule.

In either case the measured value should be reported if the analytical result is at or above the ML and "0" reported for values below the ML.

c. For parameters without an EPA established ML, interim ML, or matrix-specific ML, a report of less than the detection limit shall constitute compliance if the detection limit of all analytical methods is higher than the permit limit using the most sensitive EPA approved method. For the purpose of calculating a monthly average, "0" shall be used for values reported less than the detection limit.

The Minimum Level utilized for procedures A and B above shall be reported on the permittee's DMR. When an EPA approved test procedure for analysis of a pollutant does not exist, the Director shall approve the procedure to be used.

3. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The facility name and location, point source number, date, time and exact place of sampling;

b. The name(s) of person(s) who obtained the samples or measurements;

c. The dates and times the analyses were performed;

d. The name(s) of the person(s) who performed the analyses;

e. The analytical techniques or methods used, including source of method and method number; and

f. The results of all required analyses.

4. Records Retention and Production

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the above reports or the application for this permit, for a period of at least three years from the date of the sample measurement, report or application. This period may be extended by request of the Director at any time. If litigation or other enforcement action, under the AWPCA and/or the FWPCA, is ongoing which involves any of the above records, the records shall be kept until the litigation is resolved. Upon the written request of the Director or his designee, the permittee shall provide the Director with a copy of any record required to be retained by this paragraph. Copies of these records shall not be submitted unless requested.

All records required to be kept for a period of three years shall be kept at the permitted facility or an alternate location approved by the Department in writing and shall be available for inspection.

5. Monitoring Equipment and Instrumentation

All equipment and instrumentation used to determine compliance with the requirements of this permit shall be installed, maintained, and calibrated in accordance with the manufacturer's instructions or, in the absence of manufacturer's instructions, in accordance with accepted practices. The permittee shall develop and maintain quality assurance procedures to ensure proper operation and maintenance of all equipment and instrumentation. The quality assurance procedures shall include the proper use, maintenance, and installation, when appropriate, of monitoring equipment at the plant site.

C. DISCHARGE REPORTING REQUIREMENTS

1. Reporting of Monitoring Requirements

a. The permittee shall conduct the required monitoring in accordance with the following schedule:

MONITORING REQUIRED MORE FREQUENTLY THAN MONTHLY AND MONTHLY shall be conducted during the first full month following the effective date of coverage under this permit and every month thereafter.

QUARTERLY MONITORING shall be conducted at least once during each calendar quarter. Calendar quarters are the periods of January through March, April through June, July through September, and October through December. The permittee shall conduct the quarterly monitoring during the first complete calendar quarter following the effective date of this permit and is then required to monitor once during each quarter thereafter. Quarterly monitoring may be done anytime during the quarter, unless restricted elsewhere in this permit, but it should be submitted with the last DMR due for the quarter, i.e. (March, June, September and December DMRs).

SEMIANNUAL MONITORING shall be conducted at least once during the period of January through June and at least once during the period of July through December. The permittee shall conduct the semiannual monitoring during the first complete calendar semiannual period following the effective date of this permit and is then required to monitor once during each semiannual period thereafter. Semiannual monitoring may be done anytime during the semiannual period, unless restricted elsewhere in this permit, but it should be submitted with the last DMR due for the month of the semiannual period, i.e. (June and December DMRs).

ANNUAL MONITORING shall be conducted at least once during the period of January through December. The permittee shall conduct the annual monitoring during the first complete calendar annual period following the effective date of this permit and is then required to monitor once during each annual period thereafter. Annual monitoring may be done anytime during the year, unless restricted elsewhere in this permit, but it should be submitted with the December DMR.

b. The permittee shall submit discharge monitoring reports (DMRs) on the forms provided by the Department and in accordance with the following schedule:

REPORTS OF MORE FREQUENTLY THAN MONTHLY AND MONTHLY TESTING shall be submitted on a **monthly** basis. The first report is due on the **28th** day of [ ]. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF QUARTERLY TESTING shall be submitted on a quarterly basis. The first report is due on the 28th day of [ ]. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF SEMIANNUAL TESTING shall be submitted on a semiannual basis. The reports are due on the 28th day of JANUARY and the 28th day of JULY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF ANNUAL TESTING shall be submitted on an annual basis. The first report is due on the 28th day of JANUARY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

c. The Department is utilizing a web-based electronic environmental (E2) DMR reporting system for submittal of DMRs. **If the permittee is not already participating in the E2 DMR system, the permittee must apply for participation in the system within 180 days of coverage under this permit unless the facility submits in writing valid justification as to why they cannot participate and the Department approves in writing utilization of hard copy DMR submittals.** Once the permittee is enrolled in the E2 DMR system, the permittee must utilize the system for the submittal of DMRs unless otherwise allowed by this permit. To participate in the E2 DMR system, the Permittee Participation Package may be downloaded online at **https://e2.adem.alabama.gov/npdes**. If the E2 DMR system is down (i.e., electronic submittal of DMR data is unable to be completed due to technical problems originating with the Department's

system: this could include entry/submittal issues with an entire set of DMRs or individual parameters), the permittee is not relieved of their obligation to submit DMR data to the Department by the required submittal date. However, if the E2 DMR system is down on the 28th day of the month or is down for an extended period of time as determined by the Department when a DMR is required to be submitted, the facility may submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date. Within five calendar days of the E2 DMR system resuming operation, the permittee shall enter the data into the E2 DMR system, unless an alternate timeframe is approved by the Department. An attachment should be included with the E2 DMR submittal verifying the original submittal date (date of the fax, copy of dated e-mail, or hand-delivery stamped date). If a permittee is allowed to submit via the US Postal Service, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit. If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR form and the increased frequency shall be indicated on the DMR form. In the event no discharge from a point source identified in Provision I.A of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR form.

d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules and Regulations, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

e. All Discharge Monitoring Report forms required to be submitted by this permit, the AWPCA, and the Department's Rules shall be addressed to:

Alabama Department of Environmental Management
Permits and Services Division
Environmental Data Section
Post Office Box 301463
Montgomery, Alabama 36130-1463

Certified and Registered Mail containing Discharge Monitoring Reports shall be addressed to:

Alabama Department of Environmental Management
Permits and Services Division
Environmental Data Section
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

f. All other correspondence and reports required to be submitted by this permit, the AWPCA, and the Department's Rules shall be addressed to:

Alabama Department of Environmental Management
Water Division
Post Office Box 301463
Montgomery, Alabama 36130-1463

Certified and Registered Mail shall be addressed to:

Alabama Department of Environmental Management
Water Division
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

g. If this permit is a reissuance, then the permittee shall continue to submit DMRs in accordance with the requirements of their previous permit until such time as DMRs are due as discussed in Part I.C.1.b. above.

2. Noncompliance Notification

a. 24-Hour Noncompliance Reporting

The permittee shall report to the Director, within 24-hours of becoming aware of the noncompliance, any noncompliance which may endanger health or the environment. This shall include but is not limited to the following circumstances:

(1) does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I. A. of this permit which is denoted by an "(X)";

(2) threatens human health or welfare, fish or aquatic life, or water quality standards;

(3) does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);

(4) contains a quantity of a hazardous substance which has been determined may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);

(5) exceeds any discharge limitation for an effluent characteristic as a result of an unanticipated bypass or upset; and

(6) is an unpermitted direct or indirect discharge of a pollutant to a water of the state (unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision).

The permittee shall orally report the occurrence and circumstances of such discharge to the Director within 24-hours after the permittee becomes aware of the occurrence of such discharge. In addition to the oral report, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c no later than five (5) days after becoming aware of the occurrence of such discharge.

b. If for any reason, the permittee's discharge does not comply with any limitation of this permit, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c below, such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Part I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.

c. Any written report required to be submitted to the Director or Designee by Part I.C.2 a. or b. shall be submitted using a copy of the Noncompliance Notification Form provided with this permit and shall include the following information:

(1) A description of the discharge and cause of noncompliance;

(2) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and

(3) A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence.

D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance

The permittee shall give the Director written advance notice of any planned changes or other circumstances regarding a facility which may result in noncompliance with permit requirements.

2. Termination of Discharge

The permittee shall notify the Director, in writing, when all discharges from any point source(s) identified in Provision I. A. of this permit have permanently ceased. This notification shall serve as sufficient cause for instituting procedures for modification or termination of the permit.

3. Updating Information

a. The permittee shall inform the Director of any change in the permittee's mailing address, telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules, and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.

b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

4. Duty to Provide Information

The permittee shall furnish to the Director, within a reasonable time, any information which the Director or his designee may request to determine whether cause exists for modifying, revoking and re-issuing, suspending, or terminating this permit, in whole or in part, or to determine compliance with this permit.

5. Cooling Water and Boiler Water Additives

a. The permittee shall notify the Director in writing not later than thirty (30) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in a cooling or boiler system, not identified in the application for this permit, from which discharge is allowed by this permit. Notification is not required for additives that do not contain a heavy metal(s) as an active ingredient and that pass through a wastewater treatment system prior to discharge nor is notification required for additives that should not reasonably be expected to cause the cooling water or boiler water to exhibit toxicity as determined by analysis of manufacturer's data or testing by the permittee. Such notification shall include:

(1) name and general composition of biocide or chemical;

(2) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach;

(2) quantities to be used;

(3) frequencies of use;

(4) proposed discharge concentrations; and

(6) EPA registration number, if applicable.

b. The use of a biocide or additive containing tributyl tin, tributyl tin oxide, zinc, chromium or related compounds in cooling or boiler system(s), from which a discharge regulated by this permit occurs, is prohibited except as exempted below. The use of a biocide or additive containing zinc, chromium or related compounds may be used in special circumstances if (1) the permit contains limits for these substances, or (2) the applicant demonstrates during the application process that the use of zinc, chromium or related compounds as a biocide or additive will not pose a reasonable potential to violate the applicable State water quality standards for these substances. The use of any additive, not identified in this permit or in the application for this permit or not exempted from notification under this permit is prohibited, prior to a determination by the Department that permit modification to control discharge of the additive is not required or prior to issuance of a permit modification controlling discharge of the additive.

6. Permit Issued Based On Estimated Characteristics

a. If this permit was issued based on estimates of the characteristics of a process discharge reported on an EPA NPDES Application Form 2D (EPA Form 3510-2D), the permittee shall complete and submit an EPA NPDES Application Form 2C (EPA Form 3510-2C) no later than two years after the date that discharge begins. Sampling required for completion of the Form 2C shall occur when a discharge(s) from the process(s) causing the new or increased discharge is occurring. If this permit was issued based on estimates concerning the composition of a stormwater discharge(s), the permittee shall perform the sampling required by EPA NPDES Application Form 2F (EPA Form 3510-2F) no later than one year after the industrial activity generating the stormwater discharge has been fully initiated.

b. This permit shall be reopened if required to address any new information resulting from the completion and submittal of the Form 2C and or 2F.

E. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the discharge limitations specified in Provision I. A. in accordance with the following schedule:

COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

PART II OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES

A. OPERATIONAL AND MANAGEMENT REQUIREMENTS

1. Facilities Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities only when necessary to achieve compliance with the conditions of the permit.

2. Best Management Practices

a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.

b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.

c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

3. Spill Prevention, Control, and Management

The permittee shall provide spill prevention, control, and/or management sufficient to prevent any spills of pollutants from entering a water of the state or a publicly or privately owned treatment works. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and which shall prevent the contamination of groundwater and such containment system shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided.

B. OTHER RESPONSIBILITIES

1. Duty to Mitigate Adverse Impacts

The permittee shall promptly take all reasonable steps to mitigate and minimize or prevent any adverse impact on human health or the environment resulting from noncompliance with any discharge limitation specified in Provision I. A. of this permit, including such accelerated or additional monitoring of the discharge and/or the receiving waterbody as necessary to determine the nature and impact of the noncomplying discharge.

2. Right of Entry and Inspection

The permittee shall allow the Director, or an authorized representative, upon the presentation of proper credentials and other documents as may be required by law to:

a. enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and

d. sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

C. BYPASS AND UPSET

1. Bypass

a. Any bypass is prohibited except as provided in b. and c. below:

b. A bypass is not prohibited if:

(1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;

(2) It enters the same receiving stream as the permitted outfall; and

(3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.

c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;

(2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and

(3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.

d. The permittee has the burden of establishing that each of the conditions of Provision II.C.1.b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in a. and an exemption, where applicable, from the discharge limitations specified in Provision I. A. of this permit.

2. Upset

a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) No later than 24-hours after becoming aware of the occurrence of the upset, the permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and

(2) No later than five (5) days after becoming aware of the occurrence of the upset, the permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that (i) an upset occurred; (ii) the permittee can identify the specific cause(s) of the upset; (iii) the permittee's facility was being properly operated at the time of the upset; and (iv) the permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.

b. The permittee has the burden of establishing that each of the conditions of Provision II. C.2.a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I.A. of this permit.

D. DUTY TO COMPLY WITH PERMIT, RULES, AND STATUTES

1. Duty to Comply

a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, for permit termination, revocation and reissuance, suspension, modification; or denial of a permit renewal application.

b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.

c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.

d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.

e. Nothing in this permit shall be construed to preclude and negate the permittee's responsibility or liability to apply for, obtain, or comply with other ADEM, Federal, State, or Local Government permits, certifications, licenses, or other approvals.

2. Removed Substances

Solids, sludges, filter backwash, or any other pollutant or other waste removed in the course of treatment or control of wastewaters shall be disposed of in a manner that complies with all applicable Department Rules.

3. Loss or Failure of Treatment Facilities

Upon the loss or failure of any treatment facilities, including but not limited to the loss or failure of the primary source of power of the treatment facility, the permittee shall, where necessary to maintain compliance with the discharge limitations specified in Provision I. A. of this permit, or any other terms or conditions of this permit, cease, reduce, or otherwise control production and/or all discharges until treatment is restored. If control of discharge during loss or failure of the primary source of power is to be accomplished by means of alternate power sources, standby generators, or retention of inadequately treated effluent, the permittee must furnish to the Director within six months a certification that such control mechanisms have been installed.

4. Compliance with Statutes and Rules

a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36130.

b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

E. PERMIT TRANSFER, MODIFICATION, SUSPENSION, REVOCATION, AND REISSUANCE

1. Duty to Reapply or Notify of Intent to Cease Discharge

a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.

b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

2. Change in Discharge

a. The permittee shall apply for a permit modification at least 180 days in advance of any facility expansion, production increase, process change, or other action that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant such that existing permit limitations would be exceeded or that could result in an additional discharge point. This requirement applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.

b. The permittee shall notify the Director as soon as it is known or there is reason to believe:

(1) That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:

(a) one hundred micrograms per liter;

(b) two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dini-trophenol; and one milligram per liter for antimony;

(c) five times the maximum concentration value reported for that pollutant in the permit application; or

(2) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(a) five hundred micrograms per liter;

(b) one milligram per liter for antimony;

(c) ten times the maximum concentration value reported for that pollutant in the permit application.

3. Transfer of Permit

This permit may not be transferred or the name of the permittee changed without notice to the Director and subsequent modification or revocation and reissuance of the permit to identify the new permittee and to incorporate any other changes as may be required under the FWPCA or AWPCA. In the case of a change in name, ownership or control of the permittee's premises only, a request for permit modification in a format acceptable to the Director is required at least 30 days prior to the change. In the case of a change in name, ownership or control of the permittee's premises accompanied by a change or proposed change in effluent characteristics, a complete permit application is required to be submitted to the Director at least 180 days prior to the change. Whenever the Director is notified of a change in name, ownership or control, he may decide not to modify the existing permit and require the submission of a new permit application.

4. Permit Modification and Revocation

a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;

(2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or

(3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.

b. This permit may be modified during its term for cause, including but not limited to, the following:

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;

(2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;

(3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;

(4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;

(5) Errors in calculation of discharge limitations or typographical or clerical errors were made;

(6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;

(7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;

(8) To agree with a granted variance under 30l(c), 30l(g), 30l(h), 30l(k), or 3l6(a) of the FWPCA or for fundamentally different factors;

(9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;

(10) When required by the reopener conditions in this permit;

(11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

(12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;

(13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or

(14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules.

5. Permit Termination

This permit may be terminated during its term for cause, including but not limited to, the following:

a. Violation of any term or condition of this permit;

b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;

c. Materially false or inaccurate statements or information in the permit application or the permit;

d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;

e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;

f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;

g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee; or

h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

6. Permit Suspension

This permit may be suspended during its term for noncompliance until the permittee has taken action(s) necessary to achieve compliance.

7. Request for Permit Action Does Not Stay Any Permit Requirement

The filing of a request by the permittee for modification, suspension or revocation of this permit, in whole or in part, does not stay any permit term or condition.

F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION

If any applicable effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a), for a toxic pollutant discharged by the permittee and such standard or prohibition is more stringent than any discharge limitation on the pollutant specified in Provision I. A. of this permit, or controls a pollutant not limited in Provision I. A. of this permit, this permit shall be modified to conform to the toxic pollutant effluent standard or prohibition and the permittee shall be notified of such modification. If this permit has not been modified to conform to the toxic pollutant effluent standard or prohibition before the effective date of such standard or prohibition, the permittee shall attain compliance with the requirements of the standard or prohibition within the time period required by the standard or prohibition and shall continue to comply with the standard or prohibition until this permit is modified or reissued.

G. DISCHARGE OF WASTEWATER GENERATED BY OTHERS

The discharge of wastewater, generated by any process, facility, or by any other means not under the operational control of the permittee or not identified in the application for this permit or not identified specifically in the description of an outfall in this permit is not authorized by this permit.

PART III OTHER PERMIT CONDITIONS

A. CIVIL AND CRIMINAL LIABILITY

1. Tampering

Any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained or performed under the permit shall, upon conviction, be subject to penalties as provided by the AWPCA.

2. False Statements

Any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be subject to penalties as provided by the AWPCA.

3. Permit Enforcement

a. Any NPDES permit issued or reissued by the Department is a permit for the purpose of the AWPCA and the FWPCA and as such any terms, conditions, or limitations of the permit are enforceable under state and federal law.

b. Any person required to have a NPDES permit pursuant to ADEM Administrative Code Chapter 335-6-6 and who discharges pollutants without said permit, who violates the conditions of said permit, who discharges pollutants in a manner not authorized by the permit, or who violates applicable orders of the Department or any applicable rule or standard of the Department, is subject to any one or combination of the following enforcement actions under applicable state statutes.

(1) An administrative order requiring abatement, compliance, mitigation, cessation, clean-up, and/or penalties;

(2) An action for damages;

(3) An action for injunctive relief; or

(4) An action for penalties.

c. If the permittee is not in compliance with the conditions of an expiring or expired permit the Director may choose to do any or all of the following provided the permittee has made a timely and complete application for reissuance of the permit:

(1) initiate enforcement action based upon the permit which has been continued;

(2) issue a notice of intent to deny the permit reissuance. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;

(3) reissue the new permit with appropriate conditions; or

(4) take other actions authorized by these rules and AWPCA.

4. Relief from Liability

Except as provided in Provision II.C.1 (Bypass) and Provision II.C.2 (Upset), nothing in this permit shall be construed to relieve the permittee of civil or criminal liability under the AWPCA or FWPCA for noncompliance with any term or condition of this permit.

B. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject under Section 311 of the FWPCA, 33 U.S.C. Section 1321.

C. PROPERTY AND OTHER RIGHTS

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, trespass, or any infringement of federal, state, or local laws or regulations, nor does it authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any waters of the state or of the United States.

D. AVAILABILITY OF REPORTS

Except for data determined to be confidential under Code of Alabama 1975, Section 22-22-9(c), all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Department. Effluent data shall not be considered confidential.

E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.

2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.

3. Construction has begun when the owner or operator has:

   a. begun, or caused to begin as part of a continuous on-site construction program:

      (1) any placement, assembly, or installation of facilities or equipment; or

      (2) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

   b. entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under the paragraph. The entering into a lease with the State of Alabama for exploration and production of hydrocarbons shall also be considered beginning construction.

F. COMPLIANCE WITH WATER QUALITY STANDARDS

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.

2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.

3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

G. GROUNDWATER

Unless specifically authorized under this permit, this permit does not authorize the discharge of pollutants to groundwater. Should a threat of groundwater contamination occur, the Director may require groundwater monitoring to properly assess the degree of the problem and the Director may require that the Permittee undertake measures to abate any such discharge and/or contamination.

H. DEFINITIONS

1. Average monthly discharge limitation - means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).

2. Average weekly discharge limitation - means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).

3. Arithmetic Mean – means the summation of the individual values of any set of values divided by the number of individual values.

4. AWPCA - means the Alabama Water Pollution Control Act.

5. BOD – means the five-day measure of the pollutant parameter biochemical oxygen demand.

6. Bypass - means the intentional diversion of waste streams from any portion of a treatment facility.

7. CBOD – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.

8. Daily discharge - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.

9. Daily maximum - means the highest value of any individual sample result obtained during a day.

10. Daily minimum - means the lowest value of any individual sample result obtained during a day.

11. Day - means any consecutive 24-hour period.

12. Department - means the Alabama Department of Environmental Management.

13. Director - means the Director of the Department.

14. Discharge - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).

15. Discharge Monitoring Report (DMR) - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.

16. DO – means dissolved oxygen.

17. 8HC – means 8-hour composite sample, including any of the following:

    a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

    b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

18. EPA - means the United States Environmental Protection Agency.

19. FC – means the pollutant parameter fecal coliform.

20. Flow – means the total volume of discharge in a 24-hour period.

21. FWPCA - means the Federal Water Pollution Control Act.

22. Geometric Mean – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).

23. Grab Sample – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.

24. Indirect Discharger – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.

25. Industrial User – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D – Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.

26. MGD – means million gallons per day.

27. Monthly Average – means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.

28. New Discharger – means a person, owning or operating any building, structure, facility or installation:

    a. from which there is or may be a discharge of pollutants;

    b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and

    c. which has never received a final effective NPDES permit for dischargers at that site.

29. NH3-N – means the pollutant parameter ammonia, measured as nitrogen.

30. Permit application - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.

31. Point source - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).

32. Pollutant - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.

33. Privately Owned Treatment Works – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".

34. Publicly Owned Treatment Works – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.

35. Receiving Stream – means the "waters" receiving a "discharge" from a "point source".

36. Severe property damage - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

37. Significant Source – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work's capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.

38. Solvent – means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.

39. TKN – means the pollutant parameter Total Kjeldahl Nitrogen.

40. TON – means the pollutant parameter Total Organic Nitrogen.

41. TRC – means Total Residual Chlorine.

42. TSS – means the pollutant parameter Total Suspended Solids.

43. 24HC – means 24-hour composite sample, including any of the following:

    a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;

    b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or

    c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.

44. Upset - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

45. Waters - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the

property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.

46. Week - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.

47. Weekly (7-day and calendar week) Average – is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

I. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART IV ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS

1. BMP Plan

The permittee shall develop and implement a Best Management Practices (BMP) Plan which prevents, or minimizes the potential for, the release of pollutants from ancillary activities, including material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading operations, and sludge and waste disposal areas, to the waters of the State through plant site runoff; spillage or leaks; sludge or waste disposal; or drainage from raw material storage.

2. Plan Content

The permittee shall prepare and implement a best management practices (BMP) plan, which shall:

a. Establish specific objectives for the control of pollutants:

(1) Each facility component or system shall be examined for its potential for causing a release of significant amounts of pollutants to waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

(2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface waters, the plan should include a prediction of the direction, rate of flow, and total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance.

b. Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;

c. Establish a program to identify and repair leaking equipment items and damaged containment structures, which may contribute to contaminated stormwater runoff. This program must include regular visual inspections of equipment, containment structures and of the facility in general to ensure that the BMP is continually implemented and effective;

d. Prevent the spillage or loss of fluids, oil, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of stormwater from these substances;

e. Prevent or minimize stormwater contact with material stored on site;

f. Designate by position or name the person or persons responsible for the day to day implementation of the BMP;

g. Provide for routine inspections, on days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general to ensure that the BMP is continually implemented and effective;

h. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate stormwater;

i. Develop a solvent management plan, if solvents are used on site. The solvent management plan shall include as a minimum lists of the solvents on site; the disposal method of solvents used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that solvents do not routinely spill or leak into the stormwater;

j. Provide for the disposal of all used oils, hydraulic fluids, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulations;

k. Include a diagram of the facility showing the locations where stormwater exits the facility, the locations of any structure or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater, the locations of any collection and handling systems;

l. Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;

m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and shall prevent the contamination of groundwater. The containment system shall also be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided;

n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;

o. Be reviewed by plant engineering staff and the plant manager; and

p. Bear the signature of the plant manager.

3. Compliance Schedule

The permittee shall have reviewed (and revised if necessary) and fully implemented the BMP plan as soon as practicable but no later than six months after the effective date of this permit.

4. Department Review

a. When requested by the Director or his designee, the permittee shall make the BMP available for Department review.

b. The Director or his designee may notify the permittee at any time that the BMP is deficient and require correction of the deficiency.

c. The permittee shall correct any BMP deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.

5. Administrative Procedures

a. A copy of the BMP shall be maintained at the facility and shall be available for inspection by representatives of the Department.

b. A log of the routine inspection required above shall be maintained at the facility and shall be available for inspection by representatives of the Department. The log shall contain records of all inspections performed for the last three years and each entry shall be signed by the person performing the inspection.

c. The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required.

d. BMP Plan Modification. The permittee shall amend the BMP plan whenever there is a change in the facility or change in operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.

e. BMP Plan Review. The permittee shall complete a review and evaluation of the BMP plan at least once every three years from the date of preparation of the BMP plan. Documentation of the BMP Plan review and evaluation shall be signed and dated by the Plant Manager.

B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

1. Stormwater Flow Measurement

a. All stormwater samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches.

b. The total volume of stormwater discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

c. The volume may be measured using flow measuring devices, or estimated based on a modification of the Rational Method using total depth of rainfall, the size of the drainage area serving a stormwater outfall, and an estimate of the runoff coefficient of the drainage area. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

2. Stormwater Sampling

a. A grab sample, if required by this permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow-weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.

b. All test procedures will be in accordance with part I.B. of this permit.

C. EFFLUENT TOXICITY LIMITATIONS AND BIOMONITORING REQUIREMENTS

1. The permittee shall perform short-term chronic toxicity tests on the wastewater discharges required to be tested for chronic toxicity by Part I of this permit.

a. Test Requirements

(1) The samples shall be diluted using appropriate control water, to the Instream Waste Concentration (IWC) which is 8% effluent. The IWC is the actual concentration of effluent, after mixing, in the receiving stream during a 7-day, 10-year flow period.

(2) Any test result that shows a statistically significant reduction in survival, growth, or reproduction between the control and the test at the 95% confidence level indicate chronic toxicity and constitute noncompliance with this permit.

b. General Test Requirements

(1) A minimum of three (3) 24-hour composite samples shall be obtained for use in the above biomonitoring tests and collected every other day so that the laboratory receives water samples on the first, third, and fifth day of the seven-day test period. The holding time for each composite sample shall not exceed 36 hours. The control water shall be a water prepared in the laboratory in accordance with the EPA procedure described in EPA 821-R-02-013 or the most current edition or another control water selected by the permittee and approved by the Department.

(2) Effluent toxicity tests in which the control survival is less than 80%, P. promelas dry weight per surviving control organism is less than 0.25 mg, Ceriodaphnia number of young per surviving control organism is less than 15, Ceriodaphnia reproduction where less than 60% of surviving control females produce three broods or in which the other requirements of the EPA Test Procedure are not met shall be unacceptable and the permittee shall rerun the tests as soon as practical within the monitoring period.

(3) In the event of an invalid test, upon subsequent completion of a valid test, the results of all tests, valid and invalid, are reported with an explanation of the tests performed and results.

c. Reporting Requirements

(1) The permittee shall notify the Department in writing within 48 hours after toxicity has been demonstrated by the scheduled test(s).

(2) Biomonitoring test results obtained during each monitoring period shall be summarized and reported using the appropriate Discharge Monitoring Report (DMR) form approved by the Department. In accordance with Section 2 of this part, an effluent toxicity report containing the information in Section 2 shall be included with the DMR. Two copies of the test results must be submitted to the Department no later than 28 days after the month in which the tests were performed.

d. Additional Testing Requirements

(1) If chronic toxicity is indicated (noncompliance with permit limit), the permittee shall perform two additional valid chronic toxicity tests in accordance with these procedures to determine the extent and duration of the toxic condition. The toxicity tests shall run consecutively beginning on the first calendar week following the date on which the permittee became aware of the permit noncompliance and the results of these tests shall be submitted no later than 28 days following the month in which the tests were performed.

(2) After evaluation of the results of the follow-up tests, the Department will determine if additional action is appropriate and may require additional testing and/or toxicity reduction measures. The permittee may be required to perform a Toxicity Identification Evaluation (TIE) and/or a Toxicity Reduction Evaluation (TRE). The TIE/TRE shall be performed in accordance with the most recent protocols/guidance outlined by EPA (e.g., EPA/600/2-88/062, EPA/600/R-92/080, EPA/600/R-91-003, EPA/600/R-92/081, EPA/833/B-99/022 and/or EPA/600/6-91/005F, etc.)

e. Test Methods

(1) The tests shall be performed in accordance with the latest edition of the "EPA Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Water to Freshwater Organisms". The Larval Survival and Growth Test, Methods 1000.0, shall be used for the fathead minnow (*Pimephales promelas*) test and the Survival and Reproduction Test, Method 1002.0, shall be used for the cladoceran (*Ceriodaphnia dubia*) test.

2. Effluent Toxicity Testing Reports

The following information shall be submitted with each discharge monitoring report unless otherwise directed by the Department. The Department may at any time suspend or reinstate these requirements or may decrease or increase the frequency of submittals.

a. Introduction

(1) Facility name, location, and county

(2) Permit number

(3) Toxicity testing requirements of permit

(4) Name of receiving water body

(5) Contract laboratory information (if tests are performed under contract)

(a) Name of firm
(b) Telephone number
(c) Address

(6) Objective of test

b. Plant Operation

(1) Discharge Operating schedule (if other than continuous)

(2) Volume of discharge during sample collection to include Mean daily discharge on sample collection dates (MGD, CFS, GPM)

(3) Design flow of treatment facility at time of sampling

c. Source of Effluent and Dilution Water

(1) Effluent samples

(a) Sampling point
(b) Sample collection dates and times (to include composite sample start and finish times)
(c) Sample collection method
(d) Physical and chemical data of undiluted effluent samples (water temperature, pH, alkalinity, hardness, specific conductance, total residual chlorine (if applicable), etc.)
(e) Lapsed time from sample collection to delivery
(f) Lapsed time from sample collection to test initiation
(g) Sample temperature when received at the laboratory

(2) Dilution Water

(a) Source
(b) Collection/preparation date(s) and time(s)
(c) Pretreatment (if applicable)
(d) Physical and chemical characteristics (water temperature, pH, alkalinity, hardness, specific conductance, etc.)

d. Test Conditions

(1) Toxicity test method utilized

(2) End point(s) of test

(3) Deviations from referenced method, if any, and reason(s)

(4) Date and time test started

(5) Date and time test terminated

(6) Type and volume of test chambers

(7) Volume of solution per chamber

(8) Number of organisms per test chamber

(9) Number of replicate test chambers per treatment

(10) Test temperature, pH, and dissolved oxygen as recommended by the method (to include ranges)

(11) Specify if aeration was needed

(12) Feeding frequency, amount, and type of food

(13) Specify if (and how) pH control measures were implemented

(14) Light intensity (mean)

e. Test Organisms

(1) Scientific name

(2) Life stage and age

(3) Source

(4) Disease(s) treatment (if applicable)

f. Quality Assurance

(1) Reference toxicant utilized and source

(2) Date and time of most recent chronic reference toxicant test(s), raw data and current control chart(s). The most recent chronic reference toxicant test shall be conducted within 30 days of the routine.

(3) Dilution water utilized in reference toxicant test

(4) Results of reference toxicant test(s) (NOEC, IC25, PASS/FAIL, etc.), report concentration response relationship and evaluate test sensitivity

(5) Physical and chemical methods utilized

g. Results

(1) Provide raw toxicity data in tabular form, including daily records of affected organisms in each concentration (including controls) and replicate

(2) Provide table of endpoints: NOECs, IC25s, PASS/FAIL, etc. (as required in the applicable NPDES permit)

(3) Indicate statistical methods used to calculate endpoints

(4) Provide all physical and chemical data required by method

(5) Results of test(s) (NOEC, IC25, PASS/FAIL, etc.), report concentration-response relationship (definitive test only), report percent minimum significant difference (PMSD) calculated for sub-lethal endpoints determined by hypothesis testing.

h. Conclusions and Recommendations

(1) Relationship between test endpoints and permit limits

(2) Actions to be taken

1/ Adapted from "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms", Fourth Edition, October 2002 (EPA 821-R-02-013), Section 10, Report Preparation

D. BEST MANAGEMENT PRACTICES (BMPs) FOR SPENT PULPING LIQUOR, SOAP, AND TURPENTINE MANAGEMENT, SPILL PREVENTION, AND CONTROL

1. Applicability

This section applies to direct and indirect discharging pulp, paper, and paperboard mills with pulp production in Subparts B (Bleached Papergrade Kraft and Soda) and E (Papergrade Sulfite) of the Pulp and Paper Guidelines (40 CFR Part 430).

2. Specialized Definitions

a. Action Level: A daily pollutant loading that when exceeded triggers investigative or corrective action. The mill shall determine action levels by a statistical analysis of six months of daily measurements collected at the mill. For example, the lower action level may be the 75th percentile of the running seven-day averages (that value exceeded by 25 percent of the running seven-day averages) and the upper action level may be the 90th percentile of the running seven-day averages (that value exceeded by 10 percent of the running seven-day averages).

b. Equipment Items in Spent Pulping, Liquor, Soap, and Turpentine Service: Any process vessel, storage tank, pumping system, evaporator, heat exchanger, recovery furnace or boiler, pipeline, valve, fitting, or other device that contains, processes, transports, or comes into contact with spent pulping liquor, soap, or turpentine. Sometimes referred to as "equipment items".

c. Immediate Process Area: The location at the mill where pulping, screening, knotting, pulp washing, pulping liquor concentration, pulping liquor processing, and chemical recovery facilities are located, generally the battery limits of the aforementioned processes. "Immediate process area" includes spent pulping liquor storage and spill control tanks located at the mill, whether or not they are located in the immediate process area.

d. Intentional Diversion: The planned removal of spent pulping liquor, soap, or turpentine from equipment items in spent pulping liquor, soap, or turpentine service by the mill for any purpose including, but not limited to, maintenance, grade changes, or process shutdowns.

e. Mill: The owner or operator of a direct or indirect discharging pulp, paper, or paperboard manufacturing facility subject to this section.

f. Senior Technical Manager: The person designated by the mill manager to review the BMP Plan. The senior technical manager shall be the chief engineer at the mill, the manager of pulping and chemical recovery operations, or other such responsible person designated by the mill manager who has knowledge of and responsibility for pulping and chemical recovery operations.

g. Soap: The product of reaction between the alkali in Kraft pulping liquor and fatty acid portions of the wood, which precipitate out when water is evaporated from the spent pulping liquor.

h. Spent Pulping Liquor: For Kraft and soda mills "spent pulping liquor" means black liquor that is used, generated, stored, or processed at any point in the pulping and chemical recovery processes. For sulfite mills "spent pulping liquor" means any intermediate, final, or used chemical solution that is used, generated, stored, or processed at any point in the sulfite pulping and chemical recovery processes (e.g., ammonium-, calcium-, magnesium-, or sodium- based sulfite liquors).

i. Turpentine: A mixture of terpenes, principally pinene, obtained by the steam distillation of pine gum recovered from the condensation of digester relief gases from the cooking of softwoods by the Kraft pulping process. Sometimes referred to as sulfite turpentine.

3. Requirement to Implement Best Management Practices

a. The mill must implement the Best Management Practices (BMPs) specified in paragraphs (1) through (10) of this section. The primary objective of the BMPs is to prevent leaks and spills of spent pulping liquors, soap, and turpentine. The secondary objective is to contain, collect, and recover at the immediate process area, or otherwise control, those leaks, spills, and intentional diversions of spent pulping liquor, soap, and turpentine that do occur. BMPs must be developed according to best engineering practices and must be implemented in a manner that takes into account the specific circumstances at the mill.

b. The BMPs are as follows:

(1) The mill must return spilled or diverted spent pulping liquors, soap, and turpentine to the process to the maximum extent practicable as determined by the mill, recover such materials outside the process, or discharge spilled or diverted material at a rate that does not disrupt the receiving wastewater treatment system.

(2) The mill must establish a program to identify and repair leaking equipment items. This program must include:

(a) Regular visual inspections (e.g., once per day) of process areas with equipment items in spent pulping liquor, soap, and turpentine service;

(b) Immediate repairs of leaking equipment items, when possible. Leaking equipment items that cannot be repaired during normal operations must be identified, temporary means for mitigating the leaks must be provided, and the leaking equipment items repaired during the next maintenance outage;

(c) Identification of conditions under which production will be curtailed or halted to repair leaking equipment items or to prevent pulping liquor, soap, and turpentine leaks and spills; and

(d) A means for tracking repairs over time to identify those equipment items where upgrade or replacement may be warranted based on frequency and severity of leaks, spills, or failures.

(3) The mill must operate continuous, automatic monitoring systems that the mill determines are necessary to detect and control leaks, spills, and intentional diversions of spent pulping liquor, soap, and turpentine. These monitoring systems should be integrated with the mill process control system and may include, e.g., high level monitors and alarms on storage tanks; process area conductivity (or pH) monitors and alarms; and process area sewer, process wastewater, and wastewater treatment plant conductivity (or pH) monitors and alarms.

(4) The mill must establish a program of initial and refresher training of operators, maintenance personnel, and other technical and supervisory personnel who have the responsibility for operating, maintaining, or supervising the operation and maintenance of equipment items in spent pulping liquor, soap, and turpentine service. The refresher training must be conducted at least annually and the training program must be documented.

(5) The Mill must prepare a brief report that evaluates each spill of spent pulping liquor, soap, or turpentine that is not contained at the immediate process areas and any intentional diversion of spent pulping liquor, soap, and turpentine that is not contained at the immediate process area. The report must describe the equipment items involved, the circumstances leading to the incident, the effectiveness of the corrective actions taken to contain and recover the spill or intentional diversion, and plans to develop changes to equipment and operating and maintenance practices as necessary to prevent recurrence. Discussion of the reports must be included as part of the annual refresher training.

(6) The mill must establish a program to review any planned modifications to the pulping and chemical recovery facilities and any construction activities in the pulping and chemical recovery areas before these activities commence. The purpose of such review is to prevent leaks and spills of spent pulping liquor, soap, and turpentine during the planned modifications, and to ensure that construction and supervisory personnel are aware of possible liquor diversions and of the requirement to prevent leaks and spills of spent pulping liquors, soap, and turpentine during construction.

(7) The mill must install and maintain secondary containment (i.e., containment constructed of materials impervious to pulping liquors) for spent pulping liquor bulk storage tanks equivalent to the volume of the largest tank plus sufficient freeboard for precipitation. An annual tank integrity testing program, if coupled with other containment or diversion structures, may be substituted for secondary containment for spent pulping liquor bulk storage tanks.

(8) The mill must install and maintain secondary containment for turpentine bulk storage tanks.

(9) The mill must install and maintain curbing, diking or other means of isolating soap and turpentine processing and loading areas from the wastewater treatment facilities.

(10) The mill must conduct wastewater monitoring to detect leaks and spills, to track the effectiveness of the BMPs, and to detect trends in spent pulping liquor losses. Such monitoring must be performed in accordance with paragraph 9. of the following sections.

4. Requirement to Develop a BMP Plan

a. The mill must prepare and implement a BMP Plan. The BMP Plan must be based on a detailed engineering review as described in paragraphs 4.b. and c. of this section. The BMP Plan must specify the procedures and the practices required for the mill to meet the requirements of paragraph 3. of the previous section, the construction the mill determines is necessary to meet those requirements including a schedule for such construction, and the monitoring program (including the statistically derived action levels) that will be used to meet the requirements of paragraph 9. of the following sections. The BMP Plan also must specify the period of time that the mill determines the action levels established under paragraph 8. of the following sections may be exceeded without triggering the responses specified in paragraph 9. of the following sections.

b. The mill must conduct a detailed engineering review of the pulping and chemical recovery operations – including but not limited to process equipment, storage tanks, pipeline and pumping systems, loading and unloading facilities, and other appurtenant pulping and chemical recovery equipment items in spent pulping liquor, soap, and turpentine service – for the purpose of determining the magnitude and routing of potential leaks, spills, and intentional diversions of spent pulping liquors, soap, and turpentine during the following periods of operation:

(1) Process start-ups and shut downs;

(2) Maintenance;

(3) Production grade changes;

(4) Storm or other weather events;

(5) Power failures;

(6) Normal operations.

c. As part of the engineering review, the mill must determine whether existing spent pulping liquor containment facilities are of adequate capacity for collection and storage of anticipated intentional liquor diversions with sufficient contingency for collection and containment of spills. The engineering review must also consider:

(1) The need for continuous, automatic monitoring systems to detect and control leaks and spills of spent pulping liquor, soap, and turpentine;

(2) The need for process wastewater diversion facilities to protect end-of-pipe wastewater treatment facilities from adverse effects of spills and diversions of spent pulping liquors, soap, and turpentine;

(3) The potential for contamination of storm water from the immediate process areas; and

(4) The extent to which segregation and/or collection and treatment of contaminated storm water from the immediate process areas is appropriate.

5. Amendment of BMP Plan

a. The mill must amend its BMP Plan whenever there is a change in mill design, construction, operation, or maintenance that materially affects the potential for leaks or spills of spent pulping liquor, turpentine, or soap from the immediate process areas.

b. The mill must complete a review and evaluation of the BMP Plan five years after the first BMP Plan is prepared and, except as provided in paragraph 5.a. of this section, once every five years thereafter. As a result of this review and evaluation, the mill must amend the BMP Plan within three months of the review if the mill determines that any new or modified management practices and engineered controls are necessary to reduce significantly the likelihood of spent pulping liquor, soap, and turpentine leaks, spills, or intentional diversions from the immediate process areas, including a schedule for implementation of such practices and controls.

6. Review and Certification of BMP Plan

The BMP Plan, and any amendments thereto, must be reviewed by the senior technical manager at the mill and approved and signed by the mill manager. Any person signing the BMP Plan or its amendments must certify to the Department under penalty of law that the BMP Plan (or its amendments) has been prepared in accordance with good engineering practices and in accordance with this permit and 40 CFR Part 430. The mill is not required to obtain approval from the Department of the BMP Plan or any amendments thereto.

7. Record Keeping Requirements

a. The mill must maintain on its premises a complete copy of the current BMP Plan and the records specified in paragraph b. of this section and must make such BMP Plan and records available to the Department for review upon request.

b. The mill must maintain the following records for three years from the date they are created:

(1) Records tracking the repairs performed in accordance with the repair program described in paragraph 3.b.(2) of the previous sections;

(2) Records of initial and refresher training conducted in accordance with paragraph 3.b.(4) of the previous sections;

(3) Reports prepared in accordance with paragraph 3.b.(5) of the previous sections; and

(4) Records of monitoring required by paragraph 3.b.(10) of the previous sections and paragraph 9. of the following sections.

8. Establishment of Wastewater Treatment System Influent Action Levels

a. The mill must conduct a monitoring program, described in paragraph b. of this section, for the purpose of defining wastewater treatment system influent characteristics (or action levels), described in paragraph c. of this section, that will trigger requirements to initiate investigations on BMP effectiveness and to take corrective action.

b. The mill must employ the following procedures in order to develop the action levels required by paragraph 8. of this section;

(1) Monitoring parameters: The mill must collect 24-hour composite samples and analyze the samples for a measure of organic content (e.g., Chemical Oxygen Demand (COD) or Total Organic Carbon (TOC). Alternatively, the mill may use a measure related to spent pulping liquor losses measured continuously and averaged over 24 hours (e.g., specific conductivity or color).

(2) Monitoring locations: For direct discharges, monitoring must be conducted at the point influent enters the wastewater treatment system. For indirect dischargers monitoring must be conducted at the point of discharge to the POTW. For the purposes of this requirement, the mill may select alternate monitoring point(s) in order to isolate possible sources of spent pulping liquor, soap, or turpentine from other possible sources of organic wastewaters that are tributary to the wastewater treatment facilities (e.g., bleach plants, paper machines and secondary fiber operations).

c. By the date described in paragraph 10.a.(3) of the following sections, each existing discharger must complete an initial six-month monitoring program using the procedures specified in paragraph 8.b. of this section and must establish initial action levels based on the results of this program. A wastewater treatment influent action level is a statistically determined pollutant loading determined by a statistical analysis of six months of daily measurements. The action levels must consist of a lower action level, which if exceeded will trigger the investigation requirements described in paragraph 9. of the following section, and an upper action level, which if exceeded will trigger the corrective action requirements described in paragraph 9. of the following section.

d. By the date prescribed in paragraph 10.a.(4) of the following sections, each existing discharger must complete a second six-month monitoring program using the procedures specified in paragraph 8.b. of this section and must establish revised action levels based on the results of that program. The initial action levels shall remain in effect until replaced by revised action levels.

e. By the date prescribed in paragraph 10.b. of the following sections, each new source must complete a six-month monitoring program using the procedures specified in paragraph 8.b. of this section and must develop a lower action level and an upper action level based on the results of that program.

f. Action levels developed under this paragraph must be revised using six months of monitoring data after any change in mill design, construction, operation, or maintenance that materially affects the potential for leaks or spills of spent pulping liquor, soap, or turpentine from the immediate process areas.

9. Monitoring, Corrective Action, and Reporting Requirements

a. The mill must conduct daily monitoring of the influent to the wastewater treatment system in accordance with the procedures described in paragraph 8.b. of the previous section for the purpose of detecting leaks and spills, tracking the effectiveness of the BMPs, and detecting trends in spent pulping liquor losses.

b. Whenever monitoring results exceed the lower action level for the period of time specified in the BMP Plan, the mill must conduct an investigation to determine the cause of such exceedance. Whenever monitoring results exceed the upper action level for the period of time specified in the BMP Plan, the mill must complete corrective action to bring the wastewater treatment system influent mass loading below the lower action level as soon as practicable.

c. Although exceedances of the action levels will not constitute violations of the permit, failure to take the actions required by paragraph 9.b. of this section as soon as practicable will be a permit violation.

d. The mill must report to the Department the results of the daily monitoring conducted pursuant to paragraph 9.a. of this section. Such reports must include a summary of the monitoring results, the number and dates of exceedances of the applicable action levels, and brief descriptions of any corrective actions taken to respond to such exceedances. **Submission of the BMP exceedances shall be quarterly by the 28th day of April, July, and October. A summary of the daily monitoring results shall be submitted annually by the 28th day of January.**

10. Compliance Deadlines

a. Existing direct and indirect dischargers: Except as provided in paragraph 10.b. of this section for new sources, indirect discharging mills must meet the compliance deadlines set forth below. Except as provided in paragraph 10.b. of this section for new sources, direct discharging mills must meet the deadlines set forth below. **If a deadline set forth below has passed at the time the permit is issued, the mill must achieve compliance with the BMP requirement(s) upon the permit effective date.**

(1) **Prepare BMP Plans and certify to the Department** that the BMP Plan has been prepared in accordance with the permit and 40 CFR Part 430 not later than **April 15, 1999**;

(2) Implement **all BMPs** specified in paragraph 3. of the previous sections **that do not require the construction of containment or diversion structures or the installation of monitoring and alarm systems** not later than **April 15, 1999**.

(3) Establish initial action levels required by paragraph 8.c. of the previous sections not later than April 15, 1999.

(4) Commence operation of any new or upgraded continuous, automatic monitoring systems that the mill determines to be necessary under paragraph 3.(3) of the previous sections (other than those associated with construction of containment structures) not later than April 17, 2000.

(5) Complete construction and commence operation of any spent pulping liquor, collection, containment, diversion, or other facilities, including any associated continuous monitoring systems, necessary to fully implement BMPs specified in paragraph 3. of the previous sections not later than April 16, 2001.

(6) Establish revised action levels required by paragraph 3. of the previous sections, by not later than January 15, 2002.

b. New Sources: **Upon commencing discharge,** new sources subject to this section must **implement all of the BMPs** specified in paragraph 3. of the previous sections, **prepare the BMP Plan** required by paragraph 4. of the previous sections, **and certify to the Department** that the BMP Plan has been prepared in accordance with this permit and 40 CFR part 430 as required by paragraph 6. of the previous sections, except that the **action levels** required by paragraph 8.e. of the previous sections **must be established not later than 12 months after commencement of discharge,** based on six months of monitoring data obtained prior to that date in accordance with the procedures specified in paragraph 8.b. of the previous sections.

E. RIVER MONITORING REQUIREMENTS

River monitoring shall be conducted on a once per week basis for the period between June 1 and September 30, except during unsafe river conditions. Unsafe river conditions are when the river flow exceeds 16,000 CFS and/or when the river elevation stage exceeds 35.5 feet mean sea level (MSL) as recorded at USGS Gage 02467001 located below Demopolis Lock and Dam. River monitoring frequency will be increased to twice per week when the minimum dissolved oxygen level drops below 5.9 mg/L at any of the established monitoring locations. River monitoring frequency will be increased to once every day when the minimum dissolved oxygen level drops below 5.2 mg/L at any of the established monitoring locations. Water quality parameters to be collected shall be dissolved oxygen and temperature and should be measured at a depth of 5 feet in waters 10 feet or greater and measured at mid-depth for those waters less than 10 feet in total depth.

A river monitoring event consists of sampling at the following locations

River Mile (RM) 173.5 (above discharge), RM 170.5 (below discharge), RM 168.6, RM 167.6, RM 166.6, RM 164.6, RM 162.6, RM 160.6, RM 157.8, RM 155.5, and RM 153.3

Sample collection and analysis shall be performed in accordance with EPA approved sample collection protocol and analysis methods. The discharge authorized by this permit shall not cause a violation of the applicable dissolved oxygen criteria downstream of the discharge. The permittee shall take steps necessary to ensure that its effluent does not result in dissolved oxygen values at the five food depth being depressed below the applicable dissolved oxygen criteria as measured by the permittee, ADEM, EPA, or its successor.

In the event that and approved real time monitoring system is installed and functional, then this paragraph will only apply if there are conditions under which the monitoring system is not functional.

F. ALTERNATE REAL-TIME MONITORING

During the period June 1 through September 30, in lieu of using the BOD_5 allocation tables listed in Part I of this permit, a real-time monitoring program utilizing the simplified tiered BOD_5 allocation table listed below may be used. In order to utilize this option, the permittee shall submit a monitoring implementation plan to ADEM for approval that utilizes the existing Hwy 114 USGS monitoring point (upstream of the discharge), and establishes an additional downstream USGS real-time monitoring station(s) in order to monitor the potential impacts of the mill's discharge and to ensure applicable dissolved oxygen and temperature criteria are being attained. The monitoring plan will provide a comparison to in-stream monitoring data from at least one summer season utilizing in-stream sondes or other approved monitoring to collect additional data to further relate the established monitoring station(s) to the sag point. The downstream real-time monitoring station(s) will replace Part IV.E of this permit.

Following ADEM approval of the monitoring plan, the following tiered BOD_5 allocation table will be utilized on a 24-hour average dissolved oxygen (as measured at TBD monitoring point) in lieu of the allocation table listed beginning on page 3 of this permit.

Dissolved Oxygen, 24-Hour Average (mg/L)	% reduction of daily allocation	Daily Allocation	Max Allocation
<5.0	85	3536	6789
5.0-5.9	70	7072	13577
6.0-6.3	50	11786	22629
6.4-7.0	30	16500	31681
>7.0	0	23574	45258

Oxygen offsets and BOD netting may still be used as described on page 2 of this permit to achieve the allocations listed above.

If a malfunction in the monitoring instrument occurs, then the previous day's average dissolved oxygen value may be used if the flow and temperature values of the river are within +/-5 percent of the previous day's average for each of these parameters.. If the flow and temperature are not within +/-5 percent of the previous day's results, then the permittee shall conduct a river survey as set forth in Part IV.E of this permit.

In order to protect river quality, oxygen will be added in the event that the downstream water quality monitor detects a dissolved oxygen value of 4.5 mg/L or less. Oxygen will continue to be added until such time as the dissolved oxygen is 5 mg/L or more.

G. COOLING WATER INTAKE STRUCTURE (CWIS) REQUIREMENTS

1. The cooling water intake structure used by the permittee has been evaluated using available information. At this time, the Department has determined that the cooling water intake structure represents the best technology available (BTA) to minimize adverse environmental impact in accordance with Section 316(b) of the Federal Clean Water Act (33 U.S.C. section 1326).

2. The permittee shall submit the following information at least 180 days prior to expiration of the permit:

   a. design intake flow of the CWIS

   b. percentage of intake flow, based on highest monthly average in last 5 years, used for cooling purposes;

   c. an estimate of the intake flow reduction at the facility based upon the use of a 100 percent (or some lesser percentage) closed-cycle re-circulating cooling water system compared to a conventional once-through cooling water system

   d. through screen design intake flow velocity

   e. any impingement and entrainment data that may have been collected based on the operation of the facility's CWIS, collected since the effective date of this NPDES permit

   f. a detailed description of any changes in the operations of the CWIS, or changes in the type of technologies used at the CWIS such as screens or other technologies affecting the rates of impingement and/or entrainment of fish and shellfish

3. The permittee is required to operate and maintain the CWIS in a manner that minimizes impingement and entrainment levels. Documentation detailing the steps that have and are being taken to minimize the impingement and entrainment levels shall be maintained on site and made available upon request.

H. REQUIRED TEST METHODS AND MINIMUM LEVELS FOR INTERNAL BLEACH PLANT MONITORING AND REPORTING

Parameter	Test Method	Minimum Level[5]
TCDD[3]	1613	10 pg/L
TCDF[4]	1613	10 pg/L
Chloroform	601[1]	0.5 µg/L[2]
Trichlorosyringol	1653	2.5 µg/L
3,4,5-Trichlorocatechol	1653	5.0 µg/L
3,4,6-Trichlorocatechol	1653	5.0 µg/L
3,4,5-Trichloroguiaiacol	1653	2.5 µg/L
3,4,6-Trichloroguaiacol	1653	2.5 µg/L
4,5,6-Trichloroguaiacol	1653	2.5 µg/L
2,4,5-Trichlorophenol	1653	2.5 µg/L
2,4,6-Trichlorophenol	1653	5.0 µg/L
Tetrachlorocatechol	1653	5.0 µg/L
Tetrachloroguaiacol	1653	5.0 µg/L
2,3,4,6-Tetrachlorophenol	1653	2.5 µg/L
Pentachlorophenol	1653	5.0 µg/L
AOX	1650	20 µg/L

[1]Or other method as approved in 40 CFR 136.

[2]An ML for chloroform was not promulgated in the Cluster Rules. The value in this permit is considered a matrix specific ML typical of levels achieved in papermill effluents as demonstrated through NCASI studies.

[3]TCDD means 2,3,7,8-tetrachlorodibenzo-p-dioxin.

[4]TCDF means 2,3,7,8-tetrachlorodibenzo-p-furan.

[5]Minimum level means the level at which the analytical system gives recognizable signals and an acceptable calibration point.

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
WATER DIVISION – INDUSTRIAL AND MUNICIPAL SECTIONS
NONCOMPLIANCE NOTIFICATION FORM

PERMITTEE NAME: _____ PERMIT NO: _____

FACILITY LOCATION: _____

DMR REPORTING PERIOD: _____

1. DESCRIPTION OF DISCHARGE: (Include outfall number (s))

2. DESCRIPTION OF NON-COMPLIANCE: (Attach additional pages if necessary):

LIST EFFLUENT VIOLATIONS (If applicable)			
Outfall Number (s)	NONCOMPLIANCE PARAMETER(S)	Result Reported (Include units)	Permit Limit (Include units)
LIST MONITORING / REPORTING VIOLATIONS (If applicable)			
Outfall Number (s)	NONCOMPLIANCE PARAMETER(S)	Monitoring / Reporting Violation (Provide description)	

3. CAUSE OF NON-COMPLIANCE (Attach additional pages if necessary):

4. PERIOD OF NONCOMPLIANCE: (Include exact date(s) and time(s) or, if not corrected, the anticipated time the noncompliance is expected to continue):

5. DESCRIPTION OF STEPS TAKEN AND/OR BEING TAKEN TO REDUCE OR ELIMINATE THE NONCOMPLYING DISCHARGE AND TO PREVENT ITS RECURRENCE (attach additional pages if necessary):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

_____
NAME AND TITLE OF RESPONSIBLE OFFICIAL (type or print)

_____/_____
SIGNATURE OF RESPONSIBLE OFFICIAL / DATE SIGNED

ADEM Form 421 09/05

ADEM PERMIT RATIONALE

PREPARED DATE: October 11, 2016
PREPARED BY: Alexander Chavers

Permittee Name:	Georgia-Pacific Consumer Products LP
Facility Name:	Georgia-Pacific Consumer Products LP – Naheola Mill
Permit Number:	AL0003301

PERMIT IS REISSUANCE DUE TO EXPIRATION

DISCHARGE SERIAL NUMBERS & DESCRIPTIONS:

DSN001:	Treated process wastewater, sanitary wastewater, landfill leachate and storm water runoff associated with the production of pulp and paper
DSN002:	Storm water runoff from non-process areas and storm water from Borrow Pit A
DSN003:	Storm water runoff from non-process areas
DSN01A:	A-Line (Hardwood) Bleach Plant internal requirements
DSN01B:	B-Line (Softwood) Bleach Plant internal requirements
DSN01C:	Storm water runoff from Borrow Pit B

INDUSTRIAL CATEGORY: 40 CFR 430 Subpart B – Bleached Papergrade Kraft and Soda Subcategory

MAJOR: Y

STREAM INFORMATION:

Receiving Stream:	Tombigbee River
Classification:	Fish & Wildlife
River Basin:	Tombigbee River Basin
7Q10:	1005 CFS
7Q2:	1790 CFS
1Q10:	753 CFS
Annual Average Flow:	25,621 CFS
303(d) List:	NO
Impairment:	N/A
TMDL:	NO

DISCUSSION:
Georgia Pacific – Naheola Mill is an integrated pulp and paper mill with hardwood and softwood pulping lines.

ADEM Administrative Rule 335-6-10-.12 requires applicants to new or expanded discharges to Tier II waters demonstrate that the proposed discharge is necessary for important economic or social development in the area in which the waters are located. The application submitted by the facility is not for a discharge to a Tier II water body. Therefore, anti-degradation requirements do not apply.

01B1:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	BPJ

01BQ:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Chloroform	4.95 lbs/day	8.28 lbs/day	-	-	-	Quarterly	Grab6	EGL
Chloroform	5.97 lbs/day	9.99 lbs/day	-	-	-	Quarterly	Grab6	EGL

01BS:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
2,4,6-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
2,3,7,8 Tetrachlorodibenzofuran (TCDF)	-	-	-	-	31.9 pg/l	Semi-Annually	Composite	EGL
Pentachlorophenol	-	-	-	-	**4.9999** ug/l	Semi-Annually	Composite	EGL
3,4,6-Trichloroguaiacol	-	-	-	-	**2.4999** ug/l	Semi-Annually	Composite	EGL
3,4,6-Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
2,4,5-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
3,4,5-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
3,4,5 Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Tetrachloroguaiacol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Tetrachlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Trichlorosyringol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
4,5,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
2,3,4,6-Tetrachlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
TCDD Equivalents	-	-	-	-	9.9999 pg/l	Semi-Annually	Composite	EGL

01AS:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
2,4,6-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
2,3,7,8 Tetrachlorodibenzofuran (TCDF)	-	-	-	-	31.9 pg/l	Semi-Annually	Composite	EGL
Pentachlorophenol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
3,4,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
3,4,6-Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
2,4,5-Trichlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
3,4,5-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
3,4,5 Trichlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Tetrachloroguaiacol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Tetrachlorocatechol	-	-	-	-	4.9999 ug/l	Semi-Annually	Composite	EGL
Trichlorosyringol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
4,5,6-Trichloroguaiacol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
2,3,4,6-Tetrachlorophenol	-	-	-	-	2.4999 ug/l	Semi-Annually	Composite	EGL
TCDD Equivalents	-	-	-	-	9.9999 pg/l	Semi-Annually	Composite	EGL

01A1:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	BPJ

01AQ:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Chloroform	9.56 lbs/day	15.99 lbs/day	-	-	-	Quarterly	Grab6	EGL
Chloroform	10.02 lbs/day	16.75 lbs/day	-	-	-	Quarterly	Grab6	EGL

0011:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
BOD, 5-Day (20 Deg. C)	23574 lbs/day	45318 lbs/day	-	-	-	5X Weekly	24-Hr Composite	EGL/WQ BEL
BOD, 5-Day (20 Deg. C)	0 lbs/day	0 lbs/day	-	-	-	5X Weekly	24-Hr Composite	WQBEL
pH	-	-	6.0 S.U.	-	9.0 S.U.	5X Weekly	Grab	EGL/BPJ
Solids, Total Suspended	43098 lbs/day	80166 lbs/day	-	-	-	5X Weekly	24-Hr Composite	EGL
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Continuous	Totalizer	BPJ

001S:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
2,3,7,8-Tetrachlorodibenzo-P-Dioxin	-	0.00000216 lbs/day	-	-	REPORT ppq	Semi-Annually	Composite	EGL

001Y:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Pentachlorophenol	-	5.33 lbs/day	-	-	-	Annually	Composite	EGL
Trichlorophenol	-	33.3 lbs/day	-	-	-	Annually	Composite	EGL

001T:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Toxicity, Ceriodaphnia Chronic	-	0 pass(0)/fail(1)	-	-	-	Annually	24-Hr Composite	WQBEL
Toxicity, Pimephales Chronic	-	0 pass(0)/fail(1)	-	-	-	Annually	24-Hr Composite	WQBEL

001X:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*

Halogens, Adsorbable Organic	2407 lbs/day	3675 lbs/day	-	-	-	Once/2 Weeks	24-Hr Composite	EGL
Halogens, Adsorbable Organic	2185 lbs/day	3335 lbs/day	-	-	-	Once/2 Weeks	24-Hr Composite	EGL

002S:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Turbidity	-	-	-	-	REPORT NTU	Semi-Annually	Grab	BPJ
BOD, 5-Day (20 Deg. C)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	BPJ
Solids, Total Suspended	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Solids, Settleable	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Cadmium, Total (As Cd)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Chromium, Total (As Cr)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Copper, Total (As Cu)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	BPJ
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	BPJ
Solids, Total Dissolved (TDS)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ

002Y:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Chemical Oxygen Demand (COD)	-	-	-	-	REPORT mg/l	Annually	Grab	BPJ

003S:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
BOD, 5-Day (20 Deg. C)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	BPJ

Solids, Total Suspended	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	BPJ
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	BPJ

01CY:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Chemical Oxygen Demand (COD)	-	-	-	-	REPORT mg/l	Annually	Grab	BPJ

01CS:

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Turbidity	-	-	-	-	REPORT NTU	Semi-Annually	Grab	BPJ
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	BPJ
Solids, Settleable	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Cadmium, Total (As Cd)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Chromium, Total (As Cr)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Copper, Total (As Cu)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ
Oil and Grease	-	-	-	-	15 mg/l	Semi-Annually	Grab	BPJ
Flow, In Conduit or Thru Treatment Plant	-	REPORT MGD	-	-	-	Semi-Annually	Estimate	BPJ
Solids, Total Dissolved (TDS)	-	-	-	-	REPORT mg/l	Semi-Annually	Grab	BPJ

*Basis for Permit Limitation

- BPJ – Best Professional Judgment
- WQBEL – Water Quality Based Effluent Limits
- EGL – Federal Effluent Guideline Limitations
- 303(d) – 303(d) List of Impaired Waters
- TMDL – Total Maximum Daily Load Requirements

Discussion
The facility is an integrated bleach kraft mill producing market pulp, paper board, and paper products (tissue). Manufacturing operations include wood processing, pulping, bleaching, power and steam generation, chemical recovery, paper machine operation, and roll finishing and sheeting. The bleach process used by this mill is not totally chlorine-free (TCF) as defined by the guidelines. However, the bleach process, which uses chlorine dioxide, is elemental chlorine-free (ECF) as defined by the guidelines.

DSN01A – A-Line (Hardwood) Bleach Plant Internal Requirements
DSN01B – B-Line (Softwood Bleach Plant Internal Requirements
As specified in 40 CFR 430.24, monitoring requirements are imposed on each fiber line not using an exclusively TCF bleaching process. The previous permit organized the internal monitoring requirements into two production tiers for chloroform and AOX limitations. This tier-based approach will be continued in this permit issuance. The final limitations are the most stringent of the existing limitations and the limitations calculated from productions provided in the application. All effluent calculations can be seen in Attachment A to this rationale.

Sampling Locations*
Samples collected to comply with the monitoring requirements shall be at the nearest accessible location after each bleaching stage and prior to acid and alkaline filtrates comingling. The sample locations proposed by the mill for both the A and B lines are as follows:

- A-1 – Sample filtrate from E-filtrate tank (alkaline stage)
- A-2 – Sample filtrate from D/C filtrate tank (acid stage)
- B-1 – Sample filtrate at point downstream of D1 Seal Tank, D2 Seal Tank, and CL2 Seal Tank (acid stage)
- B-2 – Sample filtrate at point downstream of B1 Plant Scrubber and E/O Seal Tank (alkaline stage)

*To prevent the loss of chloroform through air stripping as the samples are collected, measured, and composited or through chemical reaction when the acid and alkaline sample is combined, the mill will sample acid and alkaline lines separately. A previously approved approach of manually compositing the acid and alkaline stages will be continued in this permit issuance and will be outlined in Part I.A of the permit.

TCDD, Chlorinated Phenolics
These parameters are regulated under 40 CFR 430.24. The daily maximum limitations for TCDD (2,3,7,8-tetrachlorodibenzo-p-dioxin) and chlorinated phenolics are expressed as less than the minimum level of detection specified at 40 CFR 430.01(i). No monthly average limitations are imposed for these parameters.

TCDF
The daily maximum for TCDF (2,3,7,8-tetrachlorodibenzofuran) imposed by the guidelines is 31.9 picograms per liter (pg/L). No monthly average limitation is imposed for this parameter.

AOX
This parameter is regulated under 40 CFR 430.24(a)(1) and has limitations for fiber lines not using an exclusively TCF bleaching process. The previous permit included two production-based tiers for AOX and this approach will be continued in this permit issuance. The two tiers are as follows:

- Greater than 1785 air dried metric tons per day
- Less than 1785 air dried metric tons per day

Chloroform
The daily maximum for chloroform is expressed as 6.92 g/kkg and 4.14 g/kkg for the daily maximum and monthly average, respectively. Each fiber line is broken into two production tiers as follows:

- A-Line → Greater than 1100 air dried metric tons per day (1,097 tons/day production basis)
- A-Line → Less than 1100 air dried metric tons per day (1,048 tons/day production basis)
- B-Line → Greater than 685 air dried metric tons per day (655 tons/day production basis)
- B-Line → Less than 685 air dried metric tons per day (543 tons/day production basis)

Flow
Flow will continue to be monitored continuously using a totalizer and reported *once per quarter* with the chloroform monitoring result.

Monitoring Frequencies
The facility has requested a reduction in the frequency of monitoring of these internal outfalls. Based on the facility's historical data and compliance history in conjunction with EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies*, the Department is proposing to reduce the monitoring frequencies as follows: AOX monitoring is being reduced from once per week to *biweekly*. Chloroform monitoring is reduced from once per month to *once per quarter*. Chlorinated phenolics, TCDD, and TCDF monitoring is reduced from once per quarter to *semi-annually*.

DSN001 – Treated process wastewater, sanitary wastewater, landfill leachate and storm water runoff associated with the production of pulp and paper

Water Quality Based Effluent Limitations (WQBEL)
It has been shown during previous permit issuances that the receiving stream is water quality limited for dissolved oxygen during the period from May 1 to October 31. During these periods, water quality based effluent limitations will be applied to the stream to ensure the water quality of the receiving stream is maintained.

pH
ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09(5)(e)2 – Specific Water Quality for Fish & Wildlife classified streams states: "Sewage, industrial waste or other wastes shall not cause the pH to deviate more than one unit from then normal or natural pH, nor be less than 6.0, nor greater than 8.5 standard units." During the previous permit issuance, the facility was permitted to discharge at between 6.0 and 9.0 S.U. due to the low impact of the facility's discharge pH on the receiving stream. These requirements will be continued in this permit issuance.

TCDD
TCDD (2,3,7,8-tetrachloro-dibenzo-p-dixoin) is limited internally at DSN01A and DSN01B by the effluent guideline limitations found at 40 CFR 430.24. At the final outfall, water quality based effluent limitations based on the Human Health Criteria will be applied. The in-stream water quality standard for Human Health Criteria (Fish Consumption) is $2.7x10^{-8}$ µg/L. This limitation will be production-weighted between WestRock Mill Company (formerly Rock-Tenn Co.) and the facility and will be applied on a mass basis. Monitoring is required *once per year*.

Georgia Pacific Naheola Production:	1769.15 tons/day
WestRock Mill Company Production*:	1279 tons/day
Annual Average Flow:	25621 CFS/16559 MGD

$$TCDD\left(\frac{lbs}{day}\right) = \frac{\left(2.7x10^{-8}\frac{\mu g}{L}\right)\left(\frac{1\ mg}{1000\ \mu g}\right)(8.34)(16559\ MGD)(1769.15\frac{tons}{day})}{(1769.15\frac{tons}{day} + 1279\frac{tons}{day})}$$
$$= 0.00000216\ lbs/day$$

*Production values for WestRock Mill Company are taken from the most recent issuance of NPDES Permit AL0002828 made effective on July 1, 2014.

Biochemical Oxygen Demand (5-Day) (BOD_5) (June 1 to September 30)*
Historical river monitoring has shown that the sag point from WestRock Mill Company, which is upstream of Georgia Pacific – Naheola, occurs at some point downstream of this facility's discharge. Through extensive modeling, which includes stream flow data through 1993, the permit has previously included a BOD allocation table based on both the flow and temperature of the receiving stream.

This table provides acceptable daily allocations of BOD_5 for the facility to ensure that the minimum in-stream D.O. of 5 mg/L is met below Beach Bluff at mile 138 of the Tombigbee River. From the Demopolis Lock and Dam to Beach Bluff, the D.O. water quality standard level is 4.0 mg/L. The proportion of total allocation

for the facility is based on production and was previously agreed upon by WestRock Mill Company and the facility.

This permit issuance will continue the requirements to determine the daily allowable BOD_5 limit by looking up the value that corresponds to the previous day's flow at USGS gage 02467000 located at the Demopolis Lock and Dam and the [present]/[previous] day's temperature at USGS Gage 02469525 located at Highway 114 (River Mile 173.4) or from the WestRock Mill Company sntake structure.. In addition, the facility has previously been allowed to comply with the BOD_5 limit by injecting additional oxygen into the river to offset the effects. This allowance will be continued in this permit issuance with 4.2 lbs of oxygen being required to offset 1 lb BOD_5.

$$Net\ BOD_5 = BOD_5(discharged) - \frac{lbsO_2(injected)}{4.2}$$

Compliance with the daily maximum requirements will be met as long as the Net BOD_5 does not exceed the allowable BOD_5 for any given day multiplied by a factor of 1.92. The use of this factor is to be consistent with the ratio of daily max/daily average from the BPT guidelines. The monthly average limit is the monthly average of the BOD_5 limitations.

NOTE: At no time may the discharge exceed the limits calculated based on effluent guidelines.

**These seasonal limitations are only required during the months of June 1 to September 30, reduced from May 1 to October 31, to coincide with the changes to the river monitoring decision by ADEM's Water Quality Division.*

Chronic Toxicity

In order to evaluate the whole effluent toxicity, chronic toxicity monitoring requirements will be continued in this permit issuance. Chronic toxicity monitoring is appropriate based on the stream's use classification and the ratio of flow in the receiving stream at low flow conditions to the effluent flow being less than 100:1. The existing in-stream waste concentration (IWC) of 8% will be continued in this permit issuance and monitoring will continue to be required *once per year*.

Federal Effluent Guideline Limitations (EGL)*

The wastewater from this facility is regulated under 40 CFR 430 Subpart B. The production data used is the annual average production divided by the number of operating days as specified by EPA guidelines. The final limitations are the most stringent of the existing limitations and the limitations calculated using the productions reported in the application. All effluent calculations can be seen in Attachment A to this rationale.

Chemical Oxygen Demand (COD)

COD is included in 40 CFR 430; however, no limitations were promulgated by EPA during the issuance of the final rule. In the absence of limitations, the Department proposes to reserve monitoring and limitations for this parameter for this permit issuance. Effluent data submitted under this permit can be used to develop permit limitations in the future, if necessary.

Biochemical Oxygen Demand (5-Day) (BOD_5)

These BOD_5 limitations are based directly on the effluent guideline limitations found at 40 CFR 430.22(a) and are effective year round.

The calculated effluent guidelines are higher than the previous permit limitations. A review of the facility's historical data shows that the facility has the ability to meet the current limitations; therefore, these limitations will be continued in this permit issuance.

Total Suspended Solids

This parameter is regulated under 40 CFR 430 and is based on production. The calculated effluent guidelines are higher than the previous permit limitations. A review of the facility's historical data shows that the facility has the ability to meet the current limitations; therefore, these limitations will be continued in this permit issuance.

Pentachlorophenol, Trichlorophenol

These parameters are regulated under 40 CFR 430 and only include a daily maximum limitation. As specified in 40 CFR 430.22(d), these limitations will not apply if the facility certifies non-use of chlorophenolics. In the event that the limitations do not apply, the facility should submit the monitoring report as specified in the permit with a value of "*9" or "NODI=9" for conditional monitoring for each applicable parameter.

Cooling Water Intake Structure (CWIS)

Section 316(b) of the Clean Water Act requires that facilities minimize adverse environmental impacts resulting from the operation of cooling water intake structures (CWIS) by using the "best technology available" (BTA). U.S. EPA has promulgated rules to implement these requirements under Phase I, Phase II, and Phase III of the rules; however, many facilities that operate intake structures do not fall into these categories and are classified as miscellaneous facilities. For these miscellaneous facilities, a BTA determination must be made using BPJ. For this facility, a BTA determination was made due to the intake withdrawal volume being less than 5% of the mean annual average flow, the facility using less than 25% for cooling purposes, and the through screen velocity is 0.25 ft/s.

The requirements that facilities must comply with are listed below:

1. The permittee shall submit the following information at least 180 days prior to expiration of this permit:

    - design in-take flow of the CWIS;
    - percentage of in-take flow, based on highest monthly average in last 5 years, used for cooling purposes;
    - an estimate of the in-take flow reduction at the facility based upon the use of a 100 percent (or some lesser percentage) closed-cycle re-circulating cooling water system compared to a conventional once-through cooling water system;
    - through screen design in-take flow velocity;
    - any impingement and entrainment data that may have been collected based on the operation of the facility's CWIS, collected since the effective date of this NPDES permit; and,
    - a detailed description of any changes in the operation of the CWIS, or changes in the type of technologies used at the CWIS such as screens or other technologies affecting the rates of impingement and/or entrainment of fish and shellfish.

2. The permittee is required to operate and maintain the CWIS in a manner that minimizes impingement and entrainment levels. Typical activities that may satisfy this requirement include but are not limited to:

    - Routine inspection, maintenance, and replacement prior to the end of the useful service life of mechanical equipment associated with the CWIS;
    - Underwater inspection of critical components required to maintain functionality and biological effectiveness; or
    - Velocity monitoring and maintaining or achieving an intake velocity of less than 0.5 ft/s.

Dioxin Monitoring and Analysis Requirements

Fish tissue monitoring for dioxin below paper mills has been discontinued by the Department and the requirement is being removed from this permit issuance.

River Monitoring Requirements (June 1 to September 30)

After discussions with the Water Quality division, the river monitoring period has been reduced from May 1 to October 31 to the period from June 1 to September 30. This reduction should still allow the collection of relevant data during the critical river flows and temperatures. In addition, the facility will only be required to collect dissolved oxygen and temperature data from each of the monitoring stations.

In addition, the Department has agreed to include an option for the permittee to develop a real-time monitoring plan. Such a plan would allow the facility to reduce its river monitoring requirements and simplify the compliance with Biochemical Oxygen Demand (5-Day) limitations. In order to implement this plan, the facility must submit

an implementation plan to the Department for approval that utilizes the upstream USGS monitoring station and establishes 1 or more additional USGS real-time monitoring stations downstream of the facility's discharge.

Full requirements for both river monitoring and the alternate real-time monitoring can be found in Part IV.E and Part IV.F of the permit.

DSN01C – Storm water runoff from Borrow Pit B

Stormwater draining through this outfall is from future de-watered sludge/ash storage area and access road runoff. The storm water is discharged to the polishing pond of the wastewater treatment system before eventually discharging at DSN001. Monitoring at this outfall was added in 2006 due to the facility's expected reclamation of the pit using a manufactured soil consisting of wood boiler ash and solids (primarily cellulose) from the mill's wastewater treatment system.

Monitoring requirements for this outfall at that time were based on the NPDES General Permit ALG160000 for Landfills using Best Professional Judgment. These monitoring requirements will be continued in this permit issuance.

Flow

Flow monitoring will continue to be required to evaluate the volume of storm water entering the mill's polishing pond through this outfall.

pH, Chemical Oxygen Demand, Total Cadmium, Total Copper, Total Chromium, Oil & Grease, Settleable Solids, Total Dissolved Solids, Turbidity

Consistent with the previous BPJ requirements, these parameters will continue to be required to be monitored *semi-annually* with the exception of Chemical Oxygen Demand, which should be monitored *annually*. Settleable Solids and Tubidity are only required to be sampled *when construction activities are occurring*. A daily maximum limitation of 15.0 mg/L for Oil & Grease will be imposed to prevent the discharge from impacting the quality of water in the polishing pond.

DSN002 – Storm water runoff from non-process areas and storm water from Borrow Pit A*

DSN003 – Storm water runoff from non-process areas*

DSN002 and DSN003 were deemed representative of the storm water outfalls at the facility in previous permit issuances and this designation will be continued.

Storm water runoff associated with pulp and paper manufacturing operations has the potential to contain pollutants resulting from open storage of wood, wood chips, wood refuse poles, sawdust, coal, drips or spills in uncovered storage areas, and operation/maintenance of vehicles and equipment.

Flow

Flow reporting is continued in this permit issuance to evaluate the volume of storm water discharging to the receiving stream.

pH, Biochemical Oxygen Demand (5-Day), Total Suspended Solids

Monitoring requirements will be continued in this permit issuance for these parameters. The discharge is not expected to adversely affect the receiving stream and these parameters can be used as a measure of the effectiveness of the facility's BMPs.

Oil & Grease

A daily maximum of 15 mg/l will be continued in this permit issuance for Oil & Grease. This limitation has been shown to prevent sheen and be protective of the receiving stream and has been shown to be achievable through the use of BMPs.

Addition Requirements at DSN002

During the 2006 modification of the permit, the facility requested to include the discharge from Borrow Pit A in to the monitoring requirements for DSN002. As with DSN001C, the additional monitoring requirements are based on NPDES General Permit ALG160000 for Landfills using Best Professional Judgment. The additional parameters required to be monitored at DSN002 are **Chemical Oxygen Demand**, **Total Cadmium**, **Total Chromium**, **Total Copper**, **Settleable Solids**, **Total Dissolved Solids**, and **Turbidity**.

*All parameters are required to be sampled and reported *semi-annually* with the exception of Chemical Oxygen Demand, which is required to be sampled and reported *annually*.

Best Management Practices (BMPs) are believed to be the most effective way to control the contamination of stormwater from areas of industrial activities. This facility is required to maintain a BMP plan. The requirements of the BMP plan call for minimization of stormwater contact with waste materials, products and by-products, and for prevention of spills or loss of fluids from equipment maintenance activities. The effectiveness of the BMPs will be measured through the monitoring of the pollutants of concern.

DSN001: Cluster Rule Calculations

2010 Renewal Application

40 CFR 430 - Pulp and Paper Production Point Source Category

Subpart B - Bleached Papergrade Kraft and Soda Subcategory

40 CFR 430.20 - Best Practicable Technology (BPT) /Best Conventional Technology (BCT)

Bleached Kraft Tissue & Board

Off-the-machine production and Tissue: 1,623 tons/day; 3,245,675 lbs/day — Reported in Form 2C of the application

40 CFR 430.22(a) - BPT Effluent limitations for bleached kraft facilities where paperboard, coarse paper, and tissue paper are produced

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
BOD_5	13.65	7.1	44303	23044
TSS	24.0	12.9	77896	41869
40 CFR 430.24 - Supplemental BAT effluent limitations for bleached kraft facilities where paperboard, coarse paper, and tissue paper are produced				
Pentachlorphenol	0.0016	-	5.19	-
Trichlorophenol	0.010	-	32.46	-

Bleached Market Kraft Pulp

Off-the-machine production: 196 tons/day; 392,884 lbs/day — Reported in Form 2C of the application

40 CFR 430.22(a) BPT Effluent limitations for bleached kraft facilities where market pulp is produced

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
BOD_5	15.45	8.05	6070	3163
TSS	30.4	16.4	11944	6443
40 CFR 430.24 Supplemental BAT effluent limitations for bleached kraft facilities where market pulp is produced				
Pentachlorophenol	0.0019	-	0.75	-
Trichlorophenol	0.012	-	4.71	-

Total Effluent Guideline Allocations

Pollutant	Cluster Limitations	
	Daily Maximum (lbs/day)	*Monthly Average (lbs/day)*
BOD_5	50374	26207
TSS	89840	48313
40 CFR 430.24 Supplemental BAT effluent limitations for bleached kraft facilities where market pulp is produced		
Pentachlorphenol	5.94	-
Trichlorophenol	37.2	-

40 CFR 430.24(a)(1) Best Available Technology (BAT) Requirements for Each Fiber Line not Using an Exclusively TCF Bleaching Process

Total Operating Days (A-Line/B-Line)	355	days
A-Line (Hardwood) Bleachery Total Air Dried Metric Tons (10% moisture) of Brownstock	1,225	air dried metric tons/year (Permit Effective date October 1, 2000)
Greater than 1100 Air Dried Metric Tons/Day applicable production (2007 permit)	1,097,931	kg/day
Less than 1100 Air Dried Metric Tons/Day applicable production (2007 permit)	1,048,114	kg/day
B-Line (Softwood) Bleachery Total Air Dried Metric Tons (10% moisture) of Brownstock	579	air dried metric tons/year (Permit Effective date October 1, 2000)
Greater than 685 Air Dried Metric Tons/Day applicable production (2007 permit)	654,826	kg/day
Less than 685 Air Dried Metric Tons/Day applicable production (2007 permit)	542,738	kg/day

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
AOX (Greater than 1785 ADMT/day)	0.951	0.623	3675	2407
AOX (Less than 1785 ADMT/day)	0.951	0.623	3335	2185
COD	-	-	-	-

A-Line (Hardwood) Bleachery Internal Limitations

Pollutant	Cluster Guideline Factor		Cluster Limitations	
	Doily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum*	*Monthly Average*
TCDD	n/a	n/a	<10 pg/L	n/a
TCDF	n/a	n/a	31.9 pg/L	n/a
Chloroform (Greater than 1100 ADMT/day)	6.92	4.14	16.7500	10.0210
Chloroform (Less than 1100 ADMT/day)	6.92	4.14	15.9900	9.5663
Trichlorosyringol	n/a	n/a	<2.5 ug/L	n/a
3,4,5-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,6-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,5-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
3,4,6-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
4,5,6-trichloroguiaiacol	n/a	n/a	<2.5 ug/L	n/a
2,4,5-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
2,4,6-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
Tetrachlorocatecol	n/a	n/a	<5.0 ug/L	n/a
Tetrachloroguiaiacol	n/a	n/a	<5.0 ug/L	n/a
2,3,4,6-tetrachlorophenol	n/a	n/a	<2.5 ug/L	n/a
Pentachlorophenol	n/a	n/a	<5.0 ug/L	n/a

B-Line (Softwood) Bleachery Internal Limitations

Pollutant	Cluster Guideline Factor		Cluster Limitations	
	Doily Maximum (g/1000 kgs product)	*Monthly Average (g/1000 kgs product)*	*Daily Maximum*	*Monthly Average*
TCDD	n/a	n/a	<10 pg/L	n/a
TCDF	n/a	n/a	31.9 pg/L	n/a
Chloroform (Greater than 685 ADMT/day)	6.92	4.14	9.99	5.98
Chloroform (Less than 685 ADMT/day)	6.92	4.14	8.28	4.95
Trichlorosyringol	n/a	n/a	<2.5 ug/L	n/a
3,4,5-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,6-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,5-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
3,4,6-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
4,5,6-trichloroguiaiacol	n/a	n/a	<2.5 ug/L	n/a
2,4,5-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
2,4,6-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
Tetrachlorocatecol	n/a	n/a	<5.0 ug/L	n/a
Tetrachloroguiaiacol	n/a	n/a	<5.0 ug/L	n/a
2,3,4,6-tetrachlorophenol	n/a	n/a	<2.5 ug/L	n/a
Pentachlorophenol	n/a	n/a	<5.0 ug/L	n/a

DSN001: Cluster Rule Calculations

2007 Modification

40 CFR 430 - Pulp and Paper Production Point Source Category

*BOD, TSS, and Chlorophenolic limitations in this permit were based off of the permit modification made effective October 2, 1997.
*AOX and Chloroform limitations in this permit were based off of the permit issuance made effective October 1, 2000.

Subpart B - Bleached Papergrade Kraft and Soda Subcategory
40 CFR 430.20 - Best Practicable Technology (BPT) /Best Conventional Technology (BCT)

Bleached Kraft Tissue & Board

Off-the-machine production and Tissue — 1,575 tons/day (carried forward from permit modification made effective October 2, 1997)
3,150,000 lbs/day

40 CFR 430.22(a) - BPT Effluent limitations for bleached kraft facilities where paperboard, coarse paper, and tissue paper are produced

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
BOD_5	13.65	7.1	42998	22365
TSS	24.0	12.9	75600	40635
40 CFR 430.24 - Supplemental BAT effluent limitations for bleached kraft facilities where paperboard, coarse paper, and tissue paper are produced				
Pentachlorphenol	0.0016	-	5.04	-
Trichlorophenol	0.010	-	31.50	-

Bleached Market Kraft Pulp

Off-the-machine production — 75 tons/day (carried forward from permit modification made effective October 2, 1997)
150,195 lbs/day

40 CFR 430.22(a) BPT Effluent limitations for bleached kraft facilities where market pulp is produced

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
BOD_5	15.45	8.05	2321	1209
TSS	30.4	16.4	4566	2463
40 CFR 430.24 Supplemental BAT effluent limitations for bleached kraft facilities where market pulp is produced				
Pentachlorphenol	0.0019	-	0.29	-
Trichlorophenol	0.012	-	1.80	-

Total Effluent Guideline Allocations

Pollutant	Cluster Limitations	
	Daily Maximum (lbs/day)	*Monthly Average (lbs/day)*
BOD_5	45318	23574
TSS	80166	43098
40 CFR 430.24 Supplemental BAT effluent limitations for bleached kraft facilities where market pulp is produced		
Pentachlorophenol	5.33	-
Trichlorophenol	33.3	-

40 CFR 430.24(a)(1) Best Available Technology (BAT)
Requirements for Each Fiber Line not Using an Exclusively TCF Bleaching Process

Total Operating Days (A-Line/B-Line)	355	days
A-Line (Hardwood) Bleachery Total Air Dried Metric Tons (10% moisture) of Brownstock	373,030	air dried metric tons/year (Permit Effective date October 1, 2000)
Greater than 1100 Air Dried Metric Tons/Day	1,097,931	kg/day
Less than 1100 Air Dried Metric Tons/Day	1,048,114	kg/day
B-Line (Softwood) Bleachery Total Air Dried Metric Tons (10% moisture) of Brownstock	193,085	air dried metric tons/year (Permit Effective date October 1, 2000)
Greater than 685 Air Dried Metric Tons/Day	654,826	kg/day
Less than 685 Air Dried Metric Tons/Day	542,738	kg/day

Pollutant	Continuous Discharges		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum (lbs/day)*	*Monthly Average (lbs/day)*
AOX (Greater than 1785 ADMT/day)	0.951	0.623	3675	2407
AOX (Less than 1785 ADMT/day)	0.951	0.623	3335	2185
COD	-	-	-	-

A-Line (Hardwood) Bleachery Internal Limitations

Pollutant	Cluster Guideline Factor		Cluster Limitations	
	Daily Maximum (lbs/1000 lbs product)	*Monthly Average (lbs/1000 lbs product)*	*Daily Maximum*	*Monthly Average*
TCDD	n/a	n/a	<10 pg/L	n/a
TCDF	n/a	n/a	31.9 pg/L	n/a
Chloroform (Greater than 1100 ADMT/day)	6.92	4.14	16.7500	10.0210
Chloroform (Less than 1100 ADMT/day)	6.92	4.14	15.9900	9.5663
Trichlorosyringol	n/a	n/a	<2.5 ug/L	n/a
3,4,5-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,6-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,5-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
3,4,6-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
4,5,6-trichloroguiaiacol	n/a	n/a	<2.5 ug/L	n/a
2,4,5-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
2,4,6-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
Tetrachlorocatecol	n/a	n/a	<5.0 ug/L	n/a
Tetrachloroguiaiacol	n/a	n/a	<5.0 ug/L	n/a
2,3,4,6-tetrachlorophenol	n/a	n/a	<2.5 ug/L	n/a
Pentachlorophenol	n/a	n/a	<5.0 ug/L	n/a

B-Line (Softwood) Bleachery Internal Limitations

Pollutant	Cluster Guideline Factor		Cluster Limitations	
	Daily Maximum (g/1000 kgs product)	*Monthly Average (g/1000 kgs product)*	*Daily Maximum*	*Monthly Average*
TCDD	n/a	n/a	<10 pg/L	n/a
TCDF	n/a	n/a	31.9 pg/L	n/a
Chloroform (Greater than 685 ADMT/day)	6.92	4.14	9.990	5.977
Chloroform (Less than 685 ADMT/day)	6.92	4.14	8.280	4.954
Trichlorosyringol	n/a	n/a	<2.5 ug/L	n/a
3,4,5-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,6-trichlorocatecol	n/a	n/a	<5.0 ug/L	n/a
3,4,5-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
3,4,6-trichloroguaiacol	n/a	n/a	<2.5 ug/L	n/a
4,5,6-trichloroguiaiacol	n/a	n/a	<2.5 ug/L	n/a
2,4,5-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
2,4,6-trichlorophenol	n/a	n/a	<2.5 ug/L	n/a
Tetrachlorocatecol	n/a	n/a	<5.0 ug/L	n/a
Tetrachloroguiaiacol	n/a	n/a	<5.0 ug/L	n/a
2,3,4,6-tetrachlorophenol	n/a	n/a	<2.5 ug/L	n/a
Pentachlorophenol	n/a	n/a	<5.0 ug/L	n/a

Facility Name: Georgia Pacific - Naheola

NPDES No.: AL0003301

$$Q_d * C_d + Q_{d2} * C_{d2} + Q_s * C_s = Q_r * C_r$$

ID	Pollutant	Carcinogen "yes"	Type	Background from upstream source (C_{d2}) Daily Max	Background from upstream source (C_{d2}) Monthly Avg	Background Upstream (C_s) Daily Max	Background Upstream (C_s) Monthly Avg	Enter Max Daily Discharge as reported by Applicant ($C_{d max}$)	Enter Avg Daily Discharge as reported by Applicant ($C_{d avg}$)	Partition Coefficient (Stream / Lake)
				µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	
1	Antimony		Metals	0	0	0	0	0	0	-
2	Arsenic*,**	YES	Metals	0	0	0	0	0	0	0.574
3	Beryllium		Metals	0	0	0	0	0	0	-
4	Cadmium**		Metals	0	0	0	0	0	0	0.236
5	Chromium / Chromium III**		Metals	0	0	0	0	0	0	0.210
6	Chromium / Chromium VI**		Metals	0	0	0	0	0	0	-
7	Copper**		Metals	0	0	0	0	0	0	0.388
8	Lead**		Metals	0	0	0	0	0	0	0.467
9	Mercury**		Metals	0	0	0	0	0	0	0.000
10	Nickel**		Metals	0	0	0	0	0	0	0.505
11	Selenium		Metals	0	0	0	0	0	0	-
12	Silver		Metals	0	0	0	0	0	0	-
13	Thallium		Metals	0	0	0	0	0	0	-
14	Zinc**		Metals	0	0	0	0	0	0	0.330
15	Cyanide		Metals	0	0	0	0	0	0	-
16	Total Phenolic Compounds		Metals	0	0	0	0	0	0	-
17	Hardness (As CaCO3)		Metals	0	0	0	0	0	0	
18	Acrolein		VOC	0	0	0	0	0	0	
19	Acrylonitrile*	YES	VOC	0	0	0	0	0	0	
20	Aldrin	YES	VOC	0	0	0	0	0	0	
21	Benzene*	YES	VOC	0	0	0	0	0	0	
22	Bromoform*	YES	VOC	0	0	0	0	0	0	
23	Carbon Tetrachloride*	YES	VOC	0	0	0	0	0	0	-
24	Chlordane	YES	VOC	0	0	0	0	0	0	-
25	Clorobenzene		VOC	0	0	0	0	0	0	
26	Chlorodibromo-Methane*	YES	VOC	0	0	0	0	0	0	-
27	Chloroethane		VOC	0	0	0	0	0	0	-
28	2-Chloro-Ethylvinyl Ether		VOC	0	0	0	0	0	0	-
29	Chloroform*	YES	VOC	0	0	0	0	0	0	-
30	4,4'-DDD	YES	VOC	0	0	0	0	0	0	-
31	4,4'-DDE	YES	VOC	0	0	0	0	0	0	-
32	4,4'-DDT	YES	VOC	0	0	0	0	0	0	-
33	Dichlorobromo-Methane*	YES	VOC	0	0	0	0	0	0	-
34	1, 1-Dichloroethane		VOC	0	0	0	0	0	0	-
35	1, 2-Dichloroethane*	YES	VOC	0	0	0	0	0	0	-
36	Trans-1, 2-Dichloro-Ethylene		VOC	0	0	0	0	0	0	-
37	1, 1-Dichloroethylene*	YES	VOC	0	0	0	0	0	0	-
38	1, 2-Dichloropropane		VOC	0	0	0	0	0	0	-
39	1, 3-Dichloro-Propylene		VOC	0	0	0	0	0	0	-
40	Dieldrin	YES	VOC	0	0	0	0	0	0	-
41	Ethylbenzene		VOC	0	0	0	0	0	0	
42	Methyl Bromide		VOC	0	0	0	0	0	0	-
43	Methyl Chloride		VOC	0	0	0	0	0	0	-
44	Methylene Chloride*	YES	VOC	0	0	0	0	0	0	-
45	1, 1, 2, 2-Tetrachloro-Ethane*	YES	VOC	0	0	0	0	0	0	-
46	Tetrachloro-Ethylene*	YES	VOC	0	0	0	0	0	0	-
47	Toluene		VOC	0	0	0	0	0	0	
48	Toxaphene	YES	VOC	0	0	0	0	0	0	-
49	Tributyltins (TBT)	YES	VOC	0	0	0	0	0	0	
50	1, 1, 1-Trichloroethane		VOC	0	0	0	0	0	0	
51	1, 1, 2-Trichloroethane*	YES	VOC	0	0	0	0	0	0	-
52	Trichloroethylene*	YES	VOC	0	0	0	0	0	0	
53	Vinyl Chloride*	YES	VOC	0	0	0	0	0	0	-
54	P-Chloro-M-Cresol		Acids	0	0	0	0	0	0	-
55	2-Chlorophenol		Acids	0	0	0	0	0	0	-
56	2, 4-Dichlorophenol		Acids	0	0	0	0	0	0	-
57	2, 4-Dimethylphenol		Acids	0	0	0	0	0	0	
58	4, 6-Dinitro-O-Cresol		Acids	0	0	0	0	0	0	-
59	2, 4-Dinitrophenol		Acids	0	0	0	0	0	0	
60	4,6-Dinitro-2-methylphenol	YES	Acids	0	0	0	0	0	0	
61	Dioxin (2,3,7,8-TCDD)	YES	Acids	0	0	0	0	0	0	
62	2-Nitrophenol		Acids	0	0	0	0	0	0	-
63	4-Nitrophenol		Acids	0	0	0	0	0	0	
64	Pentachlorophenol*	YES	Acids	0	0	0	0	0	0	
65	Phenol		Acids	0	0	0	0	0	0	
66	2, 4, 6-Trichlorophenol*	YES	Acids	0	0	0	0	0	0	
67	Acenaphthene		Bases	0	0	0	0	0	0	-
68	Acenaphthylene		Bases	0	0	0	0	0	0	-
69	Anthracene		Bases	0	0	0	0	0	0	-
70	Benzidine		Bases	0	0	0	0	0	0	-
71	Benzo(A)Anthracene*	YES	Bases	0	0	0	0	0	0	
72	Benzo(A)Pyrene*	YES	Bases	0	0	0	0	0	0	
73	3, 4 Benzo-Fluoranthene		Bases	0	0	0	0	0	0	-
74	Benzo(GHI)Perylene		Bases	0	0	0	0	0	0	-
75	Benzo(K)Fluoranthene		Bases	0	0	0	0	0	0	
76	Bis (2-Chloroethoxy) Methane		Bases	0	0	0	0	0	0	
77	Bis (2-Chloroethyl)-Ether*	YES	Bases	0	0	0	0	0	0	
78	Bis (2-Chloroiso-Propyl) Ether		Bases	0	0	0	0	0	0	
79	Bis (2-Ethylhexyl) Phthalate*	YES	Bases	0	0	0	0	0	0	-
80	4-Bromophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
81	Butyl Benzyl Phthalate		Bases	0	0	0	0	0	0	-
82	2-Chloronaphthalene		Bases	0	0	0	0	0	0	-
83	4-Chlorophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
84	Chrysene*	YES	Bases	0	0	0	0	0	0	-
85	Di-N-Butyl Phthalate		Bases	0	0	0	0	0	0	-
86	Di-N-Octyl Phthalate		Bases	0	0	0	0	0	0	-
87	Dibenzo(A,H)Anthracene*	YES	Bases	0	0	0	0	0	0	-
88	1, 2-Dichlorobenzene		Bases	0	0	0	0	0	0	-
89	1, 3-Dichlorobenzene		Bases	0	0	0	0	0	0	-
90	1, 4-Dichlorobenzene		Bases	0	0	0	0	0	0	
91	3, 3-Dichlorobenzene*	YES	Bases	0	0	0	0	0	0	-
92	Diethyl Phthalate		Bases	0	0	0	0	0	0	-
93	Dimethyl Phthalate		Bases	0	0	0	0	0	0	-
94	2, 4-Dinitrotoluene*	YES	Bases	0	0	0	0	0	0	-
95	2, 6-Dinitrotoluene		Bases	0	0	0	0	0	0	-
96	1,2-Diphenylhydrazine		Bases	0	0	0	0	0	0	-
97	Endosulfan (alpha)	YES	Bases	0	0	0	0	0	0	-
98	Endosulfan (beta)	YES	Bases	0	0	0	0	0	0	-
99	Endosulfan sulfate	YES	Bases	0	0	0	0	0	0	-
100	Endrin	YES	Bases	0	0	0	0	0	0	-
101	Endrin Aldeyhide	YES	Bases	0	0	0	0	0	0	-
102	Fluoranthene		Bases	0	0	0	0	0	0	
103	Fluorene		Bases	0	0	0	0	0	0	-
104	Heptachlor	YES	Bases	0	0	0	0	0	0	-
105	Heptachlor Epoxide	YES	Bases	0	0	0	0	0	0	-
106	Hexachlorobenzene*	YES	Bases	0	0	0	0	0	0	-
107	Hexachlorobutadiene*	YES	Bases	0	0	0	0	0	0	-
108	Hexachlorocyclohexane (alpa)	YES	Bases	0	0	0	0	0	0	
109	Hexachlorocyclohexane (beta)	YES	Bases	0	0	0	0	0	0	-
110	Hexachlorocyclohexane (gamma)	YES	Bases	0	0	0	0	0	0	-
111	HexachlorocycloPentadiene		Bases	0	0	0	0	0	0	-
112	Hexachloroethane		Bases	0	0	0	0	0	0	
113	Indene(1, 2, 3-CD)Pyrene*	YES	Bases	0	0	0	0	0	0	-
114	Isophorone		Bases	0	0	0	0	0	0	-
115	Naphthalene		Bases	0	0	0	0	0	0	-
116	Nitrobenzene		Bases	0	0	0	0	0	0	-
117	N-Nitrosodi-N-Propylamine*	YES	Bases	0	0	0	0	0	0	-
118	N-Nitrosodi-N-Methylamine*	YES	Bases	0	0	0	0	0	0	-
119	N-Nitrosodi-N-Phenylamine*	YES	Bases	0	0	0	0	0	0	-
120	PCB-1016	YES	Bases	0	0	0	0	0	0	
121	PCB-1221	YES	Bases	0	0	0	0	0	0	-
122	PCB-1232	YES	Bases	0	0	0	0	0	0	
123	PCB-1242	YES	Bases	0	0	0	0	0	0	-
124	PCB-1248	YES	Bases	0	0	0	0	0	0	
125	PCB-1254	YES	Bases	0	0	0	0	0	0	-
126	PCB-1260	YES	Bases	0	0	0	0	0	0	-
127	Phenanthrene		Bases	0	0	0	0	0	0	-
128	Pyrene		Bases	0	0	0	0	0	0	-
129	1, 2, 4-Trichlorobenzene		Bases	0	0	0	0	0	0	-

53.5	Enter Q_d = wastewater discharge flow from facility (MGD)
82.77675	Q_d = wastewater discharge flow (cfs) (this value is calculated from the MGD)
0	Enter or estimated, Qd2 = background stream flow from upstream source (cfs)
1085	Enter 7Q10, Q_s = background stream flow in cfs above point of discharge
753.75	Enter or estimated, 1Q10, Q_s = background stream flow in cfs above point of discharge (1Q10 estimated at 75% of 7Q10)
0	Enter flow from upstream discharge Qd2 = background stream flow in MGD above point of discharge
25421	Enter Mean Annual Flow, Q_s = background stream flow in cfs above point of discharge
1700	Enter 7Q2, Q_s = background stream flow in cfs above point of discharge (For LWF class streams)
Enter for Lake	Enter C_s = background in-stream pollutant concentration in µg/l (assuming this is zero "0" unless there is data)
Q_r = Q_d+Q_s	Q_r = resultant in-stream flow, after discharge
Calculated on other sheets	C_r = resultant in-stream pollutant concentration in µg/l in the stream (after complete mixing occurs)
50	Enter, Background Hardness above point of discharge (assumed 50 South of Birmingham and 100 North of Birmingham)
7.00 s.u.	Enter, Background pH above point of discharge
YES	Enter, Is discharge to a stream? "YES" Other option would be to a Lake (This changes the partition coefficients for the metals)

** Using Partition Coefficients

October 4, 2016

Facility Name: Georgia Pacific - Naheola

NPDES No.: AL0003301

ID	Pollutant	RP?	Carcinogen yes	Background from upstream source (Cd2) Daily Max	Max Daily Discharge as reported by Applicant (C_{max})	Freshwater Acute (µg/l) Q_s = 1Q10: Water Quality Criteria (C_c)	Draft Permit Limit (C_{max})	20% of Draft Permit Limit	RP?	Background from upstream source (Cd2) Monthly Ave	Avg Daily Discharge as reported by Applicant (C_{avg})	Freshwater Chronic (µg/l) Q_s = 7Q10: Water Quality Criteria (C_c)	Draft Permit Limit (C_{avg})	20% of Draft Permit Limit	RP?	Human Health Consumption Fish only (µg/l) Carcinogen Q_s = Annual Average, Non-Carcinogen Q_s = 7Q10: Water Quality Criteria (C_c)	Draft Permit Limit (C_{avg})	20% of Draft Permit Limit	RP?
1	Antimony			0	0	-	-	-	-	0	0	-	-	-	-	3.73E+02	4.91E+03	9.81E+02	No
2	Arsenic		YES	0	0	592.334	5986.024	1197.205	No	0	0	261.324	3434.083	686.817	No	3.03E-01	9.41E+01	1.88E+01	No
3	Berylium			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
4	Cadmium			0	0	4.347	43.931	8.786	No	0	0	0.844	8.468	1.692	No	-	-	-	
5	Chromium/ Chromium III			0	0	1537.913	15541.887	3108.373	No	0	0	200.051	2628.887	525.777	No	-	-	-	-
6	Chromium/ Chromium VI			0	0	16.000	161.693	32.339	No	0	0	11.000	144.552	28.910	No	-	-	-	-
7	Copper			0	0	18.026	182.171	36.434	No	0	0	12.766	167.753	33.551	No	1.30E+03	1.71E+04	3.42E+03	No
8	Lead			0	0	64.531	652.137	130.427	No	0	0	2.515	33.048	6.609	No	-	-	-	-
9	Mercury			0	0	2.400	24.254	4.851	No	0	0	0.012	0.158	0.032	No	4.24E-02	5.58E-01	1.12E-01	No
10	Nickel			0	0	515.824	5212.827	1042.565	No	0	0	57.292	752.881	150.576	No	9.93E+02	1.30E+04	2.61E+03	No
11	Selenium			0	0	20.000	202.116	40.423	No	0	0	5.000	65.705	13.141	No	2.43E+03	3.19E+04	6.39E+03	No
12	Silver			0	0	0.976	9.868	1.974	No	0	0	-	-	-	-	-	-	-	-
13	Thallium			0	0	-	-	-	-	0	0	-	-	-	-	2.74E-01	3.59E+00	7.19E-01	No
14	Zinc			0	0	197.369	1994.573	398.915	No	0	0	198.963	2614.857	522.971	No	1.49E+04	1.98E+05	3.91E+04	No
15	Cyanide			0	0	22.000	222.328	44.468	No	0	0	5.200	68.334	13.667	No	9.33E+03	1.23E+05	2.45E+04	No
16	Total Phenolic Compounds			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
17	Hardness (As CaCO3)			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
18	Acrolein			0	0	-	-	-	-	0	0	-	-	-	-	5.43E+00	7.13E+01	1.43E+01	No
19	Acrylonitrile		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.44E-01	4.47E+01	8.94E+00	No
20	Aldrin		YES	0	0	3.000	30.317	6.063	No	0	0	1.300	17.083	3.417	No	2.94E-05	9.13E-03	1.83E-03	No
21	Benzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.55E+01	4.80E+03	9.61E+02	No
22	Bromoform		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.68E+01	2.45E+04	4.89E+03	No
23	Carbon Tetrachloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.57E-01	2.97E+02	5.94E+01	No
24	Chlordane		YES	0	0	2.400	24.254	4.851	No	0	0	0.004	0.057	0.011	No	4.73E-04	1.47E-01	2.94E-02	No
25	Clorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	9.06E+02	1.19E+04	2.38E+03	No
26	Chlorodibromo-Methane		YES	0	0	-	-	-	-	0	0	-	-		-	7.41E+00	2.30E+03	4.60E+02	No
27	Chloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	
28	2-Chloro-Ethylvinyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
29	ChloroForm		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.02E+02	3.17E+04	6.33E+03	No
30	4,4' - DDD		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.81E-04	5.63E-02	1.13E-02	No
31	4,4' - DDE		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E-04	3.98E-02	7.96E-03	No
32	4,4' - DDT		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E-04	3.98E-02	7.96E-03	No
33	Dichlorobromo-Methane		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.00E+01	3.12E+03	6.23E+02	No
34	1, 1-Dichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
35	1, 2-Dichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.14E-01	6.64E+03	1.33E+03	No
36	Trans-1, 2-Dichloro-Ethylene			0	0	-	-	-	-	0	0	-	-	-	-	5.91E+03	7.78E+04	1.56E+04	No
37	1, 1-Dichloroethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	4.17E+03	1.29E+06	2.59E+05	No
38	1, 2-Dichloropropane			0	0	-	-	-	-	0	0	-	-	-	-	8.49E+00	1.12E+02	2.23E+01	No
39	1, 3-Dichloro-Propylene			0	0	-	-	-	-	0	0	-	-	-	-	1.23E+01	1.61E+02	3.23E+01	No
40	Dieldrin		YES	0	0	0.240	2.425	0.485	No	0	0	0.056	0.736	0.147	No	3.12E-05	9.70E-03	1.94E-03	No
41	Ethylbenzene			0	0	-	-	-	-	0	0	-	-	-	-	1.24E+03	1.64E+04	3.27E+03	No
42	Methyl Bromide			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+02	1.14E+04	2.29E+03	No
43	Methyl Chloride			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
44	Methylene Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.46E+02	1.07E+05	2.15E+04	No
45	1, 1, 2, 2-Tetrachloro-Ethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.33E+00	7.25E+02	1.45E+02	No
46	Tetrachloro-Ethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.92E+00	5.96E+02	1.19E+02	No
47	Toluene			0	0	-	-	-	-	0	0	-	-	-	-	8.72E+03	1.15E+05	2.29E+04	No
48	Toxaphene		YES	0	0	0.730	7.377	1.475	No	0	0	0.0002	0.003	0.001	No	1.62E 04	5.03E-02	1.01E-02	No
49	Tributyltin (TBT)		YES	0	0	0.460	4.648	0.930	No	0	0	0.072	0.946	0.189	No	-	-	-	-
50	1, 1, 1-Trichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
51	1, 1, 2-Trichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.10E+00	2.82E+03	5.65E+02	No
52	Trichlorethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.75E+01	5.42E+03	1.08E+03	No
53	Vinyl Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.42E+00	4.42E+02	8.85E+01	No
54	P-Chloro-M-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
55	2-Chlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+01	1.14E+03	2.29E+02	No
56	2, 4-Dichlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	1.72E+02	2.26E+03	4.52E+02	No
57	2, 4-Dimethylphenol			0	0	-	-	-	-	0	0	-	-	-	-	4.98E+02	6.54E+03	1.31E+00	No
58	4, 6-Dinitro-O-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
59	2, 4-Dinitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	3.11E+03	4.09E+04	8.18E+03	No
60	4,6-Dinitro-2-methylphenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.65E+02	5.14E+04	1.03E+04	No
61	Dioxin (2,3,7,8-TCDD)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.67E-08	8.28E-06	1.66E-06	No
62	2-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
63	4-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
64	Pentachlorophenol		YES	0	0	8.723	88.156	17.631	No	0	0	6.693	87.948	17.590	No	1.77E+00	5.49E+02	1.10E+02	No
65	Phenol			0	0	-	-	-	-	0	0	-	-	-	-	5.00E+05	6.57E+06	1.31E+06	No
66	2, 4, 6-Trichlorophenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.41E+00	4.39E+02	8.78E+01	No
67	Acenaphthene			0	0	-	-	-	-	0	0	-	-	-	-	5.79E+02	7.60E+03	1.52E+03	No
68	Acenaphthylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
69	Anthracene			0	0	-	-	-	-	0	0	-	-	-	-	2.33E+04	3.07E+05	6.13E+04	No
70	Benzidine			0	0	-	-	-	-	0	0	-	-	-	-	1.16E-04	1.52E-03	3.05E-04	No
71	Benzo(A)Anthracene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.31E+00	6.62E-01	No
72	Benzo(A)Pyrene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.31E+00	6.62E-01	No
73	3, 4 Benzo-Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	1.40E-01	2.80E-02	No
74	Benzo(GHI)Perylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
75	Benzo(K)Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	1.40E-01	2.80E-02	No
76	Bis (2-Chloroethoxy) Methane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
77	Bis (2-Chloroethyl)-Ether		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.07E-01	9.55E+01	1.91E+01	No
78	Bis (2-Chloroiso-Propyl) Ether			0	0	-	-	-	-	0	0	-	-	-	-	3.78E+04	4.97E+05	9.93E+04	No
79	Bis (2-Ethylhexyl) Phthalate		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E+00	3.98E+02	7.96E+01	No
80	4-Bromophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
81	Butyl Benzyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	1.13E+03	1.48E+04	2.96E+03	No
82	2-Chloronaphthalene			0	0	-	-	-	-	0	0	-	-	-	-	9.24E+02	1.21E+04	2.43E+03	No
83	4-Chlorophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
84	Chrysene		YES	0	0		-	-	-	0	0	-	-	-	-	1.07E-02	3.31E+00	6.62E-01	No
85	Di-N-Butyl Phthalate			0	0		-	-	-	0	0	-			-	2.62E+03	3.45E+04	6.89E+03	No
86	Di-N-Octyl Phthalate			0	0		-	-	-	0	0			-	-	-	-	-	-
87	Dibenzo(A,H)Anthracene		YES	0	0	-	-		-	0	0				-	1.07E-02	3.31E+00	6.62E-01	No
88	1, 2-Dichlorobenzene			0	0		-		-	0	0	-			-	7.56E+02	9.93E+03	1.99E+03	No
89	1, 3-Dichlorobenzene			0	0		-	-	-	0	0	-			-	5.62E+02	7.39E+03	1.48E+03	No
90	1, 4-Dichlorobenzene			0	0	-			-	0	0	-			-	1.12E+02	1.48E+03	2.96E+02	No
91	3, 3-Dichlorobenzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.68E-02	5.16E+00	1.03E+00	No
92	Diethyl Phthalate			0	0	-		-	-	0	0				-	2.56E+04	3.36E+05	6.72E+04	No
93	Dimethyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	6.48E+05	8.52E+06	1.70E+06	No
94	2, 4-Dinitrotoluene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.98E+00	6.15E+02	1.23E+02	No
95	2, 6-Dinitrotoluene			0	0		-	-	-	0	0		-	-	-	-	-		-
96	1,2-Diphenylhydrazine			0	0	-	-	-	-	0	0	-		-	-	1.17E-01	1.54E+00	3.08E-01	No
97	Endosulfan (alpha)		YES	0	0	0.22	2.223	0.445	No	0	0	0.056	0.736	0.147	No	5.19E+01	1.61E+04	3.22E+03	No
98	Endosulfan (beta)		YES	0	0	0.22	2.223	0.445	No	0	0	0.056	0.736	0.147	No	5.19E+01	1.61E+04	3.22E+03	No
99	Endosulfan sulfate		YES	0	0	-	-	-	-	0	0	-	-	-	-	5.19E+01	1.61E+04	3.22E+03	No
100	Endrin		YES	0	0	0.086	0.869	0.174	No	0	0	0.036	0.473	0.095	No	3.53E-02	1.10E+01	2.19E+00	No
101	Endrin Aldehyde		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.76E+00	5.48E+02	1.10E+02	No
102	Fluoranthene			0	0	-		-	-	0	0			-	-	8.12E+01	1.07E+03	2.13E+02	No
103	Fluorene			0	0	-	-	-	-	0	0	-	-	-	-	3.11E+03	4.09E+04	8.18E+03	No
104	Heptochlor		YES	0	0	0.52	5.256	1.051	No	0	0	0.004	0.050	0.010	No	4.63E-05	1.44E-02	2.88E-03	No
105	Heptachlor Epoxide		YES	0	0	0.52	5.256	1.051	No	0	0	0.004	0.050	0.010	No	2.29E-05	7.11E-03	1.42E-03	No
106	Hexachlorobenzene		YES	0	0			-	-	0	0	-	-	-	-	1.68E-04	5.21E-02	1.04E-02	No
107	Hexachlorobutadiene		YES	0	0	-	-	-	-	0	0		-	-	-	1.08E+01	3.34E+03	6.68E+02	No
108	Hexachlorocyclohexan (alpha)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.85E-03	8.85E-01	1.77E-01	No
109	Hexachlorocyclohexan (beta)		YES	0	0	-	-	-	-	0	0		-	-	-	9.97E-03	3.10E+00	6.19E-01	No
110	Hexachlorocyclohexan (gamma)		YES	0	0	0.95	9.601	1.920	No	0	0	-	-	-	-	1.08E+00	3.34E+02	6.69E+01	No
111	HexachlorocycloPentadiene			0	0	-	-	-	-	0	0			-	-	8.45E+02	6.48E+03	1.70E+03	No
112	Hexachloroethane			0	0	-		-	-	0	0	-	-	-		1.92E+00	2.52E+01	5.04E+00	No
113	Indeno(1, 2, 3-CK)Pyrene		YES	0	0	-		-	-	0	0		-			1.07E-02	3.31E+00	6.62E-01	No
114	Isophorone			0	0	-	-	-	-	0	0		-	-	-	5.81E+02	7.37E+03	1.47E+03	No
115	Naphthalene			0	0	-		-	-	0	0		-	-	-	-	-	-	
116	Nitrobenzene			0	0	-		-	-	0	0		-		-	4.04E+02	5.30E+03	1.06E+03	No
117	N-Nitrosodi-N-Propylamine		YES	0	0	-		-	-	0	0	-	-			2.95E-01	9.16E+01	1.83E+01	No
118	N-Nitrosodi-N-Methylamine		YES	0	0	-	-			0	0					1.76E+00	5.46E+02	1.09E+02	No
119	N-Nitrosodi-N-Phenylamine		YES	0	0	-		-	-	0	0		-	-	-	3.50E+00	1.09E+03	2.17E+02	No
120	PCB-1016		YES	0	0			-	-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
121	PCB-1221		YES	0	0	-	-	-	-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
122	PCB-1232		YES	0	0				-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
123	PCB-1242		YES	0	0			-	-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
124	PCB-1248		YES	0	0	-	-	-	-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
125	PCB-1254		YES	0	0	-		-	-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
126	PCB-1260		YES	0	0	-			-	0	0	0.014	0.184	0.037	No	3.74E-05	1.16E-02	2.32E-03	No
127	Phenanthrene			0	0		-	-	-	0	0			-		-	-	-	-
128	Pyrene			0	0	-	-	-	-	0	0		-		-	2.33E+03	3.07E+04	6.13E+03	No
129	1, 2, 4-Trichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	4.09E+01	5.38E+02	1.08E+02	No

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT APPLICATION SUPPLEMENTARY INFORMATION

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
WATER DIVISION – INDUSTRIAL / MINING PERMIT SECTION
POST OFFICE BOX 301463
MONTGOMERY, ALABAMA 36130-1463

INSTRUCTIONS: APPLICATIONS SHOULD BE TYPED OR PRINTED IN INK AND SUBMITTED TO THE DEPARTMENT IN DUPLICATE. IF INSUFFICIENT SPACE IS AVAILABLE TO ADDRESS ANY ITEM, PLEASE CONTINUE ON AN ATTACHED SHEET OF PAPER. PLEASE MARK N/A IN THE APPROPRIATE BOX WHEN AN ITEM IS NON-APPLICABLE TO THE APPLICANT.

PURPOSE OF THIS APPLICATION

- ☐ INITIAL PERMIT APPLICATION FOR NEW FACILITY
- ☐ INITIAL PERMIT APPLICATION FOR EXISTING FACILITY
- ☐ MODIFICATION OF EXISTING PERMIT
- ☑ REISSUANCE OF EXISTING PERMIT
- ☐ REVOCATION & REISSUANCE OF EXISTING PERMIT

1. Facility Name: Georgia-Pacific Consumer Products LP

   a. Operator Name: Georgia-Pacific Consumer Products LP

   b. Is the operator identified in 1.a., the owner of the facility? Yes ☑ No ☐
   If no, provide the name and address of the operator and submit information indicating the operator's scope of responsibility for the facility.

2. NPDES Permit Number AL 0 0 0 3 3 0 1

3. SID Permit Number (if applicable): IU ___ ___ - ___ ___ - ___ ___ ___ ___ ___

4. NPDES General Permit Number (if applicable) ALG 0 6 0 1 2 3 ___

5. Facility Physical Location: (Attach a map with location marked; street, route no. or other specific identifier)

   Street: 7530 Highway 114

   City: Pennington County: Choctaw State: Alabama Zip: 36916

   Facility (Front Gate) Latitude: 32 13 30 Longitude: 88 01 40

6. Facility Mailing Address (Street or Post Office Box): 7530 Highway 114

   City: Pennington State: Alabama Zip: 36916

7. Responsible Official (as described on page 13 of this application):

Name and Title: Kelvin J. Hill, Vice President, Naheola Operations

Address: 7530 Highway 114

City: Pennington State: Alabama Zip: 36916

Phone Number: 205 459-1374

EMAIL Address: kelvin.hill@gapac.com

8. Designated Facility Contact:

Name and Title: Laura Connor, EHS Manager

Phone Number: 205 459-1286

EMAIL Address: laura.connor@gapac.com

9. Designated Discharge Monitoring Report Contact:

Name and Title: Shawn Williams, Environmental Engineer

Phone Number: 205 459-1568

EMAIL Address: shawn.williams2@gapac.com

10. Type of Business Entity:

☐ Corporation ☑ General Partnership ☐ Limited Partnership

☐ Sole Proprietorship ☐ Other (Please Specify) _____

11. Complete this section if the Applicant's business entity is a Corporation

a) Location of Incorporation:

Address: _____

City: _____ County: _____ State: _____ Zip: _____

b) Parent Corporation of Applicant:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

c) Subsidiary Corporation(s) of Applicant:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

d) Corporate Officers:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

e) Agent designated by the corporation for purposes of service:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

12. If the Applicant's business entity is a Partnership, please list the general partners.

Name: GPCon/GP LLC

Address: 133 Peachtree Street

City: Atlanta State: Georgia Zip: 30303

Name: GP Muskogee Partner LLC

Address: 133 Peach Tree Street

City: Atlanta State: Georgia Zip: 30303

13. If the Applicant's business entity is a Proprietorship, please enter the proprietor's information.

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

14. Permit numbers for Applicant's previously issued NPDES Permits and identification of any other State of Alabama Environmental Permits presently held by the Applicant, its parent corporation, or subsidiary corporations within the State of Alabama:

Permit Name	Permit Number	Held By
See attachment 2		

15. Identify all Administrative Complaints, Notices of Violation, Directives, Administrative Orders, or Litigation concerning water pollution, if any, against the Applicant, its parent corporation or subsidiary corporations within the State of Alabama within the past five years (attach additional sheets if necessary):

Facility Name	Permit Number	Type of Action	Date of Action
There have been no Administrative	Complaints, Notices of	Violation, Directives, Adminstrative	Orders, or Litigation
concerning water pollution against	the applicant, its indirect	parent Georgia-Pacific LLC, nor	any Georgia-Pacific
subsidiaries within the State of	Alabama within the last	five years.	

SECTION B – BUSINESS ACTIVITY

1. Indicate applicable Standard Industrial Classification (SIC) Codes for all processes (If more than one applies, list in order of importance:

a. 2611

b. 2621

c. 2631

d. _____

e. _____

2. If your facility conducts or will be conducting any of the processes listed below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category of business activity (check all that apply):

Industrial Categories

[ ]	Aluminum Forming	[ ]	Metal Molding and Casting
[ ]	Asbestos Manufacturing	[ ]	Metal Products
[ ]	Battery Manufacturing	[ ]	Nonferrous Metals Forming
[ ]	Can Making	[ ]	Nonferrous Metals Manufacturing
[ ]	Canned and Preserved Fruit and Vegetables	[ ]	Oil and Gas Extraction
[ ]	Canned and Preserved Seafood	[ ]	Organic Chemicals Manufacturing
[ ]	Cement Manufacturing	[ ]	Paint and Ink Formulating
[ ]	Centralized Waste Treatment	[ ]	Paving and Roofing Manufacturing
[ ]	Carbon Black	[ ]	Pesticides Manufacturing
[ ]	Coal Mining	[ ]	Petroleum Refining
[ ]	Coil Coating	[ ]	Phosphate Manufacturing
[ ]	Copper Forming	[ ]	Photographic
[ ]	Electric and Electronic Components Manufacturing	[ ]	Pharmaceutical
[ ]	Electroplating	[ ]	Plastic & Synthetic Materials
[ ]	Explosives Manufacturing	[ ]	Plastics Processing Manufacturing
[ ]	Feedlots	[ ]	Porcelain Enamel
[ ]	Ferroalloy Manufacturing	[✓]	Pulp, Paper, and Fiberboard Manufacturing
[ ]	Fertilizer Manufacturing	[ ]	Rubber
[ ]	Foundries (Metal Molding and Casting)	[ ]	Soap and Detergent Manufacturing
[ ]	Glass Manufacturing	[ ]	Steam and Electric
[ ]	Grain Mills	[ ]	Sugar Processing
[✓]	Gum and Wood Chemicals Manufacturing	[ ]	Textile Mills
[ ]	Inorganic Chemicals	[ ]	Timber Products
[ ]	Iron and Steel	[ ]	Transportation Equipment Cleaning
[ ]	Leather Tanning and Finishing	[ ]	Waste Combustion
[ ]	Metal Finishing	[ ]	Other (specify)_____
[ ]	Meat Products		

A facility with processes inclusive in these business areas may be covered by Environmental Protection (EPA) categorical standards. These facilities are termed "categorical users" and should skip to question 2 of Section C.

3. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

See Attachment 3

SECTION C – WASTEWATER DISCHARGE INFORMATION

Facilities that checked activities in question 2 of Section B and are considered Categorical Industrial Users should skip to question 2 of this section.

1. **For Non-Categorical Users Only**: Provide wastewater flows for each of the processes or proposed processes. Using the process flow schematic (Figure 1, pg 14), enter the description that corresponds to each process. [New facilities should provide estimates for each discharge.]

Process Description	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow	Discharge Type (batch, continuous, intermittent)
N/A			

If batch discharge occurs or will occur, indicate: [New facilities may estimate.]

a. Number of batch discharges: _____ per day

b. Average discharge per batch: _____ (GPD)

c. Time of batch discharges _____ (days of week) at _____ (hours of day)

d. Flow rate: _____ gallons/minute

e. Percent of total discharge: _____

Non-Process Discharges (e.g. non-contact cooling water)	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow

2. **Complete this Section only if you are subject to Categorical Standards and plan to directly discharge the associated wastewater to a water of the State.** If Categorical wastewater is discharged exclusively via an indirect discharge to a public or privately-owned treatment works, check "Yes" in the appropriate space below and proceed directly to part 2.c .

[ ] Yes The Privately owned WWT to which we discharge is our own.

For Categorical Users: Provide the wastewater discharge flows or production (whichever is applicable by the effluent guidelines) for each of your processes or proposed processes. Using the process flow schematic (Figure 1, pg 14), enter the description that corresponds to each process. [New facilities should provide estimates for each discharge.]

2a.

Regulated Process	Applicable Category	Applicable Subpart	Type of Discharge Flow (batch, continuous, intermittent)
2621 Pulp Mill	Pulp,Paper, and Fiber Man	40 CFR 430 Subpart B	Continuous

2b.

Process Description	Last 12 Months (gals/day) Highest Month Average*	Highest Flow Year of Last 5 (gals/day) Monthly Average*	Discharge Type (batch, continuous, intermittent)
See Attachment 3	49.0 MGD	53.5 MGD	Continuous

*** Reported values should be expressed in units of the applicable Federal production-based standard. For example, flow (MGD), production (pounds per day), etc.**

If batch discharge occurs or will occur, indicate: [New facilities may estimate.]

a. Number of batch discharges: N/A per day

b. Average discharge per batch: N/A (GPD)

c. Time of batch discharges N/A (days of week) at N/A (hours of day)

d. Flow rate: N/A gallons/minute

Percent of total discharge: N/A

2c.

Non categorical Process Description	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow	Discharge Type (batch, continuous, intermittent)
All flows are intermingled	and included in 2a		

If batch discharge occurs or will occur, indicate: [New facilities may estimate.]

a. Number of batch discharges: _____ per day

b. Average discharge per batch: _____ (GPD)

c. Time of batch discharges _____ (days of week) at _____ (hours of day)

d. Flow rate: _____ gallons/minute

Percent of total discharge: _____

2d.

Non-Process Discharges (e.g. non-contact cooling water)	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow
All flows are intermingled and	included in 2a	

All Applicants must complete Questions 3 – 5.

3. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Flow Metering	Yes	✓	No	___	N/A ___
Sampling Equipment	Yes	✓	No	___	N/A ___

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

Sampling equipment consist of composite ISCO samplers. Samplers and flow meters are located at the DSN001 outfall as shown in Attachment 1

4. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Yes ☑ No ☐ (If no, skip Question 5)

Briefly describe these changes and their anticipated effects on the wastewater volume and characteristics:

A future woodyard wet deck would combine with the current wood yard process drainage to the onsite WWT. Additional loading from the wet deck to the WWT is expected to be negligible. Future storage of WWT sludge in the DSN001C and DSN002 storage areas is expected to minimal.

5. List the trade name and chemical composition of all biocides and corrosion inhibitors used:

Trade Name	Chemical Composition
See attachment 5	

For each biocide and/or corrosion inhibitor used, please include the following information:

(1) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach,
(2) quantities to be used,
(3) frequencies of use,
(4) proposed discharge concentrations, and
(5) EPA registration number, if applicable

SECTION D – WATER SUPPLY

Water Sources (check as many as are applicable):

[ ] Private Well
[✓] Municipal Water Utility (Specify City): Pennington
[✓] Surface Water
[ ] Other (Specify): See attachment 6

IF MORE THAN ONE WELL OR SURFACE INTAKE, PROVIDE DATA FOR EACH ON AN ATTACHMENT

City: N/A *MGD Well: N/A *MGD Well Depth: N/A Ft. Latitude: N/A Longitude: N/A

Surface Intake Volume: 44.6 *MGD Intake Elevation in Relation to Bottom 0.5 Ft.

Intake Elevation: 16.6 Ft. Latitude: 32 14 08 Longitude: 88 00 58

Name of Surface Water Source: Tombigbee River

*** MGD – Million Gallons per Day**

Cooling Water Intake Structure Information

Complete questions 1 and 2 if your water supply is provided by an outside source and not by an onsite water intake structure? (e.g., another industry, municipality, etc...)

1. Does the provider of your source water operate a surface water intake? Yes [ ] No [✓]
   (If yes, continue, if no, go to Section E.)

   a) Name of Provider _____ b)Location of Provider _____

   c) Latitude: _____ Longitude: _____

2. Is the provider a public water system (defined as a system which provides water to the public for human consumption or which provides only treated water, not raw water)? Yes [ ] No [ ]
   (If yes, go to Section E, if no, continue.)

Only to be completed if you have a cooling water intake structure or the provider of your water supply uses an intake structure and does not treat the raw water.

3. Is any water withdrawn from the source water used for cooling? Yes [✓] No [ ]

4. Using the average monthly measurements over any 12-month period, approximately what percentage of water withdrawn is used exclusively for cooling purposes? 7 %

5. Does the cooling water consist of treated effluent that would otherwise be discharged? Yes [ ] No [✓]
   (If yes, go to Section E, if no, complete questions 6 – 17.)

6. Is the cooling water used in a once-through or closed cycle cooling system? Yes [✓] No [ ]

7. When was the intake installed? 1958
   (Please provide dates for all major construction/installation of intake components including screens)

8. What is the maximum intake volume? 79,200,000 (cooling and process water)
   (maximum pumping capacity in gallons per day)

9. What is the average intake volume? 44,600,000 (cooling and process water)
   (average intake pump rate in gallons per day average in any 30-day period)

10. How is the intake operated? (e.g., continuously, intermittently, batch) Continuously

11. What is the mesh size of the screen on your intake? 3.625 inches by 25.5 inches

12. What is the intake screen flow-through area? 431 square feet

13. What is the through screen design intake flow velocity? 0.16 ft/sec

14. What is the mechanism for cleaning the screen? (e.g., does it rotate for cleaning) manual cleaning of screen

15. Do you have any additional fish detraction technology on your intake? Yes [ ] No [☑]

16. Have there been any studies to determine the impact of the intake on aquatic organisms? Yes [ ] No [☑] (If yes please provide.)

17. Attach a site map showing the location of the water intake in relation to the facility, shoreline, water depth, etc.

SECTION E – WASTE STORAGE AND DISPOSAL INFORMATION

Provide a description of the location of all sites involved in the storage of solids or liquids that could be accidentally discharged to a water of the state, either directly or indirectly via such avenues as storm water drainage, municipal wastewater systems, etc., which are located at the facility for which the NPDES application is being made. Where possible, the location should be noted on a map and included with this application:

Description of Waste	Description of Storage Location
See attachment 3	

Provide a description of the location of the ultimate disposal sites of solid or liquid waste by-products (such as sludges) from any wastewater treatment system located at the facility.

Description of Waste	Quantity (lbs/day)	Disposal Method*
See attachment 7		

***Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site. If any wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.**

SECTION F – COASTAL ZONE INFORMATION

Is the discharge(s) located within 10-foot elevation of Mobile or Baldwin County?

Yes [ ] No [✓] If yes, then complete items A through M below:

	YES	NO
A. Does the project require new construction?	☐	☐
B. Will the project be a source of new air emissions?	☐	☐
C. Does the project involve dredging and/or filling?	☐	☐
Has the Corps of Engineers (COE) permit been received?	☐	☐
Corps Project Number _____		
D. Does the project involve wetlands and/or submersed grassbeds?	☐	☐
E. Are oyster reefs located near the project site? (Include a map showing project and discharge location with respect to oyster reefs)	☐	☐
F. Does the project involve the siting, construction and operation of an energy facility as defined in ADEM Admin. Code R. 335-8-1-.02(bb)?	☐	☐
G. Does the project involve shoreline erosion mitigation?	☐	☐
H. Does the project involve construction on beaches and dunes?	☐	☐
I. Will the project interfere with public access to coastal waters?	☐	☐
J. Does the project lie within the 100-year floodplain?	☐	☐
K. Does the project involve the registration, sale, use, or application of pesticides?	☐	☐
L. Does the project propose to construct a new well or alter an existing well to pump more than 50 GPD?	☐	☐
M. Has the applicable permit been obtained?	☐	☐

SECTION G – ANTI-DEGRADATION EVALUATION

In accordance with 40 CFR 131.12 and the Alabama Department of Environmental Management Administrative Code, Section 335-6-10-.04 for antidegradation, the following information must be provided, if applicable. It is the applicant's responsibility to demonstrate the social and economic importance of the proposed activity. If further information is required to make this demonstration, attach additional sheets to the application.

1. Is this a new or increased discharge that began after April 3, 1991? Yes [ ] No [✓]
   If yes, complete question 2 below. If no, go to Section H.

2. Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced in question 1? Yes [ ] No [ ]

   If yes, do not complete this section.

If no, and the discharge is to a Tier II waterbody as defined in ADEM Admin. Code r. 335-6-10-.12(4), complete questions A through F below and ADEM forms 311 and 313 (attached). Form 313 must be provided for each alternative considered technically viable.

Information required for new or increased discharges to high quality waters:

A. What environmental or public health problem will the discharger be correcting?

B. How much will the discharger be increasing employment (at its existing facility or as the result of locating a new facility)?

C. How much reduction in employment will the discharger be avoiding?

D. How much additional state or local taxes will the discharger be paying?

E. What public service to the community will the discharger be providing?

F. What economic or social benefit will the discharger be providing to the community?

SECTION H – EPA Application Forms

All Applicants must submit EPA permit application forms. More than one application form may be required from a facility depending on the number and types of discharges or outfalls found there. The EPA application forms are found on the Department's website at http://www.adem.state.al.us/. The EPA application forms must be submitted in duplicate as follows:

1. All applicants must submit Form 1.
2. Applicants for existing industrial facilities (including manufacturing facilities, commercial facilities, mining activities, and silvicultural activities) which discharge process wastewater must submit Form 2C.
3. Applicants for new industrial facilities which propose to discharge process wastewater must submit Form 2D.
4. Applicants for new and existing industrial facilities which discharge only non-process wastewater (i.e., non-contact cooling water and/or sanitary wastewater) must submit Form 2E.
5. Applicants for new and existing facilities whose discharge is composed entirely of storm water associated with industrial activity must submit Form 2F, unless exempted by § 122.26(c)(1)(ii). If the discharge is composed of storm water and non-storm water, the applicant must also submit Forms 2C, 2D, and/or 2E, as appropriate (in addition to Form 2F).

SECTION I – ENGINEERING REPORT/BMP PLAN REQUIREMENTS
See ADEM 335-6-6-.08(i) & (j)

SECTION J– RECEIVING WATERS

Receiving Water(s)	303(d) Segment? (Y / N)	Included in TMDL?* (Y / N)
Tombigbee River	N	N

*If a TMDL Compliance Schedule is requested, the following should be attached as supporting documentation:
(1) Justification for the requested Compliance Schedule (e.g. time for design and installation of control equipment, etc.);
(2) Monitoring results for the pollutant(s) of concern which have not previously been submitted to the Department (sample collection dates, analytical results (mass and concentration), methods utilized, MDL/ML, etc. should be submitted as available);
(3) Requested interim limitations, if applicable;
(4) Date of final compliance with the TMDL limitations; and,
(5) Any other additional information available to support requested compliance schedule.

SECTION K – APPLICATION CERTIFICATION

THE INFORMATION CONTAINED IN THIS FORM MUST BE CERTIFIED BY A RESPONSIBLE OFFICIAL AS DEFINED IN ADEM ADMINISTRATIVE RULE 335-6-6-.09 "SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS" (SEE BELOW).

"I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS."

"I FURTHER CERTIFY UNDER PENALTY OF LAW THAT ALL ANALYSES REPORTED AS LESS THAN DETECTABLE IN THIS APPLICATION OR ATTACHMENTS THERETO WERE PERFORMED USING THE EPA APPROVED TEST METHOD HAVING THE LOWEST DETECTION LIMIT FOR THE SUBSTANCE TESTED."

SIGNATURE OF RESPONSIBLE OFFICIAL: Kelvin J Hill DATE SIGNED: 9/16/2010

(TYPE OR PRINT)
NAME OF RESPONSIBLE OFFICIAL: Kelvin J. Hill

TITLE OF RESPONSIBLE OFFICIAL: Vice President, Naheola Operations

MAILING ADDRESS: 7530 Highway 114

CITY, STATE, ZIP: Pennington, Alabama 36916 PHONE: 205 459 1374

RECEIVED
SEP 21 2010
NPDES Permit Bra

335-6-6-.09 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.

(1) The application for an NPDES permit shall be signed by a responsible official, as indicated below:
(a) In the case of a corporation, by a principal executive officer of at least the level of vice president, or a manager assigned or delegated in accordance with corporate procedures, with such delegation submitted in writing if required by the Department, who is responsible for manufacturing, production, or operating facilities and is authorized to make management decisions which govern the operation of the regulated facility;
(b) In the case of a partnership, by a general partner;
(c) In the case of a sole proprietorship, by the proprietor; or
(d) In the case of a municipal, state, federal, or other public entity, by either a principal executive officer, or ranking elected official.

2010 National Pollutant Discharge Elimination System (NPDES) Renewal Application for Georgia-Pacific Consumer Products LP
Permit No. AL0003301

APPLICATION CONTENTS

- EPA Form 1
- EPA Form 2C
- EPA Form 2F
- Permit Application Supplementary Information
  - Attachment 1 – Facility Physical Location Map
  - Attachment 2 – Environmental Permits
  - Attachment 3 – Facility Description
  - Attachment 4 – Production Data
  - Attachment 5 – Biocides and Corrosion Inhibitors
  - Attachment 6 – Water Supply
  - Attachment 7 – Description of waste
  - Attachment 8 – Water and Wastewater flow Diagram
  - Attachment 9 – Chemical Contribution List
  - Attachment 10 – Treatment Unit Capacities
  - Attachment 11 - Cooling Water Supplemental Information
  - Attachment 12 - Chlorophenolics Biocides Certification
  - Attachment 13 - Best Management Practices Implementation Certification
  - Attachment 14 - Stormwater Calculation
  - Attachment 15 - Stormwater Site Map

Georgia-Pacific

Georgia-Pacific
Consumer Products LP

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
Kelvin.Hill@gapac.com

Kelvin J. Hill
V.P., Naheola Operations

September 17, 2010

Mr. Donald Brown
Alabama Department of Environmental Management
Industrial Water Section
1400 Coliseum Boulevard
P. O. Box 301463
Montgomery, Alabama 36130-1463

Subject: NDPES Permit Renewal Application
NPDES Permit No. AL0003301
Georgia-Pacific Consumer Products LP

Dear Mr. Brown:

As required by the current NPDES permit that expires on March 31, 2011, we are submitting the attached renewal application. As part of this renewal package, we are including additional information, or making certain requests as outlined below:

- We are requesting monitoring frequency reductions for Outfall DSN001 for Absorbable Organic Halogens (AOX). Based on our monitoring data over the last term of the permit, we have had no exceedences of the permit limits. The monitoring frequency of the current permit is one sample weekly. Our average over the last two years for AOX is 25 percent of the monthly average limit. We request the frequency be revised to 2 samples per month as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

- We are requesting monitoring frequency reductions for internal Outfalls DSN001A and DSN001B for Chloroform which is monitored once per month. Based on our monitoring data over the last two year period, we have had no exceedances for DSN001A and one exceedance for DSN001B. Our long term average for DSN001A is 28 percent and DSN001B is 37 percent of their monthly average permit limits. We are requesting the frequency be revised to once per quarter as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

- We are requesting monitoring frequency reductions for internal Outfalls DSN001A and DSN001B for Chlorinated Phenolics and TCDD and TCDF Dioxin which is monitored once per quarter. Based on our monitoring data over the last two year period, we have

had no exceedences of the permit limits and tests have been below the analytical detection limits for each test. We are requesting the frequency be revised to 1 every 6 months as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

- We are requesting to discontinuance of the Dioxin Fish Tissue Monitoring and Analysis. Previous monitoring data collected during the last five years were below detectible limits for both the predator and omnivore species.

- We are requesting, dependant upon installation, the use of data (river flow, dissolved oxygen, and temperature) from a USGS Monitoring Station that may be located at the Highway 114 Bridge crossing the Tombigbee River. This potential monitoring station is located approximately at river mile 173.4. If in the event the station is not installed or issues with the station prevent the collection of river data, the river flow and temperature will be obtained from the Demopolis Lock and Dam, and the dissolved oxygen will be measured at the mill's water intake structure.

We will be submitting, in a separate submittal, all the river water quality data collected for use in a water quality model for the Tombigbee River. A low flow event occurred in July and data was collected at that time. We are still awaiting the results of the long term BOD tests that were setup at the time.

We appreciate the opportunity to submit these requests and are available to discuss these requests further. Should you have any questions with the permit applications, or on any of the contents of the permit renewal package, please contact Shawn Williams at (205) 459-1568.

Sincerely,

Kelvin J. Hill
V.P., Naheola Operations

Attachment: Historical test data

Historical Test Data

Outfall Number: DSN001
Parameter: AOX (Absorbable Organic Halogens)

Month	2008	2009
Jan	920	654
Feb	671	711
March	527	381
April	518	705
May	513	518
June	395	402
July	484	348
Aug	454	473
Sep	464	431
Oct	503	523
Nov	615	576
Dec	788	615

2 year average	549.5
Permit limit	2185.0
Percent of permit	25.2

Outfall Number: DSN001A and DSN001B
Parameter: Chloroform

	2008					
	HW (DSN001A)			SW (DSN001B)		
Month	Avg	Permit Limit	% of Permit	Avg	Permit Limit	% of Permit
Jan	2.02	9.56	21.1	1.3	4.95	26.3
Feb	1.38	10.02	13.8	0.77	4.95	15.6
March	1.61	9.56	16.8	1.21	4.95	24.4
April	2.61	10.02	26.0	2.95	4.95	59.6
May	2.48	10.02	24.8	3.04	4.95	61.4
June	3.41	9.56	35.7	3.15	4.95	63.6
July	6.88	10.02	68.7	2.64	4.95	53.3
Aug	1.18	10.02	11.8	1.3	4.95	26.3
Sep	2.15	10.02	21.5	0.89	4.95	18.0
Oct	2.15	9.56	22.5	1.92	4.95	38.8
Nov	2.64	10.02	26.3	1.85	4.95	37.4
Dec	2.11	9.56	22.1	1.8	4.95	36.4

	2009					
	HW (DSN001A)			SW (DSN001B)		
Month	Avg	Permit Limit	% of Permit	Avg	Permit Limit	% of Permit
Jan	1.82	9.56	19.0	1.98	4.95	40.0
Feb	3.01	10.02	30.0	1.33	4.95	26.9
March	2.48	9.56	25.9	2.72	4.95	54.9
April	4.97	10.02	49.6	2.65	4.95	53.5
May	3.03	9.56	31.7	1.93	4.95	39.0
June	2.85	9.56	29.8	1.81	4.95	36.6
July	2.09	10.02	20.9	1.34	4.95	27.1
Aug	2.96	9.56	31.0	1.26	4.95	25.5
Sep	2.64	9.56	27.6	0.74	4.95	14.9
Oct	4.5	9.56	47.1	2.21	4.95	44.6
Nov	2.76	9.56	28.9	1.65	4.95	33.3
Dec	2.25	9.56	23.5	1.33	4.95	26.9

HW Chloroform 2 year average	2.7
Percent of permit	28.2
SW Chloroform 2 year average	1.8
Percent of permit	36.8

Outfall Number: DSN001A and DSN001B
Parameter: Chlorinated Phenolics

Date	HW (DSN001A)	% of Permit	SW (DSN001B)	% of Permit
1st Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
2nd Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
3rd Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
4th Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
1st Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
2nd Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
3rd Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
4th Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0

Outfall Number: DSN001A and DSN001B
Parameter: Dioxin

Date	HW (DSN001A)	% of Permit	SW (DSN001B)	% of Permit
1st Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
2nd Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
3rd Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
4th Quarter 2008	Less than Detection Limit	0	Less than Detection Limit	0
1st Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
2nd Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
3rd Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0
4th Quarter 2009	Less than Detection Limit	0	Less than Detection Limit	0

Outfall Number: DSN001
Parameter: Dioxin (Fish Tissue Testing)

Date	Omnivore Species	% of Permit	Predator Species	% of Permit
December-04	Less than Detection Limit	0	Less than Detection Limit	0
November-09	Less than Detection Limit	0	Less than Detection Limit	0

Please print or type in the unshaded areas only.

Form Approved. OMB No. 2040-0086.

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S		T/A	C
F	ALD039135231		D

1 | 2 — 13 | 14 | 15

LABEL ITEMS	
I.	EPA I.D. NUMBER
III.	FACILITY NAME
V.	FACILITY MAILING ADDRESS
VI.	FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	Mark "X" YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
	16	17	18
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to waters of the U.S.? (FORM 2B)		X	
	19	20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		X
	22	23	24
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to waters of the U.S.? (FORM 2D)		X	
	25	26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)		X	
	28	29	30
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
	34	35	36
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	37	38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
	40	41	42
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
	43	44	45

III. NAME OF FACILITY

1 | SKIP | Georgia-Pacific Consumer Products LP

15 | 16 – 29 | 30 — 69

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 Kelvin J. Hill - V.P. Naheola Operations	205 459 1374
15 — 16 — 45	48 — 49 — 51 — 52 — 55

V. FACILTY MAILING ADDRESS

A. STREET OR P.O. BOX

3 7530 Highway 114

15 — 16 — 45

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 Pennington	Al	36916
15 — 16 — 40	41 — 42	47 — 51

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 7530 Highway 114

15 — 16 — 45

B. COUNTY NAME

Choctaw

46 — 70

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 Pennington	AL	36916	
15 — 16 — 40	41 — 42	47 — 51	52 — 54

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
2621 *(specify)* Paper Mills	2611 *(specify)* Pulp Mills
C. THIRD	**D. FOURTH**
2631 *(specify)* PaperBoard Mills	*(specify)*

VIII. OPERATOR INFORMATION

A. NAME	B. Is the name listed in Item VIII-A also the owner?
Georgia-Pacific Consumer Products LP	☑ YES ☐ NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other," specify.)*		D. PHONE *(area code & no.)*
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC *(other than federal or state)* O = OTHER *(specify)*	P *(specify)*	A 205 459 1900

E. STREET OR P.O. BOX	
7530 Highway 114	

F. CITY OR TOWN	G. STATE	H. ZIP CODE	IX. INDIAN LAND
Pennington	AL	36916	Is the facility located on Indian lands? ☐ YES ☑ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	D. PSD *(Air Emissions from Proposed Sources)*
N AL0003301	P See Attachment 2
B. UIC *(Underground Injection of Fluids)*	**E. OTHER** *(specify)*
U N/A	See Attachment *(specify)*
C. RCRA *(Hazardous Wastes)*	**E. OTHER** *(specify)*
R N/A	See Attachment *(specify)*

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements. Attachment 1 - Map

XII. NATURE OF BUSINESS *(provide a brief description)*

Georgia-Pacific Consumer Products LP is an integrated Bleached Kraft Pulp Mill. The mill purchases wood in form of logs and wood chips. Wood chips are processed to create pulp which is bleached. Bleached pulp is processed by 5 tissue machines, 2 board machines and one pulp dryer. Towel, tissue, napkins, coated and uncoated board, and market pulp are produced. Parent rolls of paper are converted onsite or shipped to other mills. Converting operations process parent rolls produced at the mill and from other mills to produce finished consumer products. The products are packaged and stored in the Distribution warehouse until shipped.

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
Kelvin J. Hill Vice President, Naheola Operations		

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*): ALD039135231

Form Approved.
OMB No. 2040-0086.
Approval expires 3-31-98.

FORM **2C** NPDES

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (*list*)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (*name*)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
DSN001	32.00	12.00	54.00	88.00	0.00	33.00	Tombigbee River
Internal							
Outfalls:							
DSN001A	32.00	13.00	37.00	88.00	1.00	28.00	To WWT of DSN001
DSN001B	32.00	13.00	39.00	88.00	1.00	28.00	To WWT of DSN001

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (*e.g., for certain mining activities*), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (*list*)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT		
	a. OPERATION (*list*)	b. AVERAGE FLOW (*include units*)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
DSN001	Corbined Pulpmill Sewer (CPS)	14.6 MGD	Screening	1	T
	Corbined Papermill Sewer (CPM)	13.4 MGD	Sedimentation	1	U
	Foul Condensate (Hardpipe)	4.0 MGD	Mixing	1	O
	Woodyard	0.07 MGD	Aerated Lagoons	3	B
	Ash Sluice	1.1 MGD	Stablization Ponds	3	G
	Landfill Lechate	0.002 MGD	Discharge to Surface Water	4	A
	Stormwater	2.1 MGD	Sludge Lagoons	5	T
	Filter Plant Backwash	1.1 MGD	Gravity Thickening	5	L
	Other Activities as described in		Incineration	5	O
	Attachment 3		Land Application	5	P
			Landfill	5	Q
	Treated Sanitary waste	0.05 MGD	Treated Sanitary Waste	1	L
				3	A
	Total For Outfall DSN001	49.0 MGD		2	F
DSN001 A	Hardwood Bleach Plant Filtrate	6.3 MGD	To WWT of DSN001		
	Internal outfall				
	(regulated by 430.24)				
DSN001 B	Softwood Bleach Plant Filtrate	6.3 MGD	To WWT of DSN001		
	Internal outfall				
	(regulated by 430.24)		(Note: See attachment 10 for "Treatment Unit Capacities")		

OFFICIAL USE ONLY (*effluent guidelines sub-categories*)

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES (*complete the following table*) ☑ NO (*go to Section III*)

1. OUTFALL NUMBER (*list*)	2. OPERATION(s) CONTRIBUTING FLOW (*list*)	3. FREQUENCY a. DAYS PER WEEK (*specify average*)	3. FREQUENCY b. MONTHS PER YEAR (*specify average*)	4. FLOW a. FLOW RATE (*in mgd*) 1. LONG TERM AVERAGE	4. FLOW a. FLOW RATE (*in mgd*) 2. MAXIMUM DAILY	4. FLOW B. TOTAL VOLUME (*specify with units*) 1. LONG TERM AVERAGE	4. FLOW B. TOTAL VOLUME (*specify with units*) 2. MAXIMUM DAILY	C. DURATION (*in days*)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☑ YES (*complete Item III-B*) ☐ NO (*go to Section IV*)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (*or other measure of operation*)?

☑ YES (*complete Item III-C*) ☐ NO (*go to Section IV*)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (*specify*)	2. AFFECTED OUTFALLS (*list outfall numbers*)
1,877,247	lbs/day	Board 40 CFR 430.22 (2009 average)	DSN001
1,368,428	lbs/day	Tissue 40 CFR 430.22 (2009 average)	DSN001
392,884	lbs/day	Market Pulp 40 CFR 430.22 (2009 average)	DSN001
1225	ADMT/day	unbleached hardwood pulp (2009 average)	DSN001A
579	ADMT/day	unbleached softwood pulp (2009 average) (regulated by 40 CFR 430.24) (Note: See Attachment 4 for production calculations)	DSN001B
		Turpentine Production (40 CFR 454.20) Production amounts are insignificant for turpentine. Please ignore for limitation calculations.	

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operations of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (*complete the following table*) ☑ NO (*go to Item IV-B*)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS a. NO.	2. AFFECTED OUTFALLS b. SOURCE OF DISCHARGE	3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE a. REQUIRED	4. FINAL COMPLIANCE DATE b. PROJECTED
N/A	N/A	N/A	N/A	N/A	N/A

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (*or other environmental projects which may affect your discharges*) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction.

☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)
ALD039135231

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding – Complete one set of tables for each outfall – Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
DSN001 Acetaldehyde Formaldehyde Malathion Methyl mercaptan Propylene oxide Pyrethins Vanadium Carbon Disulfide Hydrogen Sulfide	 Converting adhesives Pulping process Insecticides Pulping process Converting adhesives Insecticides Pulping process Pulping process Pulping process	The above chemicals are used in support operations or are present in trace amounts in raw materials or chemicals and thus, may be present in the wastewater prior to treatment system. All of these substances with the exception of vanadium are either subject to adequate treatment through either oxidation (from aer ation) or biodegradation (in the mill's biological treatment system). Vanadium as a trace contaminant in pulping wastewater may be also absorbed onto both primary and secondary solids and removed through sedimentation in the wastewater treatment system processes.	

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ YES (*list all such pollutants below*) ☑ NO (*go to Item VI-B*)

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☑ YES (*Identify the test(s) and describe their purposes below*) ☐ NO (*go to Section VIII*)

Short-term Chronic Toxicity screening tests are perfomred yearly for Outfall DSN001

The tests were performed in accordance with the current edition of the "EPA Short-Term Methods for Estimating the Chronic Toxcity of Effluents and Receiving Water to Freshwater Organisms." The Larval Survival and Growth Test Method 1000.0 was used for the Fathead Minnow Test and the Survival and Reproduction Test Method 1002.0 was used for the Ceriodaphnia Test.

These tests were performed in order to comply with the NPDES Permit AL0003301 conditions.

Over the 5 year permit limit, there have been no violations of WET requirements. There was an initial test failure for Fathead Minnow in early 2008 - however, the retest as required by the permit passed.

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☑ YES (*List the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below*) ☐ NO (*go to Section IX*)

A. NAME	B. ADDRESS	C. TELEPHONE (*area code & no.*)	D. POLLUTANTS ANALYZED (*list*)
Test America	900 Lakshore Drive Mobile, Alabama	(251) 666-6633	Volatile Organic Semivolatile Organic Pesticides/PCB Mercury Metals Radiological General Chemistry
Analytical Perspectives	2714 Exchange Drive Wilmington, NC 28405	(910) 794-1613	Dioxin

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE (*type or print*)	B. PHONE NO. (*area code & no.*)
Kelvin J. Hill	(205) 459-1374
C. SIGNATURE	D. DATE SIGNED

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (*use the same format*) instead of completing these pages.
SEE INSTRUCTIONS.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*): ALD039135231

V. INTAKE AND EFFLUENT CHARACTERISTICS (*continued from page 3 of Form 2-C*)

OUTFALL NO.: DSN001

PART A –You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT						d. NO. OF ANALYSES	3. UNITS (*specify if blank*)		4. INTAKE (*optional*)		
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)			a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (*BOD*)	33	16431	33	16431	13	5373	363	mg/L	lbs	N/A	N/A	N/A
b. Chemical Oxygen Demand (*COD*)	272	116693	272	116693	200	81414	363	mg/L	lbs	N/A	N/A	N/A
c. Total Organic Carbon (*TOC*)	50	29232	N/A	N/A	N/A	N/A	1	mg/L	lbs	N/A	N/A	N/A
d. Total Suspended Solids (*TSS*)	75	17451	75	17451	9.0	3630	363	mg/L	lbs	N/A	N/A	N/A
e. Ammonia (*as N*)	0.63	368	N/A	N/A	N/A	N/A	1	mg/L	lbs	N/A	N/A	N/A
f. Flow	VALUE 70.1		VALUE 70.1		VALUE 49.0		363	MGD	MGD	VALUE N/A		N/A
g. Temperature (*winter*)	VALUE 30.5		VALUE 30.5		VALUE 16.9		179	°C		VALUE N/A		N/A
h. Temperature (*summer*)	VALUE 33.0		VALUE 33.0		VALUE 27.7		184	°C		VALUE N/A		N/A
i. pH	MINIMUM 7.3	MAXIMUM 8.0	MINIMUM 7.3	MAXIMUM 8.0			363	STANDARD UNITS				

PART B – Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)	X		< 0.20	N/A	N/A	N/A	N/A	N/A	1	mg/L	lbs	N/A	N/A	N/A
b. Chlorine, Total Residual		X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
c. Color	X		450	263085	N/A	N/A	N/A	N/A	1	PCU	lbs	N/A	N/A	N/A
d. Fecal Coliform	X		48	N/A	N/A	N/A	N/A	N/A	1	CFU	lbs	N/A	N/A	N/A
e. Fluoride (16984-48-8)		X	< 0.18	N/A	N/A	N/A	N/A	N/A	1	MG/L	lbs	N/A	N/A	N/A
f. Nitrate-Nitrite (*as N*)	X		1.2	702	N/A	N/A	N/A	N/A	1	mg/L	lbs	N/A	N/A	N/A

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (*as N*)	X		5.0	2923	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
h. Oil and Grease	X		3.9	2280	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
i. Phosphorus (as P), Total (7723-14-0)	X		1.4	818	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
j. Radioactivity														
(1) Alpha, Total	X		4.8	N/A	N/A	N/A	N/A	N/A	1	pCi/L	N/A	N/A	N/A	N/A
(2) Beta, Total	X		21	N/A	N/A	N/A	N/A	N/A	1	pCi/L	N/A	N/A	N/A	N/A
(3) Radium, Total	X		0.9	N/A	N/A	N/A	N/A	N/A	1	pCi/L	N/A	N/A	N/A	N/A
(4) Radium 226, Total	X		0.3	N/A	N/A	N/A	N/A	N/A	1	pCi/L	N/A	N/A	N/A	N/A
k. Sulfate (*as SO_4*) (14808-79-8)	X		2100	1227731	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
l. Sulfide (*as S*)	X		< 0.18	N/A	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
m. Sulfite (*as SO_3*) (14265-45-3)	X		1.1	643	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
n. Surfactants	X		0.13	76	N/A	N/A	N/A	N/A	1	mg/L	LBS	N/A	N/A	N/A
o. Aluminum, Total (7429-90-5)	X		1300	760	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.78	0.34	1
p. Barium, Total (7440-39-3)	X		160	94	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.052	0.02	1
q. Boron, Total (7440-42-8)	X		61	36	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.015	0.007	1
r. Cobalt, Total (7440-48-4)	X		0.8	0.5	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0020	N/A	1
s. Iron, Total (7439-89-6)	X		520	304	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.76	0.34	1
t. Magnesium, Total (7439-95-4)	X		10000	5846	N/A	N/A	N/A	N/A	1	ug/L	LBS	5.4	2.4	1
u. Molybdenum, Total (7439-98-7)	X		14	8.2	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.0042	0.002	1
v. Manganese, Total (7439-96-5)	X		610	357	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.048	0.02	1
w. Tin, Total (7440-31-5)	X		0.7	0.4	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.010	N/A	1
x. Titanium, Total (7440-32-6)	X		9.2	5.4	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.027	0.012	1

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
ALD039135231	DSN001

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (*all 7 pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)	X			1.6	0.94	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.020	N/A	1
2M. Arsenic, Total (7440-38-2)	X			11	6.4	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0059	N/A	1
3M. Beryllium, Total (7440-41-7)	X			0.073	0.04	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.00050	N/A	1
4M. Cadmium, Total (7440-43-9)	X			0.33	0.19	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.00051	N/A	1
5M. Chromium, Total (7440-47-3)	X			< 2.5	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.0026	0.0012	1
6M. Copper, Total (7440-50-8)	X			2.2	1.3	N/A	N/A	N/A	N/A	1	ug/L	LBS	0.0023	0.001	1
7M. Lead, Total (7439-92-1)	X			0.96	0.56	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0050	N/A	1
8M. Mercury, Total (7439-97-6)	X			0.7	0.0004	N/A	N/A	N/A	N/A	1	ng/L	LBS	<0.000071	N/A	1
9M. Nickel, Total (7440-02-0)	X			2.4	1.4	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0080	N/A	1
10M. Selenium, Total (7782-49-2)	X			1.0	0.58	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.010	N/A	1
11M. Silver, Total (7440-22-4)	X			< 0.050	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0043	N/A	1
12M. Thallium, Total (7440-28-0)	X			< 0.40	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.010	N/A	1
13M. Zinc, Total (7440-66-6)	X			43	25.1	N/A	N/A	N/A	N/A	1	ug/L	LBS	<0.0080	N/A	1
14M. Cyanide, Total (57-12-5)	X			0.0070	4.0	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
15M. Phenols, Total	X			0.0060	3.5	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
DIOXIN															
2,3,7,8-Tetra-chlorodibenzo-P-Dioxin (1764-01-6)	X			DESCRIBE RESULTS < 10 PPQ											

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Acrolein (107-02-8)	X			< 0.28	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
2V. Acrylonitrile (107-13-1)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
3V. Benzene (71-43-2)	X			< 0.49	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
4V. Bis (*Chloromethyl*) Ether (542-88-1)	X			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5V. Bromoform (75-25-2)	X			< 0.90	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
6V. Carbon Tetrachloride (56-23-5)	X			< 0.76	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
7V. Chlorobenzene (108-90-7)	X			< 0.93	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
8V. Chlorodibromomethane (124-48-1)	X			< 0.75	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
9V. Chloroethane (75-00-3)	X			< 0.53	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
10V. 2-Chloroethylvinyl Ether (110-75-8)	X			< 3.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
11V. Chloroform (67-66-3)	X			< 0.42	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
12V. Dichlorobromomethane (75-27-4)	X			< 0.67	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
13V. Dichlorodifluoromethane (75-71-8)	X			< 0.54	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
14V. 1,1-Dichloroethane (75-34-3)	X			< 0.50	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
15V. 1,2-Dichloroethane (107-06-2)	X			< 0.63	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
16V. 1,1-Dichloroethylene (75-35-4)	X			< 0.57	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
17V. 1,2-Dichloropropane (78-87-5)	X			< 0.49	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
18V. 1,3-Dichloropropylene (542-75-6)	X			< 0.65	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
19V. Ethylbenzene (100-41-4)	X			< 0.67	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
20V. Methyl Bromide (74-83-9)	X			< 0.50	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
21V. Methyl Chloride (74-87-3)	X			2.5	1.5	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (*continued*)															
22V. Methylene Chloride (75-09-2)	X			< 0.38	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
23V. 1,1,2,2-Tetrachloroethane (79-34-5)	X			< 0.99	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
24V. Tetrachloro-ethylene (127-18-4)	X			< 0.57	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
25V. Toluene (108-88-3)	X			0.71	0.41	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
26V. 1,2-Trans-Dichloroethylene (156-60-5)	X			< 0.44	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
27V. 1,1,1-Trichloro-ethane (71-55-6)	X			< 0.65	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
28V. 1,1,2-Trichloro-ethane (79-00-5)	X			1.0	0.58	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
29V Trichloro-ethylene (79-01-6)	X			< 0.49	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
30V. Trichloro-fluoromethane (75-69-4)	X			< 0.48	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
31V. Vinyl Chloride (75-01-4)	X			< 0.54	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)	X			< 3.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
2A. 2,4-Dichloro-phenol (120-83-2)	X			< 0.36	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
3A. 2,4-Dimethyl-phenol (105-67-9)	X			< 0.41	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
4A. 4,6-Dinitro-O-Cresol (534-52-1)	X			< 4.0	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
5A. 2,4-Dinitro-phenol (51-28-5)	X			< 0.41	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
6A. 2-Nitrophenol (88-75-5)	X			< 3.1	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
7A. 4-Nitrophenol (100-02-7)	X			< 2.7	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
8A. P-Chloro-M-Cresol (59-50-7)	X			< 4.7	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
9A. Pentachloro-phenol (87-86-5)	X			< 3.5	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
10A. Phenol (108-95-2)	X			< 0.49	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
11A. 2,4,6-Trichloro-phenol (88-05-2)	X			< 3.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	X			< 4.5	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
2B. Acenaphtylene (208-96-8)	X			< 6.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
3B. Anthracene (120-12-7)	X			< 4.2	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
4B. Benzidine (92-87-5)	X			< 17	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
5B. Benzo (*a*) Anthracene (56-55-3)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
6B. Benzo (*a*) Pyrene (50-32-8)	X			< 6.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
7B. 3,4-Benzo-fluoranthene (205-99-2)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
8B. Benzo (*ghi*) Perylene (191-24-2)	X			< 4.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
9B. Benzo (*k*) Fluoranthene (207-08-9)	X			< 5.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
10B. Bis (*2-Chloro-ethoxy*) Methane (111-91-1)	X			< 9.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
11B. Bis (*2-Chloro-ethyl*) Ether (111-44-4)	X			< 3.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
12B. Bis (*2-Chloroisopropyl*) Ether (102-80-1)	X			< 3.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
13B. Bis (*2-Ethyl-hexyl*) Phthalate (117-81-7)	X			< 11	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
14B. 4-Bromophenyl Phenyl Ether (101-55-3)	X			< 4.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
15B. Butyl Benzyl Phthalate (85-68-7)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
16B. 2-Chloro-naphthalene (91-58-7)	X			< 3.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)	X			< 4.0	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
18B. Chrysene (218-01-9)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
19B. Dibenzo (*a,h*) Anthracene (53-70-3)	X			< 4.5	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
20B. 1,2-Dichloro-benzene (95-50-1)	X			< 4.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
21B. 1,3-Di-chloro-benzene (541-73-1)	X			< 4.1	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A

CONTINUED FROM PAGE V-6

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
22B. 1,4-Dichlorobenzene (106-46-7)	X			< 4.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
23B. 3,3-Dichlorobenzidine (91-94-1)	X			< 9.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
24B. Diethyl Phthalate (84-66-2)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
25B. Dimethyl Phthalate (131-11-3)	X			< 4.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
26B. Di-N-Butyl Phthalate (84-74-2)	X			< 9.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
27B. 2,4-Dinitrotoluene (121-14-2)	X			< 3.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
28B. 2,6-Dinitrotoluene (606-20-2)	X			< 4.1	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
29B. Di-N-Octyl Phthalate (117-84-0)	X			< 6.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
30B. 1,2-Diphenylhydrazine (as Azobenzene) (122-66-7)	X			< 9.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
31B. Fluoranthene (206-44-0)	X			< 4.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
32B. Fluorene (86-73-7)	X			< 4.2	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
33B. Hexachlorobenzene (118-74-1)	X			< 3.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
34B. Hexachlorobutadiene (87-68-3)	X			< 4.5	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
35B. Hexachlorocyclopentadiene (77-47-4)	X			< 2.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
36B Hexachloroethane (67-72-1)	X			< 4.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
37B. Indeno (1,2,3-cd) Pyrene (193-39-5)	X			< 5.4	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
38B. Isophorone (78-59-1)	X			< 4.7	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
39B. Naphthalene (91-20-3)	X			< 3.7	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
40B. Nitrobenzene (98-95-3)	X			< 3.2	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
41B. N-Nitrosodimethylamine (62-75-9)	X			< 4.3	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
42B. N-Nitrosodi-N-Propylamine (621-64-7)	X			< 4.1	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
43B. N-Nitrosodiphenylamine (86-30-6)	X			< 12	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
44B. Phenanthrene (85-01-8)	X			< 4.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
45B. Pyrene (129-00-0)	X			< 7.8	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
46B. 1,2,4-Trichlorobenzene (120-82-1)	X			< 3.9	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
GC/MS FRACTION – PESTICIDES															
1P. Aldrin (309-00-2)	X			< 0.0044	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
2P. α-BHC (319-84-6)	X			< 0.0054	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
3P. β-BHC (319-85-7)	X			< 0.0035	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
4P. γ-BHC (58-89-9)	X			< 0.0048	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
5P. δ-BHC (319-86-8)	X			< 0.010	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
6P. Chlordane (57-74-9)	X			< 0.031	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
7P. 4,4'-DDT (50-29-3)	X			< 0.0044	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
8P. 4,4'-DDE (72-55-9)	X			< 0.0062	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
9P. 4,4'-DDD (72-54-8)	X			< 0.0074	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
10P. Dieldrin (60-57-1)	X			< 0.0072	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
11P. α-Enosulfan (115-29-7)	X			< 0.0043	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
12P. β-Endosulfan (115-29-7)	X			< 0.0046	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
13P. Endosulfan Sulfate (1031-07-8)	X			< 0.0087	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
14P. Endrin (72-20-8)	X			< 0.0065	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
15P. Endrin Aldehyde (7421-93-4)	X			< 0.0067	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A
16P. Heptachlor (76-44-8)	X			< 0.0036	N/A	N/A	N/A	N/A	N/A	1	ug/L	LBS	N/A	N/A	N/A

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
ALD039135231	DSN001

CONTINUED FROM PAGE V-8

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – PESTICIDES (*continued*)															
17P. Heptachlor Epoxide (1024-57-3)	X			< 0.0038	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
18P. PCB-1242 (53469-21-9)	X			< 0.17	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
19P. PCB-1254 (11097-69-1)	X			< 0.12	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
20P. PCB-1221 (11104-28-2)	X			< 0.17	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
21P. PCB-1232 (11141-16-5)	X			< 0.13	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
22P. PCB-1248 (12672-29-6)	X			< 0.14	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
23P. PCB-1260 (11096-82-5)	X			< 0.12	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
24P. PCB-1016 (12674-11-2)	X			< 0.11	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A
25P. Toxaphene (8001-35-2)	X			< 0.30	N/A	N/A	N/A	N/A	N/A	1	ug/L	ug/L	N/A	N/A	N/A

Please print or type in the unshaded areas only.

EPA ID Number (*copy from Item 1 of Form 1*)
ALD039135231

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

FORM 2F NPDES

U.S. Environmental Protection Agency
Washington, DC 20460

Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity

Paperwork Reduction Act Notice

Public reporting burden for this application is estimated to average 28.6 hours per application, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate, any other aspect of this collection of information, or suggestions for improving this form, including suggestions which may increase or reduce this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, DC 20460, or Director, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

I. Outfall Location

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. Outfall Number (*list*)	B. Latitude			C. Longitude			D. Receiving Water (*name*)
DSN001C	32	12.00	54.00	88	0.00	52.00	Tombigbee River
DSN002	32	13.00	55.00	88	0.00	59.00	Tombigbee River
DSN003	32	14.00	27.00	88	1.00	11.00	Tombigbee River
Note:							
DSN001 is an							
internal outfall							
that discharges							
to the WWT System							
for DSN001							

II. Improvements

A. Are you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

1. Identification of Conditions, Agreements, Etc.	2. Affected Outfalls		3. Brief Description of Project	4. Final Compliance Date	
	number	source of discharge		a. req.	b. proj.
NA	NA	NA	NA	NA	NA

B. You may attach additional sheets describing any additional water pollution (or other environmental projects which may affect your discharges) you now have under way or which you plan. Indicate whether each program is now under way or planned, and indicate your actual or planned schedules for construction.

III. Site Drainage Map

Attach a site map showing topography (or indicating the outline of drainage areas served by the outfalls(s) covered in the application if a topographic map is unavailable) depicting the facility including: each of its intake and discharge structures; the drainage area of each storm water outfall; paved areas and buildings within the drainage area of each storm water outfall, each known past or present areas used for outdoor storage of disposal of significant materials, each existing structural control measure to reduce pollutants in storm water runoff, materials loading and access areas, areas where pesticides, herbicides, soil conditioners and fertilizers are applied; each of its hazardous waste treatment, storage or disposal units (including each area not required to have a RCRA permit which is used for accumulating hazardous waste under 40 CFR 262.34); each well where fluids from the facility are injected underground; springs, and other surface water bodies which received storm water discharges from the facility. See Attachment 15

Continued from the Front

IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of imperious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
DSN001C	NONE	1 acre			
DSN002	NONE	23 acres			
DSN003	NONE	45 acres			

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed to minimize contact by these materials with storm water runoff; materials loading and access areas, and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.

DSN001-C-Drainage from this site includes stormwater from future de-watered sludge/ash storage area and access road runoff. The stormwater is discharged to the polishing pond of the wastewater treatment system.
DSN002-Stormwater drainage from area along HWY 114, portions of a closed lime mud pond and drainage from plant access road. This area will also recieve stormwater from a future de-watered sludge/ash storage site.
DSN003- Drainage area includes portions of the closed lime mud pond,Alabama power substation, contractor equipement storage area, small wooded area, approximatley 5 acres of graveled parking lot and the plant access road from gate 6.

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
001-C	Grassy earthen Berm, non-structual controls include site inspections as required by the mill's Storm Water Pollution Prevention Plan	
002	Grassed areas, non-structual controls include site inspections as required by the mill's Storm Water Pollution Prevention Plan	
003	Sediment Pond, non-structual controls include site inspections as required by the mill's Storm Water Pollution Prevention Plan. Solids from the sediment pond as diposed in the mill's landfill	1-U

V. Nonstormwater Discharges

A. I certify under penalty of law hat the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharged from these outfall(s) are identified in either an accompanying Form 2C or From 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
Kelvin J. Hill-VP-Naheola		

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

Inspections for all stormwater discharge points are completed at a minimum of every two weeks. Non-storm water discharges are documented on these inspections. Yearly non-storm water certifications are submitted with December NPDES DMR reports.

VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

No significant spills have ocurred in storm water drainage areas DSN001C, DSN002, and DSN003. Spills in DSN001C stormwater drainage area are collected and treated in the mill's effluent treatment plant prior to discharging to the Tombigbee River

Continued from Page 2

EPA ID Number *(copy from Item 1 of Form 1)*
ALD039135231

VII. Discharge Information

A, B, C, & D: See instructions before proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space provided. Table VII-A, VII-B, VII-C are included on separate sheets numbers VII-1 and VII-2.

E. Potential discharges not covered by analysis – Is any toxic pollutant listed in table 2F-2, 2F-3, or 2F-4, a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ Yes *(list all such pollutants below)* ☑ No *(go to Section IX)*

VIII. Biological Toxicity Testing Data

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ Yes *(list all such pollutants below)* ☑ No *(go to Section IX)*

IX. Contract Analysis Information

Were any of the analyses reported in Item VII performed by a contract laboratory or consulting firm?

☑ Yes *(list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)* ☐ No *(go to Section X)*

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed
Test America	900 Lakeside Drive Mobile, AL 36693	(251)666-6633	See Attachment C

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name & Official Title *(Type Or Print)*	B. Area Code and Phone No.
Kelvin J. Hill- Vice President- Naheola Operations	(205)459-1374
C. Signature	D. Date Signed

DSN001

EPA ID Number (*copy from Item 1 of Form 1*)
ALD039135231

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

VII. Discharge Information *(Continued from page 3 of Form 2F)*

Part A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease		N/A	N/A		SEE D7	Plant Operations
Biological Oxygen Demand (BOD5)	N/A	N/A	N/A		SEE D7	Plant Operations
Chemical Oxygen Demand (COD)	N/A	N/A	N/A		SEE D7	Plant Operations
Total Suspended Solids (TSS)	N/A	N/A	N/A		SEE D7	Plant Operations
Total Nitrogen	N/A	N/A	N/A	5.0 mg/l	SEE D7	Plant Operations
Total Phosphorus	N/A	N/A	N/A	1.4 mg/l	SEE D7	Plant Operations
pH	Minimum	Maximum	Minimum	Maximum		

Part B – List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
pH		SEE ABOVE				
BOD5		SEE ABOVE				
TSS		SEE ABOVE				
AOX	NA	NA	NA			
Chlorophenolics	NA		NA			
Chloroform (HW)	NA		NA			
Chloroform (SW)	NA		NA			
2,3,7,8 TCDD						
2,3,7,8 TCDF						

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event *(in minutes)*	3. Total rainfall during storm event *(in inches)*	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event *(gallons/minute or specify units)*	6. Total flow from rain event *(gallons or specify units)*
NA	NA	NA	NA	NA	NA

7. Provide a description of the method of flow measurement or estimate.

DSN001 is a continuous process discharge with a calibrated flowmeter.

DSN001C

EPA ID Number *(copy from Item 1 of Form 1)*

Form Approved. OMB No. 2040-0088
Approval expires 5-31-92

VII. Discharge Information *(Continued from page 3 of Form 2F)*

Part A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	<3.5 mg/l	N/A	<3.5 mg/l	N/A	3.00	Access road runoff
Biological Oxygen Demand (BOD5)	2.8 mg/l	N/A	2.8 mg/l	N/A	1.00	Access road runoff
Chemical Oxygen Demand (COD)	194 mg/l	N/A	160 mg/l	N/A	4.00	Access road runoff
Total Suspended Solids (TSS)	6840 mg/l	N/A	3630 mg/l	N/A	3.00	Access road runoff
Total Nitrogen	2.9 mg/l	N/A	2.9 mg/l	N/A	1.00	Access road runoff
Total Phosphorus	0.89 mg/l	N/A	0.89 mg/l	N/A	1.00	Access road runoff
pH	Minimum 7.2	Maximum 7.80	Minimum 7.2	Maximum 7.80	4.00	Access road runoff

Part B – List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Copper	0.027 mg/l	N/A	0.0151 mg/l	N/A	3.00	Access road runoff
Cadimum	0.0013 mg/l	N/A	0.0011 mg/l	N/A	3.00	Access road runoff
Chrominum	0.068 mg/l	N/A	0.037 mg/l	N/A	3.00	Access road runoff
O&G	<3.5	N/A	<3.5	N/A	3.00	Access road runoff
TDS	270 mg/l	N/A	159 mg/l	N/A	2.00	Access road runoff
COD	194 mg/l	N/A	160 mg/l	N/A	4.00	Access road runoff

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event *(in minutes)*	3. Total rainfall during storm event *(in inches)*	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event *(gallons/minute or specify units)*	6. Total flow from rain event *(gallons or specify units)*
N/A	N/A	N/A	N/A	N/A	N/A

7. Provide a description of the method of flow measurement or estimate.

Flow is estimated

DSN002

EPA ID Number *(copy from Item 1 of Form 1)*

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

VII. Discharge Information *(Continued from page 3 of Form 2F)*

Part A -- You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	< 3.5 mg/l	N/A	< 3.5 mg/l	N/A	4.00	Access road runoff
Biological Oxygen Demand (BOD5)	7 mg/l	N/A	4 mg/l	N/A	4.00	Access road runoff
Chemical Oxygen Demand (COD)	97 mg/l	N/A	71 mg/l	N/A	4.00	Access road runoff
Total Suspended Solids (TSS)	151 mg/l	N/A	85 mg/l	N/A	4.00	Access road runoff
Total Nitrogen	1.7 mg/l	N/A	1.7 mg/l	N/A	1.00	Access road runoff
Total Phosphorus	0.22 mg/l	N/A	0.22 mg/l	N/A	1.00	Access road runoff
pH	Minimum 7.60	Maximum 9.30	Minimum 7.6	Maximum 9.3	4.00	Access road runoff

Part B -- List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Copper	0.027 mg/l	N/A	0.0151 mg/l	N/A	3.00	Access road runoff
Cadimum	0.0013 mg/l	N/A	0.0011 mg/l	N/A	3.00	Access road runoff
Chrominum	0.068 mg/l	N/A	0.037 mg/l	N/A	3.00	Access road runoff
O&G	<3.5	N/A	<3.5	N/A	3.00	Access road runoff
TDS	270 mg/l	N/A	159 mg/l	N/A	2.00	Access road runoff
COD	194 mg/l	N/A	160 mg/l	N/A	4.00	Access road runoff

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
N/A	N/A	N/A	N/A	N/A		N/A

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event *(in minutes)*	3. Total rainfall during storm event *(in inches)*	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event *(gallons/minute or specify units)*	6. Total flow from rain event *(gallons or specify units)*
N/A	N/A	N/A	N/A	N/A	N/A

7. Provide a description of the method of flow measurement or estimate.

Flow is estimated

DSN003

EPA ID Number (*copy from Item 1 of Form 1*)

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

VII. Discharge Information *(Continued from page 3 of Form 2F)*

Part A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	< 3.5 mg/l	N/A	< 3.5 mg/l	N/A	2.00	Access road runoff
Biological Oxygen Demand (BOD5)	6 mg/l	13 mg/l	5 mg/l	13 mg/l	2.00	Access road runoff
Chemical Oxygen Demand (COD)	N/A	71 mg/l	N/A	71 mg/l	1.00	Access road runoff
Total Suspended Solids (TSS)	610 mg/l	N/A	334 mg/l	N/A	3.00	Access road runoff
Total Nitrogen	3.3 mg/l	N/A	3.3 mg/l	N/A	1.00	Access road runoff
Total Phosphorus	0.78 mg/l	N/A	0.78 mg/l	N/A	1.00	Access road runoff
pH	Minimum 7.10	Maximum 9.90	Minimum 7.10	Maximum 9.90	3.00	Access road runoff

Part B – List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
BOD	6 mg/l	13 mg/l	5 mg/l	13 mg/l	2.00	Access road runoff
Oil & Grease	<3.5 mg/l	N/A	<3.5 mg/l	N/A	2.00	Access road runoff
TSS	610 mg/l	N/A	334 mg/l	N/A	3.00	Access road runoff
pH	9.9	N/A	8.22	N/A	3.00	Access road runoff

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

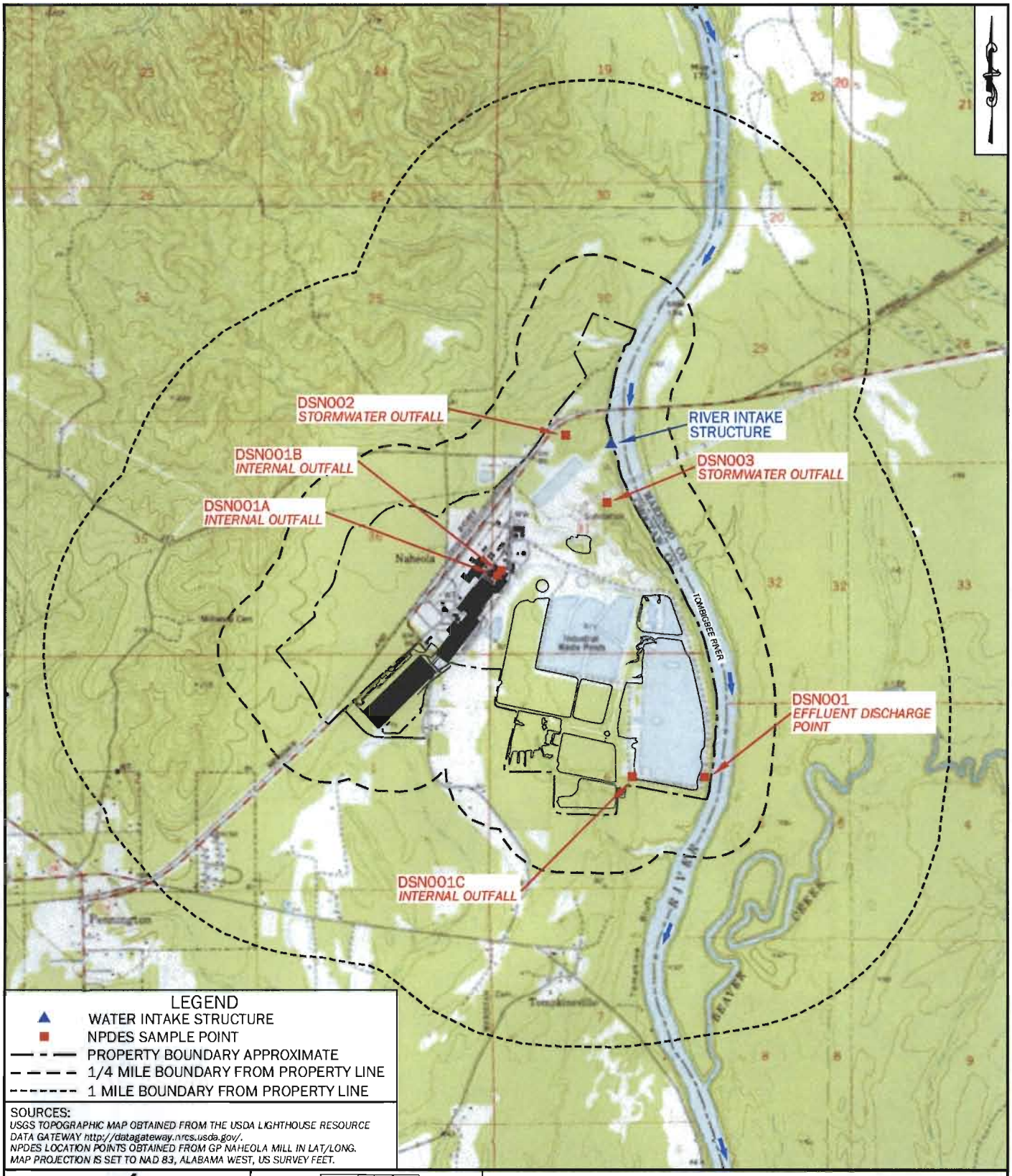
Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event *(in minutes)*	3. Total rainfall during storm event *(in inches)*	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event *(gallons/minute or specify units)*	6. Total flow from rain event *(gallons or specify units)*
4/8/2010	210	1.31	72 hours	100 gpm	0.02 MG

7. Provide a description of the method of flow measurement or estimate.

Flow is estimated at the outfall point



LEGEND

- WATER INTAKE STRUCTURE
- NPDES SAMPLE POINT
- PROPERTY BOUNDARY APPROXIMATE
- 1/4 MILE BOUNDARY FROM PROPERTY LINE
- 1 MILE BOUNDARY FROM PROPERTY LINE

SOURCES:
USGS TOPOGRAPHIC MAP OBTAINED FROM THE USDA LIGHTHOUSE RESOURCE DATA GATEWAY http://datagateway.nrcs.usda.gov/.
NPDES LOCATION POINTS OBTAINED FROM GP NAHEOLA MILL IN LAT/LONG.
MAP PROJECTION IS SET TO NAD 83, ALABAMA WEST, US SURVEY FEET.

synTerra
148 RIVER STREET, SUITE 220
GREENVILLE, SOUTH CAROLINA
PHONE 864-421-9999
www.synterracorp.com

USGS TOPOGRAPHIC MAP
NPDES SAMPLE LOCATION MAP
GEORGIA-PACIFIC NAHEOLA MILL
PENNINGTON, ALABAMA
PENNINGTON, AL QUADRANGLE

DRAWN BY: JOHN CHASTAIN
PROJECT MANAGER: D. ROSSETER
LAYOUT: NPDES TOPO
DATE: 07/20/2010
CONTOUR INTERVAL: 10 FEET
MAP DATE: 1978

GRAPHIC SCALE
1500 0 1500 3000
IN FEET

P:\GP Naheola.366\20.NPDES PERMIT\03.NPDES MAP\DWG\36620 NPDES MAP.dwg

ATTACHMENT 2

PERMIT NAME	PERMIT NUMBER	PERMIT HELD BY
Title V Air Permit	101-0001	Georgia-Pacific
Solid Waste Disposal Facility Permit	12-02	Georgia-Pacific
Scrap Tire Receiver Registration	S0000004848	Georgia-Pacific
Agriculture Liming Material Permit	235497	Georgia-Pacific
NPDES Individual Permit	AL0003301	Georgia-Pacific
NPDES General Permit	ALG060123	Georgia-Pacific
Certificate of Use (Water Withdrawal)	OWR-0166	Georgia-Pacific
Submerged Pipeline Right-of-Way	91-12-002	Rock Tenn/GP
Alabama Radioactive Material Lic.	299	Georgia-Pacific
Migratory Bird Depredation Permit	MB 047134-0	Georgia-Pacific

ATTACHMENT 3

The Naheola Mill is an integrated pulp and paper mill with hardwood and softwood pulping lines. Currently, the mill produces approximately 1,800 tons per day (tpd) of unbleached pulp. Of this, approximately 65 percent is hardwood pulp and 35 percent is softwood pulp.

The pulp and paper manufacturing begins at the wood yard where the mill receives hardwood and softwood in form of whole tree logs as well as wood chips. The logs are chipped after cutting, debarking and screening operations are complete. Once processed, these wood yard generated chips are stored along with the chips delivered in rail cars, trucks, and barges. The hardwood and softwood chips are stored in separate piles.

Hardwood chips are conveyed to the digester area and are cooked in eight batch digesters of identical size. Cooking chemicals and steam are added to each digester for pulping of the wood chips. After sufficient cooking has taken place, the content of each digester is blown into the hardwood blow tank. Steam is recovered in a blow heat recovery system. The hardwood pulp is washed on a horizontal belt, brown stock washer (Chemi-washer) and is bleached in a three stage bleach plant.

The softwood chips are cooked in a continuous Kamyr digester. The softwood pulp is washed on two compaction baffle brown stock washers and is bleached in a four stage bleach plant. Following the bleaching stage, both the hardwood and softwood pulp are stored in high density towers, ready for use either in the paper mill to make tissue, towel, board products, and baled dried pulp.

Pulping chemicals are regenerated in a chemical recovery system consisting of an eight effect evaporator system and high solids crystallizer, a non-direct contact evaporator recovery furnace and a lime kiln. Black liquor produced in the pulping process is concentrated in the evaporators (to increase solids content). Next it is sprayed into the No. 4 Recovery furnace, where the organic fraction is combusted and the inorganic fraction is reduced and melted (producing a molten material called smelt). The smelt is subsequently is drawn off and dissolved in weak wash water to form green liquor in the No. 4 smelt dissolving tank. The clarified green liquor is processed in the causticizing area to produce white liquor, which is used as cooking chemical in the pulp mill. The calcium carbonate precipitates (lime mud) are separated from the white liquor stream and introduced into the No. 3 Lime Kiln where quick lime (calcium oxide) is regenerated. The steam generated in the No.4 Recovery Furnace is sent to a common header for distribution among the process units in the mill.

The paper making operations at the Naheola Mill consist of five tissue machines (#1 TM, #4 TM, #5 TM, #6 TM, and #7 TM), two board machines (#2 BM and #3 BM) and a pulp dryer. Stock preparation is the first step in the paper making process in which pulp is modified into an acceptable form to be delivered to the paper machines. It involves pulp blending, refining, chemical addition and metering of virgin stock, purchased pulp and reprocessed broke pulp. Different combinations of pulp, chemicals and additives are used to produce various grades of paper products. The majority of pulp consumed in the paper mill is generated on-site; however, the mill also has flexibility to receive and use purchased pulp. The # 2 BM produces light and

medium grades of paper while the #3 BM produces medium to heavy weight food grade paper products. The # 1, 4, 5 Tissue machines produce towel and tissue, as the #6 and #7 TM produce mainly tissue. The pulp dryer uses steam to dry pulp and compress it into bales. The bales are shipped to other mills or are utilized at the mill.

The converting units at the Naheola Mill are used to convert parent rolls of paper, either produced in the mill or procured from outside sources, into a quality product in a marketable form. The machines used to achieve this consist of roll towel re-winders, roll tissue re-winders, napkin and towel folders, core machines, wrapping equipment and case packer-sealers. Additionally, there is a broke repulper system that processes broke that can be pumped back into the pulp process to the paper machines. The converting equipment lines operate more or less in an identical manner. The machine rewinds a parent roll of paper, which subsequently undergoes embossing, printing (optional), slitting perforating, winding or stacking. The product is then wrapped and/or inserted into cases. The cases are then boxed or stretch wrapped before shipping. Board products are not processed in the mill converting units.

The steam plant at the Naheola Mill consists of two multi-fuel combination boilers (#1 CB and #2 CB) which primarily combust coal and bark/wood residuals, a power boiler (#3 PB) capable of firing natural gas and No. 6 fuel oil, and two natural gas fired package boilers (# 5 PB and # 6 PB), and the Chemical Recovery unit (CRU) #4 Recovery boiler as discussed earlier. The steam generated in these boilers is sent to a common header for distribution in the mill.

Wastewater produced at the mill along with the majority of stormwater for the mill site are collected in various sewers and drainage ditches that flow to the effluent treatment system. In addition to the normal process and non-process wastewaters collected, the mill may discharge wastewaters resulting from essential maintenance, regularly scheduled maintenance, startup and shutdown of equipment, and from incidental spills from anywhere in the permitted facility. However, these wastewaters are amenable to treatment as provided in the treatment system and will not impact effluent limitations.

Wastewater collected from the process areas, stormwater, and landfill leachate flows through a bar screen which removed large solids materials. Screenings are collected and disposed of in the mill's landfill. Wastewater then flows to primary effluent clarifiers or can be diverted to a emergency spill pond. If in the event that one of the primary clarifiers is not operational, flow would be diverted to one clarifier. After solids have settled in the primary clarifier, sludge underflow pumps at each clarifier, pump solids to either the Sludge Press or to two sludge ponds. Sludge is dewatered in the sludge press by gravity tables and screw presses and filtrate is returned back to the head of the system. Decant from the sludge pond enters the emergency spill pond, where wastewater is pumped back to the bar screen for treatment in the effluent system. Clarified wastewater flows to the effluent lift pumps. Before the wastewater is pumped to the Aeration Stabilization Basin, nutrients (nitrogen and phosphorus) are added to support biological growth in the treatment system.

The Aerated Stabilization Basin consists of three aeration ponds and a settling pond. The basin contains high speed floating aerators with a combined horsepower of 4,040 to supply aeration to facilitate biological treatment. During low BOD loadings, selected aerators may be shutdown for energy savings. For effluent cooling, pH and effluent loading buffering, an aeration recycle line is utilized. The aeration line collects effluent from the exit of ASB Pond 1 and returns the wastewater to the effluent lift pumps. After treatment in ASB Pond 1, wastewater enters ASB Pond 2. Foul condensate is introduced subsurface into the inlet of ASB Pond 2. Wastewater enters ASB Pond 3 before gravity flowing to the final settling pond. Wood and coal ash from the combination boilers is sluiced into two adjacent ash settling ponds. Decant from these ash ponds enter into final settling pond. The settling pond can be used to store effluent during restricted discharge allocations. The mill also has two oxygenation plants that can be utilized during summer months (May thru October) for oxygen addition to the Tombigbee River. Effluent flow is measured using magnetic flow meters prior to discharge. A refrigerated composite sampler is situated at outfall 001 to collect samples as required. Treated effluent is discharged through one or two of the diffusers into the river.

Board Mill Production

	2005			2006			2007			2008			2009		
	Total Tons	Tons/Day	lbs/Day	Total Tons	Tons/Day	lbs/Day	Total Tons	Tons/Day	lbs/Day	Total Tons	Tons/Day	lbs/Day	Total Tons	Tons/Day	lbs/Day
Jan	31814.71	908.99	1,817,983	28959.41	843.65	1,687,294	29124.92	966.40	1,932,808	28238.29	910.91	1,821,825	22242.61	783.37	1,566,745
Feb	24505.98	888.88	1,777,759	24732.3	896.32	1,792,639	22763.32	878.15	1,756,292	27005.53	931.23	1,862,450	23929.03	854.61	1,709,216
Mar	25383.61	906.56	1,813,115	24875.02	888.39	1,776,787	30401.02	980.68	1,961,356	17878.58	947.58	1,895,162	13691.9	793.89	1,587,782
Apr	28440.52	862.74	1,725,472	25994.14	896.35	1,792,699	29378.68	979.29	1,958,579	26574.36	885.81	1,771,624	25425.05	847.50	1,695,003
May	25782.48	920.80	1,841,606	29095.71	938.57	1,877,143	29467.96	950.58	1,901,159	27522.24	887.81	1,775,628	26312.63	850.40	1,700,810
Jun	25998.16	928.51	1,857,011	27354.75	911.83	1,823,650	27405.17	913.51	1,827,011	26173.55	872.45	1,744,903	24049.53	881.98	1,763,968
Jul	31687.41	905.35	1,810,709	26191	844.87	1,689,742	29051.64	937.15	1,874,299	29560.34	953.56	1,907,119	27282.32	880.07	1,760,150
Aug	26737.63	954.92	1,909,831	29086.9	938.29	1,876,574	28483.97	918.84	1,837,675	28189.53	909.34	1,818,679	25933.77	836.57	1,673,146
Sep	25152.31	898.30	1,796,594	27928.82	930.96	1,861,921	27628.63	920.95	1,841,909	28295.96	943.20	1,886,397	26221.8	874.06	1,748,120
Oct	31179.83	890.85	1,781,705	28888.8	931.90	1,863,794	27387.21	883.46	1,766,917	25895.11	937.59	1,875,170	25347.77	817.67	1,635,340
Nov	19102.26	828.16	1,656,311	29641.83	988.06	1,976,122	27028.46	900.95	1,801,897	25964.49	865.48	1,730,966	27030.61	901.02	1,802,041
Dec	14839.41	743.26	1,486,527	26924.2	868.52	1,737,045	29376.97	947.64	1,895,288	27257.22	879.27	1,758,530	25088.47	809.31	1,618,611

Highlighted is the 12 Month Production Period (Aug 2006 - July 2007) 1,877,246.66 lbs/Day
Last 12 Month Period Average (April 2009 - March 2010) 1,711,494.07 lbs/Day
Highest Month in the Last Year (April 2009) 1754678.32 lbs/Day

Market Pulp

	2005				2006				2007				2008				2009			
	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day
Jan	6643	32.11	206.88	413,765	7349	35	209.97	419,943	1944.86	31	62.74	125,475	4825.93	31	155.68	311,350	5212.13	31	168.13	336,266
Feb	6083.9	26.9	226.17	452,335	5576.6	28	199.16	398,329	2585.95	28	92.36	184,711	5530.91	29	190.72	381,442	4605.88	28	164.50	328,991
Mar	5459.3	27.5	198.52	397,040	5044	28	180.14	360,286	3659.08	31	118.03	236,070	3250.52	31	104.86	209,711	3412.39	31	110.08	220,154
Apr	4424.2	23.93	184.88	369,762	4992.46	29	172.15	344,308	3305.23	30	110.17	220,349	5631.09	30	187.70	375,406	5256	30	175.20	350,400
May	3952.6	20.25	195.19	390,380	5072	31	163.61	327,226	3241.12	31	104.55	209,105	5347.8	31	172.51	345,019	4024.23	31	129.81	259,628
Jun	6132.4	25.67	238.89	477,787	3739	30	124.63	249,267	2508.76	30	83.63	167,251	4845.3	30	161.51	323,020	4414.59	30	147.15	294,306
Jul	4718	21.5	219.44	438,884	3407.9	31	109.93	219,865	4024.15	31	129.81	259,623	4243.98	31	136.90	273,805	4738.69	31	152.86	305,722
Aug	4000.8	16.3	245.45	490,896	2975.8	31	95.99	191,987	4384.69	31	141.44	282,883	4791.06	31	154.55	309,101	4372.05	31	141.03	282,068
Sep	4077.3	20.08	203.05	406,106	4462.09	30	148.74	297,473	5582.7	30	186.09	372,180	5536.38	30	184.55	369,092	4122.07	30	137.40	274,805
Oct	7280.1	32.83	221.75	443,503	3701.5	31	119.40	238,806	5045	31	162.74	325,484	6113.58	31	197.21	394,425	3434.87	31	110.80	221,605
Nov	2182	20.33	107.33	214,658	3319.9	30	110.66	221,327	4311	30	143.70	287,400	5363.16	30	178.77	357,544	150.36	30	5.01	10,024
Dec	2179	20.43	106.66	213,314	3361.14	31	108.42	216,848	5601.29	31	180.69	361,374	3760.71	31	121.31	242,626	3968.5	31	128.02	256,032

Highlighted is the 12 Month Production Period (Aug 2006 - July 2007) 392,883.88 lbs/Day lbs/Day
Last 12 Month Period Average (April 2009 - March 2010) 243,318.06 lbs/Day
Highest Month in the Last Year (April 2009) 350,400 Lbs/Day

Tissue Production

	2005				2006				2007				2008				2009			
	lbs	Operating Days	Tons/Day	lbs/Day	lbs	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day	Ton	Operating Days	Tons/Day	lbs/Day
Jan	46,616,671	31	756.03	1,512,055	44,800,141	34	655.55	1,311,096	27,917,019	20	702.70	1,405,390	32,896,880	25	666.68	1,333,360	34,757,490	30	575.46	1,150,910
Feb	36,512,852	28	652.02	1,304,030	37,549,157	27	690.24	1,380,484	28,152,274	20	701.28	1,402,559	31,825,175	23	688.75	1,377,500	33,570,060	28	599.47	1,198,931
Mar	37,663,417	31	607.47	1,214,949	39,658,934	28	713.29	1,426,580	40,747,637	30	685.70	1,371,401	20,569,720	14	731.74	1,463,473	26,591,600	22	610.42	1,220,839
Apr	45,198,078	29	784.69	1,569,378	38,032,650	28	684.04	1,368,081	40,502,343	29	695.52	1,391,036	30,067,135	22	688.91	1,377,820	37,612,055	30	626.87	1,253,735
May	39,219,013	31	632.56	1,265,129	42,230,809	30	693.02	1,386,037	42,468,398	31	692.84	1,385,679	32,022,000	25	645.60	1,291,210	36,810,070	31	593.71	1,187,422
Jun	31,902,019	27	597.42	1,194,832	39,948,749	30	670.98	1,341,951	41,133,657	30	687.15	1,374,310	31,860,908	24	663.77	1,327,538	31,931,860	29	554.37	1,108,745
Jul	45,436,675	30	745.60	1,491,194	41,007,206	31	663.22	1,326,436	42,818,710	31	694.39	1,388,771	32,405,010	25	653.33	1,306,654	36,977,363	30	616.88	1,233,751
Aug	35,194,033	29	601.20	1,202,393	40,352,298	30	668.37	1,336,733	36,194,098	28	654.83	1,309,668	33,796,555	25	681.38	1,362,764	36,623,207	31	595.82	1,191,644
Sep	36,802,103	29	629.53	1,259,052	40,492,489	30	674.87	1,349,750	32,418,910	24	683.02	1,366,042	32,542,326	24	690.88	1,381,757	33,901,796	29	580.26	1,160,524
Oct	45,943,960	31	750.72	1,501,437	40,687,714	30	677.41	1,354,816	30,442,980	25	618.12	1,236,234	30,859,997	24	652.98	1,305,967	36,071,425	31	581.80	1,163,594
Nov	31,908,011	29	542.65	1,085,306	40,394,476	30	675.45	1,350,892	31,699,967	24	661.76	1,323,530	32,329,792	28	573.90	1,147,803	36,529,440	29	629.75	1,259,498
Dec	35,427,398	28	632.86	1,265,716	38,791,300	29	665.71	1,331,422	33,400,120	25	673.39	1,346,779	34,928,220	29	603.42	1,206,849	24,873,900	22	570.68	1,141,367

Highlighted is highest 12 Month Production Period (Nov 2006 - Oct 1,368,428 lbs/Day
Last 12 Month Period Average (June 2009 - May 2010) 1,189,640 lbs/Day
Highest Month in the Last Year (July 2009) 1,119,818 Lbs/Day

DSN001 Unbleached Pulp Production

	2005					2006					2007					2008					2009				
	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day
Jan	53952.4	48945.62	31	1740.4	1578.9	50066.3	45420.1	29	1726.4	1566.2	24287.3	22033.4	15	1619.2	1468.9	49630.2	45024.5	31	1601.0	1452.4	44212.9	40109.9	31	1426.2	1293.9
Feb	47214.2	42832.72	28	1686.2	1529.7	49789	45168.6	28	1778.2	1613.2	34444.2	31247.8	28	1230.2	1116.0	51177.5	46428.2	29	1764.7	1601.0	43635.3	39585.9	28	1558.4	1413.8
Mar	53677.4	48696.14	31	1731.5	1570.8	53436.1	48477.2	31	1723.7	1563.8	55629.5	50467.1	31	1794.5	1628.0	28434.3	25795.6	20	1421.7	1289.8	23295.3	21133.5	19	1226.1	1112.3
Apr	46198.7	41911.46	30	1540.0	1397.0	52753.5	47858.0	30	1758.5	1595.3	51338.9	46574.7	30	1711.3	1552.5	49244.3	44674.4	30	1641.5	1489.1	46933.4	42578.0	30	1564.4	1419.3
May	51956.1	47134.57	30	1731.9	1571.2	55538.5	50384.5	31	1791.6	1625.3	56093.1	50887.7	31	1809.5	1641.5	49446.8	44858.1	31	1595.1	1447.0	46258.9	41966.1	31	1492.2	1353.7
Jun	50638.1	45938.88	30	1687.9	1531.3	48708.2	44188.1	30	1623.6	1472.9	50213.3	45553.5	29	1731.5	1570.8	47575.8	43160.8	30	1585.9	1438.7	42432.5	38494.8	29	1463.2	1327.4
Jul	51577.3	46790.93	29	1778.5	1613.5	50807.6	46092.7	31	1639.0	1486.9	57826.3	52460.0	31	1865.4	1692.3	51955	47133.6	31	1676.0	1520.4	48944.8	44402.7	31	1578.9	1432.3
Aug	51576.6	46790.29	31	1663.8	1509.4	48936.5	44395.2	31	1578.6	1432.1	50370.7	45696.3	30	1679.0	1523.2	53472.9	48510.6	31	1724.9	1564.9	43776.3	39713.9	30	1459.2	1323.8
Sep	51458.6	46683.24	30	1715.3	1556.1	51916.2	47098.4	30	1730.5	1569.9	52500.1	47628.1	30	1750.0	1587.6	52688.9	47799.4	30	1756.3	1593.3	47203.4	42822.9	30	1573.4	1427.4
Oct	53447.8	48487.84	31	1724.1	1564.1	55463.4	50316.4	31	1789.1	1623.1	50742.5	46033.6	31	1636.9	1485.0	48064.3	43603.9	31	1550.5	1406.6	45883	41625.1	31	1480.1	1342.7
Nov	44856.9	40694.18	28	1602.0	1453.4	53641.3	48663.4	30	1788.0	1622.1	49041.3	44490.3	30	1634.7	1483.0	47491.1	43083.9	30	1583.0	1436.1	45925.8	41663.9	30	1530.9	1388.8
Dec	32658.6	29627.88	25	1306.3	1185.1	50516.2	45828.3	31	1629.6	1478.3	56304.6	51079.5	31	1816.3	1647.7	47476.5	43070.7	31	1531.5	1389.4	40825.1	37036.5	31	1316.9	1194.7
Total Tons	589212.7					621572.8					588791.8					576657.6					519326.7				
Total Days	354					363					347					355					351				
Tons/Davg	1664.4					1712.3					1696.8					1624.4					1479.6				
Total Tonne	534533.76					563890.84					534151.92					523143.77					471133.18				
Tonne/Davg	1510.0					1553.4					1539.3					1473.6					1342.3				

Highlighted are Production (Dec 2005 - Nov 2006) 572323.4 Tonne
Operating Days 364
Annual Production divided by operating days 1572.3 Tonne/Day

DSN001A Unbleached Hardwood Pulp Production

	2005					2006					2007					2008					2009				
	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day
Jan	37106.3	33662.84	31	1197.0	1085.9	32301.2	29303.6	29	1113.8	1010.5	15650.1	14197.8	15	1043.3	946.5	31350.2	28440.9	30	1045.0	948.0	31429.6	28512.9	31	1013.9	919.8
Feb	31533.7	28607.37	28	1126.2	1021.7	32534.3	29515.1	28	1161.9	1054.1	25577.3	23203.7	28	913.5	828.7	34336.3	31149.9	29	1184.0	1074.1	30490.2	27660.7	28	1088.9	987.9
Mar	35604.7	32300.58	31	1148.5	1042.0	33648.2	30525.6	31	1085.4	984.7	38607.3	35024.5	31	1245.4	1129.8	19921.3	18072.6	20	996.1	903.6	15713.2	14255.0	19	827.0	750.3
Apr	29564.9	26821.28	30	985.5	894.0	33354.7	30259.4	30	1111.8	1008.6	33018.6	29954.5	29	1138.6	1032.9	33902.9	30756.7	30	1130.1	1025.2	33143.9	30068.1	30	1104.8	1002.3
May	33902.9	30756.71	30	1130.1	1025.2	36638.5	33238.4	31	1181.9	1072.2	38457.8	34888.9	31	1240.6	1125.4	35104.2	31846.5	31	1132.4	1027.3	33240.3	30155.6	31	1072.3	972.8
Jun	34253.3	31074.59	30	1141.8	1035.8	31484.1	28562.4	30	1049.5	952.1	33335.6	30242.1	29	1149.5	1042.8	32901.8	29848.5	29	1134.5	1029.3	29805.4	27039.5	29	1027.8	932.4
Jul	36405.6	33027.16	29	1255.4	1138.9	32352.1	29349.8	31	1043.6	946.8	38040.9	34510.7	31	1227.1	1113.2	36105.2	32754.6	31	1164.7	1056.6	34155.6	30986.0	31	1101.8	999.5
Aug	33385.7	30287.51	31	1077.0	977.0	32401.3	29394.5	31	1045.2	948.2	32835.1	29788.0	30	1094.5	992.9	35604.7	32300.6	31	1148.5	1042.0	30088.9	27296.7	29	1037.5	941.3
Sep	34886.8	31649.3	30	1162.9	1055.0	32568.1	29545.8	30	1085.6	984.9	34036.4	30877.8	30	1134.5	1029.3	35471.2	32179.5	30	1182.4	1072.6	31203.9	28308.2	30	1040.1	943.6
Oct	33786.1	30650.75	31	1089.9	988.7	36005.1	32663.8	31	1161.5	1053.7	31633.8	28698.2	31	1020.4	925.7	33185.5	30105.9	31	1070.5	971.2	31801.8	28850.6	31	1025.9	930.7
Nov	29664.8	26911.91	28	1059.5	961.1	34870.6	31634.6	30	1162.4	1054.5	33852.8	30711.3	30	1128.4	1023.7	33202.1	30120.9	30	1106.7	1004.0	31121.2	28233.2	30	1037.4	941.1
Dec	21939.3	19903.33	25	877.6	796.1	32751.3	29712.0	31	1056.5	958.5	36956.1	33526.6	31	1192.1	1081.5	33268.9	30181.5	31	1073.2	973.6	27914.4	25323.9	31	900.5	816.9
Total Tons	392034.1					400909.5					392001.8					394354.3					360108.4				
Total Days	354					363					346					353					350				
Tons/Davg	1107.4					1104.4					1133.0					1117.2					1028.9				
Total Tonne	355653.34					363705.1					355624.03					357758.22					326690.34				
Tonne/Davg	1004.7					1001.9					1027.8					1013.5					933.4				

Highlighted are Production (Dec 2005 - Nov 2006) 377813.3 Tonne
Operating Days 362
Annual Production divided by operating days 1043.7 Tonne/Day

↑ Doesn't Match APP. 2C.

DSN001B Unbleached Softwood Pulp Production

	2005					2006					2007					2008					2009				
	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day	Ton	Tonne	Operating Days	Tons/Day	Tonne/Day
Jan	16846.1	15282.7	31	543.4	493.0	17765.1	16116.5	29	612.6	555.7	8637.2	7835.7	15	575.8	522.4	18280	16583.6	31	589.7	535.0	12783.3	11597.0	31	412.4	374.1
Feb	15680.5	14225.4	28	560.0	508.0	17254.7	15653.5	28	616.2	559.1	8866.9	8044.1	23	385.5	349.7	16841.2	15278.3	29	580.7	526.8	13145.1	11925.2	28	469.5	425.9
Mar	18072.7	16395.6	31	583.0	528.9	19787.9	17951.6	31	638.3	579.1	17022.2	15442.5	31	549.1	498.1	8513	7723.0	19	448.1	406.5	7582.1	6878.5	19	399.1	362.0
Apr	16633.8	15090.1	30	554.5	503.0	19398.8	17598.6	30	646.6	586.6	18320.3	16620.2	30	610.7	554.0	15341.4	13917.7	30	511.4	463.9	13789.5	12509.8	30	459.7	417.0
May	18053.2	16377.9	30	601.8	545.9	18900	17146.1	31	609.7	553.1	17635.3	15998.7	31	568.9	516.1	14342.6	13011.6	31	462.7	419.7	13018.6	11810.5	30	434.0	393.7
Jun	16384.8	14864.2	30	546.2	495.5	17224.1	15625.7	30	574.1	520.9	16877.7	15311.4	29	582.0	528.0	14674	13312.3	30	489.1	443.7	12627.1	11455.3	30	420.9	381.8
Jul	15171.7	13763.7	29	523.2	474.6	18455.5	16742.8	31	595.3	540.1	19785.4	17949.3	31	638.2	579.0	15849.8	14378.9	31	511.3	463.8	14798.2	13424.9	31	477.4	433.1
Aug	18190.9	16502.8	31	586.8	532.3	16535.2	15000.7	29	570.2	517.3	17535.6	15908.3	30	584.5	530.3	17868.2	16210.0	31	576.4	522.9	13687.4	12417.2	30	456.2	413.9
Sep	16571.8	15033.9	30	552.4	501.1	19348.1	17552.6	30	644.9	585.1	18463.7	16750.3	30	615.5	558.3	17217.7	15619.9	30	573.9	520.7	15999.5	14514.7	30	533.3	483.8
Oct	19661.7	17837.1	31	634.2	575.4	19458.3	17652.6	31	627.7	569.4	19108.7	17335.4	31	616.4	559.2	14878.8	13498.0	31	480.0	435.4	14081.2	12774.5	30	469.4	425.8
Nov	15192.1	13782.3	28	542.6	492.2	18770.7	17028.8	30	625.7	567.6	15188.5	13779.0	29	523.7	475.1	14289	12963.0	29	492.7	447.0	14804.6	13430.7	30	493.5	447.7
Dec	10719.3	9724.6	25	428.8	389.0	17764.9	16116.3	31	573.1	519.9	19348.5	17553.0	31	624.1	566.2	14207.6	12889.1	31	458.3	415.8	12910.7	9724.58	31	416.5	313.7
Total Tons	197178.5					220663.3					196790					182303.3					159227.3				
Total Days	354					361					341					353					350				
Tons/Davg	557.0					611.3					577.1					516.4					454.9				
Total Tonne	178880.3					200185.75					178527.89					165385.55					142463				
Tonne/Davg	505.3					554.5					523.5					468.5					407.0				

Highlighted are Production (Dec 2005 - Nov 2006) 193794.0 Tonne
Operating Days 355
Annual Production divided by operating days 545.9 Tonne/Day

0.40

ATTACHMENT 5

Biocides:

BULAB 6038

1. Aquatic Toxicity – 96 hour LC50 in Fish
   Freshwater
   Rainbow Trout: 0.87 mg/L
   Fathead Minnow: 2.25 mg/L
   Saltwater:
   Grass Shrimp: 13.0 mg/L
   Sheepshead Minnow: 20.0 mg/L
   American Oyster: >640 mg/L
   Aquatic Toxicity – 48 hour LC50
   Daphnia Magna: 0.48 mg/L
2. Quantity – 2,500 lbs annually
3. Frequency – Intermittent
4. Estimated Discharge Concentration (DSN001) – 0.03 PPM
5. EPA Registration Number – 1448-420

BUSAN 1078

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Freshwater:
   Rainbow Trout: 0.19mg/L
   Bluegill Sunfish 0.28 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: 0.16 mg/L
2. Quantity – 30,000 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) - 0.007 PPM
5. EPA Registration Number – 1448-348

BUSAN 1125C

1. Aquatic Toxicity – No information available
2. Quantity – 250,000 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) – expected to 0
5. EPA Registration Number – 1448-20001

BUSAN 1167

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Freshwater:
   Rainbow Trout: > 1,000 mg/L
   Bluegill Sunfish > 1,000 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: > 1,000 mg/L

2. Quantity – 200,000 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) - 0.04 PPM
5. EPA Registration Number – 1448-345

BUSAN 1210

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Freshwater:
   Rainbow Trout: 0.025 mg/L
   Bluegill Sunfish 0.057 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: 0.14 mg/L
2. Quantity – 30,000 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) - 0.007 PPM
5. EPA Registration Number – 1448-348

BUSAN 1223

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Freshwater:
   Rainbow Trout: 21 µg/L
   Bluegill Sunfish 8.7 µg/L
   Chinook Salmon 2.1 µg/L
   Saltwater:
   Mysid Shrimp: 21 µg/L
   Sheepshead Minnow 60 µg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: 22 µg/L
   Quahog clam: 14 µg/L
2. Quantity – 12,933 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) - <0.1%
5. EPA Registration Number – 1448-81

BUSAN 1234

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 0.23 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna 0.011 mg/L
2. Quantity – 18,000 lbs annually
3. Frequency – Intermittent
4. Estimated Discharge Concentration (DSN001) – 0.13 PPM
5. EPA Registration Number – 1448-439

Stabrex ST70

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 4.5 mg/L
   Fathead Minnow 8.3 mg/L
   Mysid Shrimp 27 mg/l
   Sheepshead Minnow 16 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna 4.2 mg/L
2. Quantity – 36,778 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) – 0.272
5. EPA Registration Number – 1706-179

NALCO 7330

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 12.67 mg/L
   Bluegill Sunfish 18.67 mg/L
   Mysid Shrimp 18 mg/l
   Sheepshead Minnow 32 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna 8.7 - 12 mg/L
2. Quantity – 2,000 lbs annually
3. Frequency – Daily
4. Estimated Discharge Concentration (DSN001) – > 0.1 PPM
5. EPA Registration Number – 1706-153

Corrosion Inhibitors:

3D Trasar® 3DT104

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Fathead Minnow 1,278 mg/L
   Rainbow Trout 450 mg/L
   Mysid Shrimp 3,536 mg/L

   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna 844 mg/L
2. Annual Quantity – 61,000 lbs
3. Frequency – Continuous
4. Estimated Discharge Concentration (DSN001) – 0.5 PPM
5. EPA Registration Number – N/A

Nalco 23268

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Fathead Minnow 710 mg/L
   Rainbow Trout 418 mg/L
   Bluegill Sunfish > 1,000 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna > 1,000 mg/L
   Ceriodaphnia dubia > 1,000 mg/L
2. Annual Quantity – 61,000 lbs
3. Frequency – Continuous
4. Estimated Discharge Concentration (DSN001) – 0.5 PPM
5. EPA Registration Number – N/A

Nalco 359

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 100 – 1,000 mg/L
   Bluegill Sunfish 100 - 1,000 mg/L
2. Annual Quantity – 50,000 lbs
3. Frequency – Continuous
4. Estimated Discharge Concentration (DSN001) – 0.01 PPM
5. EPA Registration Number – N/A

Nalco 7384

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 38 mg/L
   Fathead minnow 303 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: 250 mg/l
2. Annual Quantity – 1,000 lbs
3. Frequency – Intermittent
4. Estimated Discharge Concentration (DSN001) – 0.02 PPM
5. EPA Registration Number – N/A

Nalco 8338

1. Aquatic Toxicity – 96 Hour LC50 in Fish
   Rainbow Trout 0.8 – 1.8 mg/L
   Bluegill Sunfish 5 – 18.5 mg/L
   Aquatic Toxicity – 48 Hour LC50
   Daphnia magna: 0.15 – 0.9 mg/l
2. Annual Quantity – 80,000 lbs
3. Frequency – Continuous
4. Estimated Discharge Concentration (DSN001) – 0.0003 PPM
5. EPA Registration Number – N/A

Georgia-Pacific
Consumer Products LP

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
kelvin.hill@gapac.com

Kelvin J. Hill
Vice President, Naheola Operations

February 4, 2013

Mrs. Kimberly Minton
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130

RE: NPDES Permit AL0003301

Dear Mrs. Minton,

Enclosed is an update to the Georgia-Pacific Consumer Products LP National Pollution Discharge Elimination System permit application. The update is an addition to Section C, Part 5, biocides and inhibitors. We plan to use Tri-ACT®1820 as a corrosion inhibitor once approved.

We look forward to your written approval.

If you have any questions or require further information, please contact Daniel Hall at (205) 459-1123.

Sincerely,

Kelvin J. Hill
Vice President, Naheola Operations

enclosure

INFORMATION PROVIDED BY NALCO COMPANY

Product: **Tri-ACT®1820**

1. Aquatic Toxicity in Fish

   Acute Fish Results:

Fathead Minnow	75 mg/l (96 Hours/ LC50)
Rainbow Trout	130 mg/l (96 hours/LC50)
Sheepshead Minnow	454 mg/l (96 hours/LC50)
Inland Silverside	500 mg/l (96 hours/LC50)

   Acute Invertebrate Results:

Daphnia magna	190 mg/l (48 Hours/LC 50)
Mysid Shrimp	131 mg/l (96 hours/LC 50)

2. Annual Quantity : 100,000 lbs
3. Frequency : Continuous
4. Discharge Concentration (DSN001) : .67 ppm*
5. EPA Registration : N/A

* Calculation based of the average annual 2012 discharge flow of 48.67 MG for the Georgia-Pacific Consumer Products LP, NPDES Permit AL0003301 permitted DSN001 outfall.

Georgia-Pacific
Consumer Products LP

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
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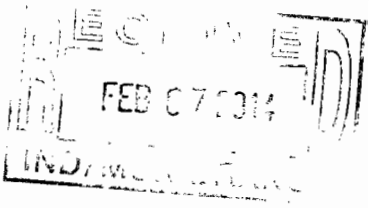
Kelvin J. Hill
Vice President, Naheola Operations

February 3, 2014



Mrs. Kimberly Minton
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130

RE: NPDES Permit AL0003301

Dear Mrs. Minton,

Enclosed is an update to the Georgia-Pacific Consumer Products LP National Pollution Discharge Elimination System permit application. The update is an addition to Section C, Part 5, biocides and inhibitors. We plan to use Bulab 6057® as a biocide once approved.

We look forward to your written approval.

If you have any questions or require further information, please contact Daniel Hall at (205) 459-1123.

Sincerely,

Ron Grantham for Kelvin J. Hill

Kelvin J. Hill
Vice President, Naheola Operations

enclosure

INFORMATION PROVIDED BY NALCO COMPANY

Product: **Bulab 6057® (Biocide)**

1. Aquatic Toxicity in Fish

   Acute Fish Results

Bluegill Sunfish	0.28 mg/l (96 Hours)
Rainbow Trout	0.19 mg/l (96 Hours)

   Acute Invertebrate Results

Daphnia magna	0.16 mg/l (48 Hours)

2. Annual Quantity 21,900 lbs estimated.
3. Frequency Continuous
4. Discharge Concentration (DSN001) 0.15 PPM*
5. EPA Registration Number 1448-348

* Calculation based of the average annual 2013 discharge flow of 47,941,700 MGD for the Georgia-Pacific Consumer Products LP, NPDES Permit AL0003301 permitted DSN001 outfall.

Georgia-Pacific
Consumer Products LP

7530 Highway 114
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Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
kelvin.hill@gapac.com

Kelvin J. Hill
Vice President, Naheola Operations

October 24, 2012

Mr. Donald Brown
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130

RE: NPDES Permit AL0003301

Dear Mr. Brown,

Enclosed is an update to the Georgia-Pacific Consumer Products LP National Pollution Discharge Elimination System permit application. The update is an addition to Section C, Part 5, biocides and inhibitors. We plan to use TRASAR® 22141 and 3DTRASAR®3D289 as a corrosion inhibitor once approved.

We look forward to your written approval.

If you have any questions or require further information, please contact Daniel Hall at (205) 459-1123.

Sincerely,

Kelvin J. Hill
Vice President, Naheola Operations

enclosure

INFORMATION PROVIDED BY NALCO COMPANY

Product: **TRASAR® 22141**

1. Aquatic Toxicity in Fish

   Acute Fish Results:
   Fathead Minnow 5,838.3 mg/l (96 Hours/ LC50)

   Acute Invertebrate Results:
   Ceriodaphnia dubia 2,968 mg/l (96 Hours/LC 50)

2. Annual Quantity : 82,720 lbs
3. Frequency : Continuous
4. Discharge Concentration (DSN001) : .57 ppm*
5. EPA Registration : N/A

* Calculation based of the average annual 2011 discharge flow of 47.47 MG for the Georgia-Pacific Consumer Products LP, NPDES Permit AL0003301 permitted DSN001 outfall.

Product: **3D TRASAR® 3DT289**

1. Aquatic Toxicity in Fish

Acute Fish Results:
Fathead Minnow 3,750 mg/l (96 Hours/ LC 50)
Rainbow Trout 1,830 mg/l (96 Hours/ LC 50)

Acute Invertebrate Results:
Ceriodaphnia dubia 1,875 mg/l (48 Hours/LC50)
Daphinia Magna 1,908 mg/l (48 Hours/ EC50)

2. Annual Quantity: 75,000 lbs.
3. Frequency: Continuous
4. Discharge Concentration (DSN001): .52 ppm*
5. EPA Registration: N/A

* Calculation based of the average annual 2011 discharge flow of 47.47 MG for the Georgia-Pacific Consumer Products LP, NPDES Permit AL0003301 permitted DSN001 outfall.

Georgia-Pacific

Georgia-Pacific
Consumer Products LP

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
Kelvin.Hill@gapac.com

Kelvin J. Hill
V.P., Naheola Operations

September 17, 2010

Mr. Donald Brown
Alabama Department of Environmental Management
Industrial Water Section
1400 Coliseum Boulevard
P. O. Box 301463
Montgomery, Alabama 36130-1463

Subject: NDPES Permit Renewal Application
NPDES Permit No. AL0003301
Georgia-Pacific Consumer Products LP

Dear Mr. Brown:

As required by the current NPDES permit that expires on March 31, 2011, we are submitting the attached renewal application. As part of this renewal package, we are including additional information, or making certain requests as outlined below:

- We are requesting monitoring frequency reductions for Outfall DSN001 for Absorbable Organic Halogens (AOX). Based on our monitoring data over the last term of the permit, we have had no exceedences of the permit limits. The monitoring frequency of the current permit is one sample weekly. Our average over the last two years for AOX is 25 percent of the monthly average limit. We request the frequency be revised to 2 samples per month as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

- We are requesting monitoring frequency reductions for internal Outfalls DSN001A and DSN001B for Chloroform which is monitored once per month. Based on our monitoring data over the last two year period, we have had no exceedances for DSN001A and one exceedance for DSN001B. Our long term average for DSN001A is 28 percent and DSN001B is 37 percent of their monthly average permit limits. We are requesting the frequency be revised to once per quarter as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

- We are requesting monitoring frequency reductions for internal Outfalls DSN001A and DSN001B for Chlorinated Phenolics and TCDD and TCDF Dioxin which is monitored once per quarter. Based on our monitoring data over the last two year period, we have

had no exceedences of the permit limits and tests have been below the analytical detection limits for each test. We are requesting the frequency be revised to 1 every 6 months as allowed under EPA's *Interim Guidance for Performance-Based Reductions of NPDES Monitoring Frequencies.* We have attached the data showing the long term average.

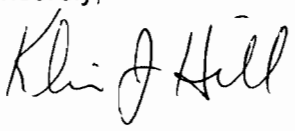
- We are requesting to discontinuance of the Dioxin Fish Tissue Monitoring and Analysis. Previous monitoring data collected during the last five years were below detectible limits for both the predator and omnivore species.

- We are requesting, dependant upon installation, the use of data (river flow, dissolved oxygen, and temperature) from a USGS Monitoring Station that may be located at the Highway 114 Bridge crossing the Tombigbee River. This potential monitoring station is located approximately at river mile 173.4. If in the event the station is not installed or issues with the station prevent the collection of river data, the river flow and temperature will be obtained from the Demopolis Lock and Dam, and the dissolved oxygen will be measured at the mill's water intake structure.

We will be submitting, in a separate submittal, all the river water quality data collected for use in a water quality model for the Tombigbee River. A low flow event occurred in July and data was collected at that time. We are still awaiting the results of the long term BOD tests that were setup at the time.

We appreciate the opportunity to submit these requests and are available to discuss these requests further. Should you have any questions with the permit applications, or on any of the contents of the permit renewal package, please contact Shawn Williams at (205) 459-1568.

Sincerely,



Kelvin J. Hill
V.P., Naheola Operations

Attachment: Historical test data

Historical Test Data

Outfall Number: DSN001
Parameter: AOX (Absorbable Organic Halogens)

Month	2008	2009
Jan	920	654
Feb	671	711
March	527	381
April	518	705
May	513	518
June	395	402
July	484	348
Aug	454	473
Sep	464	431
Oct	503	523
Nov	615	576
Dec	788	615

2 year average	549.5
Permit limit	2185.0
Percent of permit	25.2

Outfall Number: DSN001A and DSN001B
Parameter: Chloroform

	2008					
	HW (DSN001A)			SW (DSN001B)		
Month	Avg	Permit Limit	% of Permit	Avg	Permit Limit	% of Permit
Jan	2.02	9.56	21.1	1.3	4.95	26.3
Feb	1.38	10.02	13.8	0.77	4.95	15.6
March	1.61	9.56	16.8	1.21	4.95	24.4
April	2.61	10.02	26.0	2.95	4.95	59.6
May	2.48	10.02	24.8	3.04	4.95	61.4
June	3.41	9.56	35.7	3.15	4.95	63.6
July	6.88	10.02	68.7	2.64	4.95	53.3
Aug	1.18	10.02	11.8	1.3	4.95	26.3
Sep	2.15	10.02	21.5	0.89	4.95	18.0
Oct	2.15	9.56	22.5	1.92	4.95	38.8
Nov	2.64	10.02	26.3	1.85	4.95	37.4
Dec	2.11	9.56	22.1	1.8	4.95	36.4

	2009					
	HW (DSN001A)			SW (DSN001B)		
Month	Avg	Permit Limit	% of Permit	Avg	Permit Limit	% of Permit
Jan	1.82	9.56	19.0	1.98	4.95	40.0
Feb	3.01	10.02	30.0	1.33	4.95	26.9
March	2.48	9.56	25.9	2.72	4.95	54.9
April	4.97	10.02	49.6	2.65	4.95	53.5
May	3.03	9.56	31.7	1.93	4.95	39.0
June	2.85	9.56	29.8	1.81	4.95	36.6
July	2.09	10.02	20.9	1.34	4.95	27.1
Aug	2.96	9.56	31.0	1.26	4.95	25.5
Sep	2.64	9.56	27.6	0.74	4.95	14.9
Oct	4.5	9.56	47.1	2.21	4.95	44.6
Nov	2.76	9.56	28.9	1.65	4.95	33.3
Dec	2.25	9.56	23.5	1.33	4.95	26.9

HW Chloroform 2 year average	2.7
Percent of permit	28.2
SW Chloroform 2 year average	1.8
Percent of permit	36.8

Georgia-Pacific
Consumer Products LP

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
kelvin.hill@gapac.com

Kelvin J. Hill
Vice President, Naheola Operations

January 24, 2012

Mr. Donald Brown
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130

RE: NPDES Permit AL0003301

Dear Mr. Brown,

Enclosed is an update to the Georgia-Pacific Consumer Products LP National Pollution Discharge Elimination System permit application. The update is an addition to Section C, Part 5, biocides and inhibitors. We plan to use 3D TRASAR® 3DT102 as a corrosion inhibitor and NACLO® 7346 as a biocide once approved.

We look forward to your written approval.

If you have any questions or require further information, please contact Shawn Williams at (205) 459-1568.

Sincerely,

Kelvin J. Hill
Vice President, Naheola Operations

enclosure

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name of Responsible Official: Kelvin J. Hill

Title of Responsible Official: VP, Naheola Operations

Signature of Responsible Official: Kelvin J Hill

Date: 1/24/2012

INFORMATION PROVIDED BY NALCO COMPANY

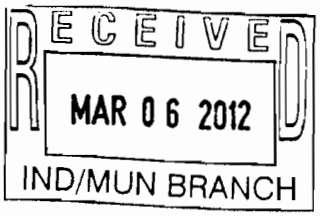
Product: **Nalco® 7346 TAB (Biocide)**

1. Aquatic Toxicity in Fish

   Acute Fish Results
   - Fathead Minnow 0.71 mg/l (96 Hours)
   - Rainbow Trout 0.5 mg/l (96 Hours)

   Acute Invertebrate Results
   - Daphnia magna 0.4 mg/l (48 Hours)
   - Mysid Shrimp 40.93 mg/l (96 Hours)

2. Annual Quantity 9,125 lbs
3. Frequency Continuous
4. Discharge Concentration (DSN001) 0.0631 PPM*
5. EPA Registration Number 6836-115-1706



Product: **3D TRASAR® 3DT102**

1. Aquatic Toxicity in Fish

   Acute Fish Results
   - Fathead Minnow 948 mg/l (96 Hours)
   - Rainbow Trout 4,884 mg/l (96 Hours)

   Acute Invertebrate Results
   - Daphnia magna 938 mg/l (48 hours)
   - Mysid Shrimp 3,750 mg/l (96 Hours)

2. Annual Quantity 91,250 lbs
3. Frequency Continuous
4. Discharge Concentration (DSN001) 0.631 PPM*
5. EPA Registration Number N/A

* Calculation based of the average annual 2011 discharge flow of 47.47 MG for the Georgia-Pacific Consumer Products LP, NPDES Permit AL0003301 permitted DSN001 outfall.

ATTACHMENT 6

Water Supply: Municipal Water Utility (Potable water)

City: Pennington Well: 0.04 MGD
Well Depth: #1 Well 228 feet, #2 Well 240 Feet

Latitude:	Longitude:
#1 Well 32°07'46	88°04'46
#2 Well 32°07'14	88°04'38

Water Supply: Water Intake Structure (Tombigbee River)

Top elevation of Screen: 40'-0"
Bottom elevation of Screen: 16'-6"
Intake Screen flow through area (entire screen): 431 square feet
Intake Flow Velocity (full screen coverage): 0.16 ft/sec

ATTACHMENT 7

Description of Waste	Quantity (lbs/day)	Disposal Method
Effluent Sludge	38,000	Onsite landfill, onsite sludge storage areas
Effluent Sludge	58,000	Onsite Sludge Ponds
Effluent Sludge	0 – 19,000	Offsite vendors (beneficial reuse)
Boiler ash	65,750	Onsite Ash Ponds, onsite Landfill
Filter plant backwash	531,000	Onsite #2 Sludge Pond*
Sanitary Solids	2,000**	Offsite (City of Meridian WWT)

*Decant is treated via the mill's wastewater treatment system
**Pounds per year

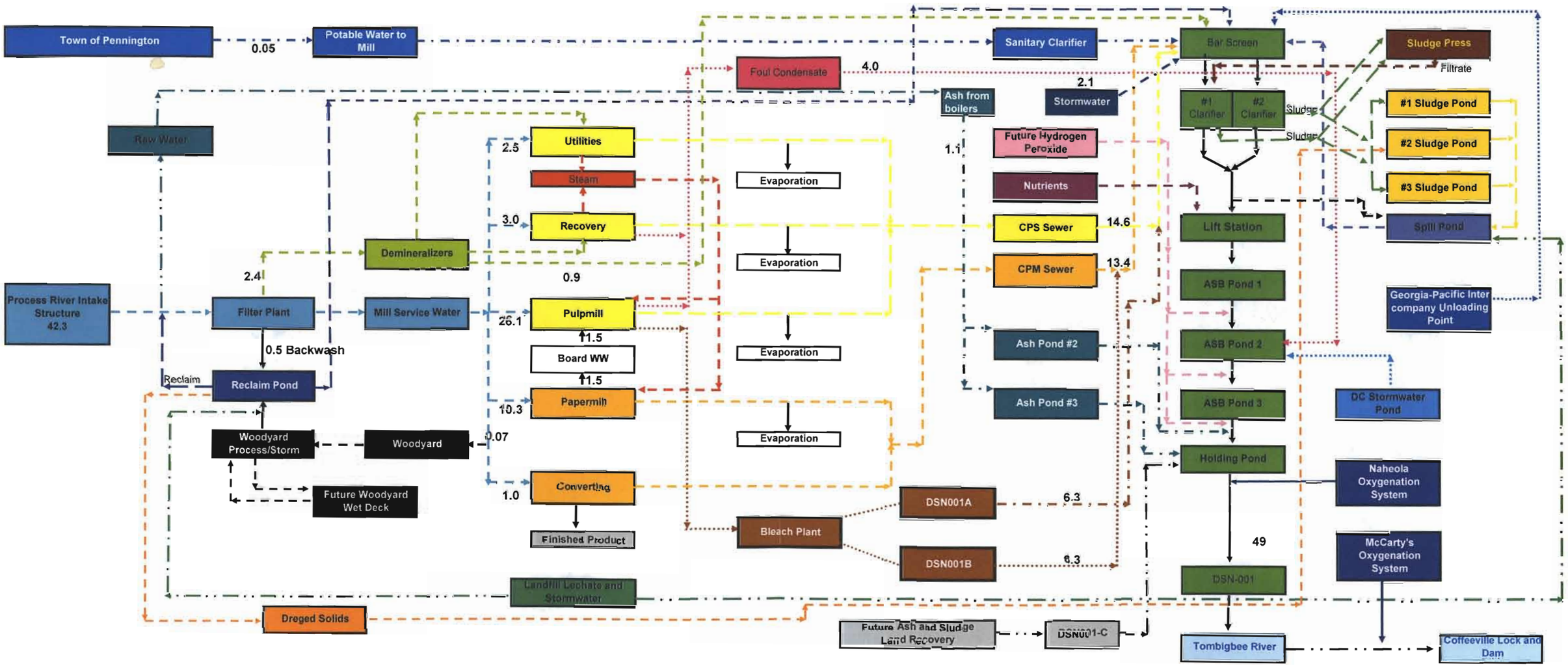
Water Line Diagram

Georgia-Pacific Consumer Products LP

NPDES Permit: AL0003301

Attachment 8

(All units in MGD, based on 2009 data)



ATTACHMENT 9

PROCESS CHEMICALS AND MATERIAL LIST

Process Materials:

- Bark
- Wood
- Pulp/Stock
- Coal
- Black liquor
- White Liquor
- Green Liquor
- Green liquor Dregs
- Lime Mud
- Soap
- Turpentine
- Starch
- Clay
- Smelt
- Foul Condensate
- Weak Wash
- Spent Acid
- Caustic
- Chlorine Dioxide

Specific Chemicals Used at the Mill

- Aluminum Sulfate (Alum)
- Calcium Hypochlorite
- Hydrochloric Acid
- Hydrogen Peroxide
- Methanol
- Phosphoric Acid
- Sodium Hydrosulfide
- Sodium Hydroxide
- Sodium Hypochlorite
- Sodium Hydrosulfide
- Sodium Bisulfite
- Sodium Chlorate

- Sodium Sulfate
- Sodium Sulfite
- Sulfuric Acid
- Urea
- Urea ammonia nitrate

General Classes of Chemicals Used at the Mill

- Polymers
- Retention Aids
- Slimicides
- Biocides
- Corrosion Inhibitors
- Emulsifiers
- Defoamers
- Sizing Agents
- Inks and Dyes
- Lubricating Oils and Greases
- Fuels
    - Gasoline
    - Diesel Fuel
    - Fuel oil, No. 2
    - Fuel oil, No. 6
    - Kerosene
    - Propane
    - Natural Gas
    - Coal

Note: This not meant to be an all inclusive list of every chemical used at the mill. However, it does outline the primary chemicals that may contribute to wastewater loads to the treatment system.

ATTACHMENT 10

Treatment Unit Capacities

Georgia-Pacific Consumer Products LP
NPDES Permit No. AL0003301

Treatment Unit	Size or Capacity
Sanitary Treatment Plant	100,000 gallons/day
Sludge Press	85 BD* tons/day
Sludge Pond #1	14 MG**
Sludge Pond #3	20 MG**
Primary Clarifier, #1	264 ft. diameter
Primary Clarifier, #2	225 ft. diameter

Treatment Unit	Size or Capacity	Retention Time, days (@49 MGD)
Spill Pond	35 MG**	0.71
Aeration basins (ASB #1, ASB #2, ASB #3)	279 MG***	7 days
Stabilization pond	85 MG***	2 days

* BD - Bone Dry
** Volumes are based on 2008 studies
*** Volumes are based on 2009 studies

The capacities for the Stabilization Pond were determined at a 6.8 foot pond level. The capacity and the retention times would be more or less based on height of the pond and the discharge rate.

ATTACHMENT 11

COOLING WATER SUPPLEMENTAL INFORMATION
ADEM Form 510

Facilities with cooling water discharges should answer the below question:

1) Does surface water intake total 2 mgd or more? [☑] Yes [☐] No

1a) Is 25% or more of the intake used for cooling purposes? [☐] Yes [☑] No

This form must be signed by the official representative of the facility who is: the owner, the sole proprietor of a sole proprietorship, a general partner for a partnership, or by a ranking elected official or other duly authorized representative for a unit of government or an executive officer of at least the level of vice president for a corporation, having overall responsibility for the operation of the facility.

CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Permit Number (*if already a permitted facility): AL0003301

Name and Official title (type or print): Kelvin J. Hill UP - NAHEOLA OPERATIONS

Address: 7530 Highway 114

Phone Number: (205) 459-1374

Signature: Kelvin J Hill

Please Print Name: KELVIN J. HILL

Date signed: 9/16/2010

ATTACHMENT 12

Biocide Certification

Georgia-Pacific Consumer Products LP
NPDES Permit No. AL0003301

In accordance with the requirements of 40 CFR 430.24(e), I hereby certify that the Georgia-Pacific Consumer Products LP mill does not utilize trichlorophenolic-containing or pentachlorophenolic-containing biocides in our process operations.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kelvin J Hill
Signature

9/16/2010
Date

Kelvin J. Hill, Vice President of Naheola Operations
Name and Title of Responsible Corporate Official

ATTACHMENT 13

Best Management Practices Implementation Certification

Georgia-Pacific Consumer Products LP
NPDES Permit No. AL0003301

In accordance with the requirements of 40 CFR 430.03, I hereby certify that the Georgia-Pacific Consumer Products LP mill has fully implemented all the listed requirements for preparation and implementation of its BMP Plan, and met all compliance deadlines for establishing and revising all action levels.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kln J Hill
Signature

9/16/2010
Date

Kelvin J. Hill, Vice President of Naheola Operations
Name and Title of Responsible Corporate Official

ATTACHMENT 14

Storm Water Calculation

Georgia-Pacific Consumer Products LP
NPDES Permit No. AL0003301

Average annual precipitation for mill site[1]	58 inches per year
Site area drainage to the wastewater treatment system	872 acres
Runoff coefficient for overall site[2]	0.43
Calculated total runoff per year to wastewater treatment system	1373 million gallons
Calculated daily average contribution to wastewater treatment system	**1.6 MGD**

[1] 5 year average of daily rainfall measurements collected at the mill site
[2] Runoff coefficient based on calculation of pervious/impervious areas for the site.

Note: The stormwater value reported on Form 2C was calculated for 2009 only

DSN001 Discharge to Tombigbee River

	2005	2006	2007	2008	2009
	MGD	MGD	MGD	MGD	MGD
Jan	45.8	47.2	34.9	48.8	46.1
Feb	50	46.2	42.1	48.6	47.9
Mar	45.2	43.4	43.3	37.6	41.3
Apr	49.3	44.7	45.1	46.2	52.3
May	46.8	45.7	44.7	48.6	49.6
Jun	50.4	41	44	43.1	46.8
Jul	50.5	39.8	45.3	43.9	44.7
Aug	48.2	37.1	39.3	48.8	52.5
Sep	50.6	37.8	44.1	52.1	51
Oct	48.9	41.4	42.5	45.2	51.1
Nov	49	40.4	43.4	46.6	50.9
Dec	43.5	44.3	43.1	45.4	53.6
Yearly Total	48.2	42.4	42.7	46.2	49.0

Highlighted is highest 12 Month Period (May 2005 - April 2006)	47.96 MGD
Last 12 Month Period Average (Jan 2009 - Dec 2009)	42.34 MGD
Highest Month in the Last Year (Jan 2009)	44.7 MGD
Highest Daily average last 12 Month Period (March 19, 2009)	53.49 MGD

Water Intake

	2005	2006	2007	2008	2009
	MGD	MGD	MGD	MGD	MGD
Jan	43.56	47.7	35	43.52	44.71
Feb	43.65	45.9	42.7	42.68	43.63
Mar	44.08	43.6	46.2	42.88	28.58
Apr	45.75	46.4	45	41.32	44.93
May	47.17	47.1	47.1	42.39	44.33
Jun	48.2	47.8	47.8	51.33	41.21
Jul	49.42	47.4	48.8	43.05	44.69
Aug	51.53	44.8	43	42.51	43.25
Sep	50.33	45.9	43.8	44.16	42.02
Oct	51.23	43.7	42.6	43.08	44.29
Nov	49.08	42.4	43.1	44.08	44.1
Dec	44.97	44.9	43.9	41.73	42.39
Yearly Total	47.41	45.63	44.08	43.56	42.34

Highlighted is highest 12 Month Period (May 2005 - April 2006)	47.96 MGD
Last 12 Month Period Average (Jan 2009 - Dec 2009)	42.34 MGD
Highest Month in the Last Year (Jan 2009)	44.7 MGD
Highest Daily average last 12 Month Period (March 19, 2009)	53.49 MGD

TABLE E-1. PREDICTED BOD_5 LOADINGS

TEMPERATURE (°C)	FLOW (cfs)			
	900	1,500	3,000	5,100
22	17,915	25,458	37,479	49,973
24	16,265	23,101	33,001	43,372
26	14,850	20,979	28,758	37,479
28	13,436	19,093	24,986	31,351
30	12,257	17,208	21,451	26,165
32	11,315	15,558	18,150	20,979

TABLE E-2. CURRENT NPDES PERMIT BOD_5 LOADING VERSUS NEW MODEL PREDICTED LOADING

TEMPERATURE (°C)	LOADING AT FLOW OF __ CFS (lbs/day)							
	900		1,500		3,000		5,100	
	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions
22	6,890	17,915	10,603	25,458	13,279	37,479	19,683	49,973
24	6,097	16,265	9,424	23,101	11,098	33,001	16,364	43,372
26	5,241	14,850	8,142	20,979	9,008	28,758	13,225	37,479
28	4,258	13,436	6,674	19,093	6,944	24,986	10,162	31,351
30	3,064	12,257	4,892	17,208	4,854	21,451	7,131	26,165
32	1,532	11,315	2,604	15,558	2,636	18,150	4,018	20,979

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28	13,436	19,093	24,986	31,351
30	12,257	17,208	21,451	26,165
32	11,315	15,558	18,150	20,979

Need's a footnote
+ yes or no
with Eql limits

TABLE E-2. CURRENT NPDES PERMIT BOD_5 LOADING VERSUS NEW MODEL PREDICTED LOADING

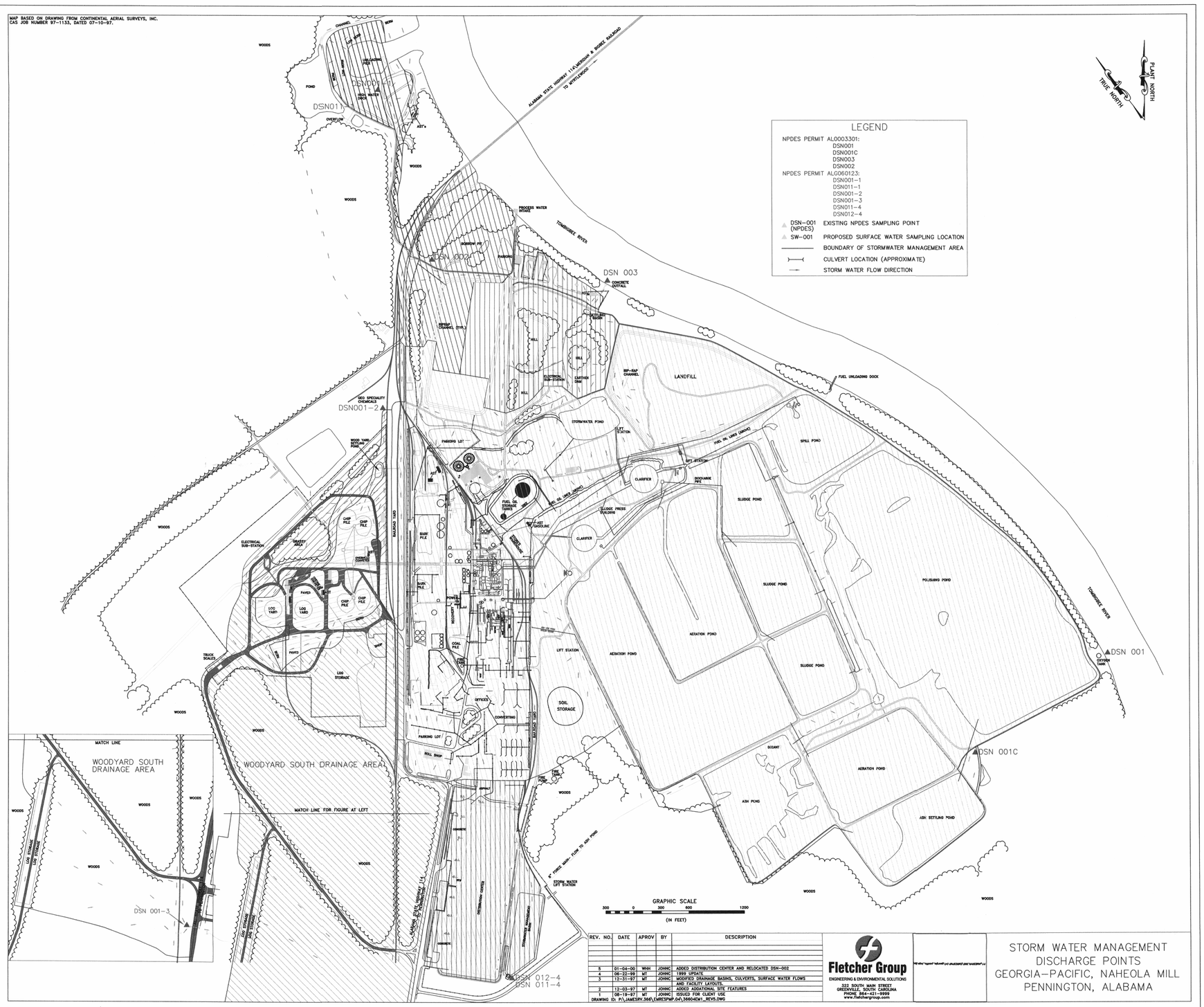
TEMPERATURE (°C)	LOADING AT FLOW OF __ CFS (lbs/day)							
	900		1,500		3,000		5,100	
	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions	Existing NPDES Permit Look-up Table	New Model Predictions
22	6,890	17,915	10,603	25,458	13,279	37,479	19,683	49,973
24	6,097	16,265	9,424	23,101	11,098	33,001	16,364	43,372
26	5,241	14,850	8,142	20,979	9,008	28,758	13,225	37,479
28	4,258	13,436	6,674	19,093	6,944	24,986	10,162	31,351
30	3,064	12,257	4,892	17,208	4,854	21,451	7,131	26,165
32	1,532	11,315	2,604	15,558	2,636	18,150	4,018	20,979

2010 Permit Renewal
NPDES Permit # AL0003301

September 17, 2010

Georgia-Pacific Consumer Products LP
7530 Highway 114
Pennington, Alabama 36916

MAP BASED ON DRAWING FROM CONTINENTAL AERIAL SURVEYS, INC.
CAS JOB NUMBER 97-1133, DATED 07-10-97.



LEGEND

NPDES PERMIT AL0003301:
- DSN001
- DSN001C
- DSN003
- DSN002

NPDES PERMIT ALG060123:
- DSN001-1
- DSN011-1
- DSN001-2
- DSN001-3
- DSN011-4
- DSN012-4

DSN-001 (NPDES) — EXISTING NPDES SAMPLING POINT

SW-001 — PROPOSED SURFACE WATER SAMPLING LOCATION

BOUNDARY OF STORMWATER MANAGEMENT AREA

CULVERT LOCATION (APPROXIMATE)

STORM WATER FLOW DIRECTION

REV. NO.	DATE	APROV	BY	DESCRIPTION
5	01-04-00	WHH	JOHNC	ADDED DISTRIBUTION CENTER AND RELOCATED DSN-002
4	05-22-99	MT	JOHNC	1999 UPDATE
3	12-31-97	MT	JOHNC	MODIFIED DRAINAGE BASINS, CULVERTS, SURFACE WATER FLOWS AND FACILITY LAYOUTS.
2	12-03-97	MT	JOHNC	ADDED ADDATIONAL SITE FEATURES
1	08-19-97	MT	JOHNC	ISSUED FOR CLIENT USE

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