



Georgia-Pacific

Georgia-Pacific LLC

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March 23, 2021

United States Department of Justice
EES Case management Unit
Re: DOJ # 90-5-2-1-11705
Eescdcopy.enrd@usdoj.gov

United States Environmental Protection Agency
Consent Decree Reporting System
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Mr. Tom Rheaume
Arkansas Department of Environmental Quality
rheaume@adeq.state.ar.us

RE: *United States v. Georgia-Pacific Chemicals LLC, et al.*
Case No. 1:18-cv-01076-SOH
Request for Extension of SEP Deadlines

To Whom It May Concern:

Pursuant to Section I.B of Appendix C of the Amended Consent Decree in the above-referenced matter, Georgia-Pacific Consumer Operations LLC and Georgia-Pacific Chemicals LLC (the "Settling Defendants") hereby request an extension of certain deadlines for two of the three Supplemental Environmental Projects ("SEP"). Specifically, the Settling Defendants request an additional 180 days to begin operation of the Epichlorohydrin Storage Tank ("Epi Storage SEP") and Vacuum Pump System Replacement ("Vacuum Pump SEP") SEPs.

As previously noted in prior semi-annual progress reports, the Settling Defendants have taken a number of actions to implement the SEPs set forth in the Amended Consent Decree:

- The City of Crossett Fire Department Emergency Response Vehicle SEP was completed on July 10, 2020.
- Permit applications for both the Epi Storage SEP and Vacuum Pump SEP were submitted in a timely fashion, and Arkansas Department of Environmental Quality ("ADEQ") has issued approval letters for both projects.
- Preliminary civil, mechanical, and electrical designs have been completed for both the Epi Storage SEP and Vacuum Pump SEP, and the Settling Defendants continue to engage with engineering contractors on the design and implementation of both SEPs.

Notwithstanding this progress, the Settling Defendants anticipate additional time will be needed to make the Epi Storage SEP and the Vacuum Pump SEP fully operational in accordance with the requirements of the Amended Consent Decree. Some of this additional time is anticipated as a result of pressures placed on the market for equipment and services associated with the COVID-19 pandemic. Delivery of some of the equipment has been longer than usual. The supply chain is being stressed, which impacts equipment suppliers. Additionally, there have also been delays due to the severe winter storm that impacted the Gulf Coast and South Central states in February.

Per the current terms of the Amended Consent Decree, both the Epi Storage SEP and the Vacuum Pump SEP must begin operation by June 12, 2021 (i.e., 270 days after receipt of the necessary permits). Section I.B. of Appendix C of the Amended Consent Decree provides that SEP compliance deadlines may be extended by written, mutual agreement between the United States and Settling Defendants. For the reasons stated above, the Settling Defendants respectfully request an additional 180 days, or until December 9, 2021, to begin operation of both SEPs.

If you have any questions regarding this submittal, please feel free to contact Jerry Morris, Environmental Manager, via telephone at (870) 567-7247 or via email at jwmorris@gapac.com.

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 our knowledge and believe, 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.

Best regards,



Tommy D. Smith
Vice President – Manufacturing
Georgia-Pacific Consumer Operations LLC
– Crossett Paper Operations



Bryan Grunsky
Complex Manager – Manufacturing
Administrator
Georgia-Pacific Chemicals LLC – Crossett
Chemicals

cc: Ms. Cheryl Barnett, EPA (via e-mail: Barnett.Cheryl@epa.gov)