

ILLINOIS POLLUTION CONTROL BOARD
April 5, 1984

GEORGIA-PACIFIC CORPORATION)
)
 Petitioner,)
)
 v.) PCB 83-179
)
ENVIRONMENTAL PROTECTION AGENCY)

MR. GARY KING (ATTORNEY AT LAW) APPEARED ON BEHALF OF THE
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY;

MS. SARA SADLER TURNIPSEED (ATTORNEY AT LAW) APPEARED ON BEHALF
OF GEORGIA-PACIFIC.

OPINION AND ORDER OF THE BOARD (by J. D. Dumelle):

This matter comes before the Board upon a November 30, 1983 petition and a December 30, 1983 amended petition for variance filed on behalf of the Georgia-Pacific Corporation requesting relief from a Board Order requiring a particular plan for closure of its wastewater lagoon system. On January 11, 1984, the Illinois Environmental Protection Agency (Agency) filed a recommendation that variance be granted subject to certain conditions. Hearing was held on February 23, 1984 at which the parties, but no members of the public, appeared.

Georgia-Pacific owns and operates a paper mill located in Taylorville, Christian County which manufactures fine grade papers including stationery, envelope stock, ledger paper, and associated products from cellulose pulp received from other mills. The plant produces about 100 tons of paper per day utilizing fresh water from private wells on the property and water from the City of Taylorville in the plant boilers and for backup service. Wastewater results from excess in the paper-making process, pump seal water, hose and pipe leakage, and cooling water. Sanitary wastewater is discharged to a City sanitary sewer.

The wastewater flows approximately 2½ miles to wastewater treatment facilities. During the period of October, 1982 to September, 1983, the flow averaged 0.853 mgd, BOD averaged 76 mg/l and TSS averaged 29 mg/l. Pursuant to a settlement in PCB 76-241, Georgia-Pacific has been building a series of lagoons each of about 0.75 acres in size which are used as presettling

ponds and which are closed, dewatered and covered when they become filled with sludge. The wastewater is then treated in settling basins "D" and "E₃" followed by a 25-acre aerated lagoon (Lagoon two) with a discharge to a small tributary to the South Fork of the Sangamon River.

On April 2, 1981, the Board, in PCB 76-241, (41PCB151) found Georgia-Pacific in violation of Rule 102 of Chapter 2, Rules 402, 410(a), and 901 of Chapter 3, and Sections 9(a), 12(a), 12(b), and 12(f) of the Environmental Protection Act. The Board ordered Georgia-Pacific to comply with all the terms and conditions of the Stipulation and Proposal for Settlement filed on December 30, 1980. Under the terms of the Settlement, Georgia-Pacific agreed to discontinue the use of the wastewater lagoon facility as soon as the wastewater from the paper mill could be diverted to the Taylorville Sanitary District, which was issued a federal construction grant on November 13, 1981, in the amount of \$2,542,575 for expansion and upgrading of the District's facility. The remaining local share of the project was to be paid by Georgia-Pacific under the terms of an agreement with the District.

Construction on this project has been substantially completed, although a number of operational items have to be resolved before diversion of the Georgia-Pacific effluent to the District's facilities can begin. The most current projection in the record is that diversion was to have begun between January 15, 1984 and February 1, 1984.

Georgia-Pacific requests that Paragraph E of the Proposal for Settlement as incorporated into the Board's April 2, 1981 Order be modified to allow Georgia-Pacific to utilize a more practical and cost effective method of closure of lagoon two. The proposal also incorporates a method to dewater Basins D and E₃ to enable compliance with Paragraph D.ii of that Order.

The materials treated in the settling basin portion of the waste treatment system are approximately 700,000 gallons of papermill effluent per day containing 10,000 pounds of suspended solids and 5,000 pounds of BOD. This material is treated in these basins to remove the suspended solids and a portion of the BOD. The materials discharged from the settling basins into the aerated basin for treatment are comprised of approximately 700,000 gallons per day of clarified effluent containing approximately 450 pounds of total suspended solids and 2,400 pounds of BOD. The discharge from lagoon two is to Flat Branch Creek tributary to South Fork River and consists of approximately 700,000 gallons per day containing 290 pounds of BOD and 230 pounds of suspended solids.

The Board's Order in 76-241 generally calls for covering abandoned sludge settling ponds and aerated basins with at least 1 foot of dirt and establishing a vegetative growth within 1 year of abandonment. Georgia-Pacific alleges that this closure method has proven impractical and overly expensive in that covering the 25-acre aerated basin (lagoon 2) with a minimum of 1 foot of dirt is virtually impossible. The amount of cover actually required has proven to be much more than anticipated in that it must be several feet thick in order to provide enough support for earth hauling equipment. Also, when attempting to cover the sludge in place in such a large area, Georgia-Pacific states that "the sludge oozes ahead of the fill being applied and ends up being entombed in a mound of dirt at the far edge of the basin." For these reasons, Georgia-Pacific proposes to remove the sludge from lagoon 2 and consolidate it into the E₃ settling basin, enabling all of the sludge to be covered in one area and permitting grading from this area outward and downward to the natural contours surrounding the site.

Georgia-Pacific further alleges that the closure cost pursuant to the Board's Order in PCB 76-241 is \$525,027 while the cost of the proposed closure plan is only \$196,960. Its Corporate Environmental Engineering Department has made an "extensive analysis" of environmentally acceptable and cost effective alternatives, but could not identify any. Finally, while alleging that granting of the variance will result in a beneficial environmental impact, Georgia-Pacific also agrees to monitor biochemical and chemical oxygen demand and suspended solids and to limit the discharge of BOD and SS to certain levels to minimize any adverse environmental impact.

The Agency agrees with Georgia-Pacific that the method of closure proposed in this proceeding is more practical and substantially more cost-effective than the method set forth in the Settlement, and that if variance is granted, the quality of the effluent should be unaffected. Therefore, the Agency believes that an unreasonable hardship would exist if variance were to be denied.

The Board concludes that denial of variance would impose an arbitrary and unreasonable hardship and also finds that the conditions which Georgia-Pacific and the Agency have agreed should be imposed upon the granting of variance are appropriate. The Board will, therefore, grant variance subject to conditions generally in accordance with Georgia-Pacific's variance request.

This Opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

The Georgia-Pacific Corporation is hereby granted variance from Paragraph E of the Stipulation and Proposal for Settlement filed December 30, 1980 in PCB 76-241 which is incorporated by reference in Condition E of the Board's April 2, 1981 Order in that matter, subject to the following conditions:

1. This variance shall expire December 31, 1984 or upon completion of Conditions 3, 4 and 5, below;
2. Georgia-Pacific shall cease discharging to its lagoon facilities once connection to Taylorville Sanitary District facilities is achieved and the District accepts full diversion of flows from Georgia-Pacific's paper mill;
3. By April 30, 1984 Georgia-Pacific shall:
 - a. Divert the flow from the "Hopper Sewer" into the existing drainage ditch;
 - b. Install drain pits in the dike between "C" and "D";
 - c. Install drain pits in the dike between "D" and "E₃";
 - d. Dewater "C" and "D" by pumping excess water to lagoon 2;
 - e. Pump free water from "E₃" as needed to lagoon 2;
 - f. Relocate two aerators in lagoon 2 toward the discharge end of lagoon; and
 - g. Remove the three remaining aerators;
4. By June 30, 1984 Georgia-Pacific shall:
 - a. Remove excess fill from "E₁", "B", and "C" and cover "D";
 - b. Seed and fertilize all filled areas;
 - c. Dredge and pump sludge from lagoon 2 into "E₃";
 - d. Drain water from lagoon 2 through the existing outfall to the proximity of any residual sludge.

BOD compliance shall be maintained through COD testing of effluent as it relates to BOD.

- e. Remove last aerator and diversion curtain;
 - f. Cut dikes on lagoon 2 - Dewater sludge using sump pumps; and
 - g. Remove any remaining sludge from bottom of lagoon 2 and deposit in "E₃";
5. By December 31, 1984 Georgia-Pacific shall:
- a. Dewater "E₃" using drain pits in the dikes. The supernatant is to be pumped over an established grassed area;
 - b. Cover "E₃" using dikes from lagoon 2;
 - c. Recontour entire area; and
 - d. Seed and fertilize the remaining area;
6. Georgia-Pacific shall immediately submit to the Agency, if it has not already done so, any permit applications needed to authorize any actions contained in this variance including, but not limited to, the relocation or removal of aerators and the construction of a temporary distribution system for flows from the dewatering system;
7. Georgia-Pacific shall establish a correlation between the discharge of chemical oxygen demand and five day biochemical oxygen demand such that discharges of BOD₅ from lagoon 2 are maintained within the effluent limitations incorporated in PCB 76-241; and
8. Within 45 days of the date of this Order, the Georgia-Pacific Corporation shall execute a Certificate of Acceptance and Agreement which shall be sent to: Illinois Environmental Protection Agency, Division of Water Pollution Control, Compliance Assurance Section, 2200 Churchill Road, Springfield, Illinois 62706. This certification shall have the following form:

CERTIFICATION

I, (We), _____, having read the Order of the Illinois Pollution Control Board in PCB 83-179, dated April 5, 1984, understand and accept said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

By: Authorized Agent

Title

Date

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 5th day of April, 1984 by a vote of 6-0.

Christan L. Moffett
Christan L. Moffett, Clerk
Illinois Pollution Control Board