



Georgia-Pacific LLC  
Consumer Products

Crossett Paper Operations  
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Crossett, AR 71635  
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(870) 364-9076 fax  
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April 23, 2014

Mr. Craig Uyeda  
NPDES Enforcement Section  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Reference: Georgia-Pacific LLC: Crossett Paper Operations  
NPDES Permit # **AR0001210**

Dear Mr. Uyeda:

Attached are the Discharge Monitoring Reports (DMRs) for the Georgia-Pacific Crossett Paper Operations' - NPDES Permit # **AR0001210** - for March 2014. Due to a handling error chlorinated phenolic samples collected during this monitoring period were analyzed outside of the specified holding time. As required by Part II, Section 5, paragraph d, of our NPDES Permit, a Toxicity Reduction Evaluation (TRE) Activities Report has also been included to cover TRE activities conducted this quarter.

If you have any questions or need additional information, please feel free to contact me at (870) 567-8144 or by email at [james.cutbirth@gapac.com](mailto:james.cutbirth@gapac.com).

Sincerely,

A handwritten signature in cursive script that reads 'James W. Cutbirth'.

James W. Cutbirth  
Environmental Manager

TRE Activities Report  
For Third Quarter of 2014

A Toxicity Reduction Evaluation (TRE) Action Plan was submitted on July 12, 2011 after sub-lethal effects were demonstrated in three consecutive Whole Effluent Toxicity (WET) tests for *Ceriodaphnia dubia*, as required by Part II, Condition 15, Paragraph 5 of NPDES permit number AR0001210. As per the plan the mill has begun conducting monthly WET testing for *Ceriodaphnia dubia* in an attempt to capture episodes of sub-lethal toxicity.

Samples collected during January and March of this quarter did demonstrate sub-lethal effects. Toxicity was significantly reduced by Ferric Chloride treatment during the test conducted the week of March 11, 2014. Filtering alone did not seem to affect effluent toxicity. All tests were conducted at the 80 percent effluent test concentration using Ouachita River water as diluent. The results of these TIE manipulations are outlined in Table 1 below. We are continuing investigations and testing to determine if we can identify the source(s) of the observed effects.

**TABLE 1.**  
**Percent Effect to *C. dubia* Reproduction for Untreated and Treated Effluent**  
**Georgia Pacific, Crossett Arkansas – January and March 2014**

Water/Test Date	Average Neonates per Female	Percent Inhibition
River Water 1/7/14	29.8	NA
80% 001 Effluent	24.4	18.1 <sup>1</sup>
80% Filtered 001 Effluent	22.9	23.1 <sup>1</sup>
100% Filtered 001 Effluent	19.4	34.8 <sup>1</sup>
River Water 3/11/14	24.1	NA
80% 001 Effluent	13.6	43.6 <sup>1</sup>
80% Filtered 001	15.6	35.3 <sup>1</sup>
100% Ferric/Floc treated 001	13.1	45.6 <sup>1</sup>
River Water 3/12/14	29.7	NA
80% Ferric/Floc treated 001	25.4	14.5
100% Ferric/Floc treated 001	23.5	20.9

<sup>1</sup> Impaired compared to river water control.

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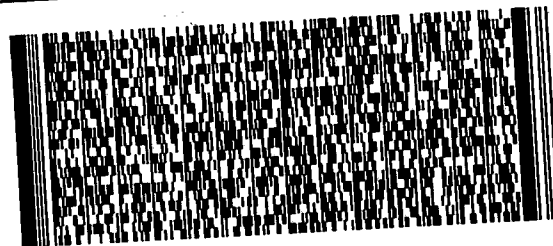
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