

Georgia-Pacific LLC Consumer Products

Crossett Paper Operations 100 Mill Supply Rd. P.O. Box 3333 Crossett, AR 71635 (870) 567-8000 (870) 364-9076 fax www.qp.com

October 20, 2011

Ms. Cindy Garner
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 Ms. Garner:

Attached are the Discharge Monitoring Reports (DMRs) for the Georgia-Pacific Crossett Paper Operations' - NPDES Permit # **AR0001210** - for September 2011. 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.

Sincerely,

James W. Cutbirth

Environmental Services Superintendent

cc: Mary Barnett, ADEO

## TRE Activities Report For Third Quarter of 2011

A Toxicity Reduction Evaluation (TRE) Action Plan was submitted on July 12, 2011 after sublethal 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 required by the plan, the mill has conducted monthly WET testing for *Ceriodaphnia dubia* since July 11. Since that time, there have been no effects on sub-lethal toxicity in any of the WET tests performed. Therefore, no additional Toxicity Identification Evaluation (TIE) manipulations were conducted.

Specifically, the progress on the requirements per by Part II, Condition 15, Paragraph 5.d of the permit is as follows:

- d.1 There is no new data identifying the pollutants and/or sources of effluent toxicity since there have been no further sub-lethal toxicity events.
- d.2 There have been no studies or evaluations that could be done to evaluate effluent toxicity since there have been no further sub-lethal toxicity events.
- d.3 Since there have been no further sub-lethal toxicity events, there is no new data that identifies effluent toxicity control mechanisms.