

Georgia-Pacific Corporation Consumer Products

100 Mill Supply Road P. O. Box 3333 Crossett, AR 71635 (870) 567-8000 (870) 364-9076 fax *www.gp.com* 

26 Sep 06

Mo Shafii ADEQ Water Division NPDES Permits Section Chief PO Box 8913 Little Rock, AR 72219-8913

RE: NPDES permit AR0001210 Request to reduce monitoring frequency for 2,3,7,8 TCDD fish tissue analysis

Dear Mr. Shafii:

The current NPDES permit requires annual monitoring to assess the levels of 2,3,7,8 TCDD in ambient fish tissue in the receiving stream (Ouachita River). Part III, Section 10 D also states that if two consecutive years of testing yield average results for each year less than 5.33 parts per trillion (ppt) of 2,3,7,8 TCDD for the outfall station, the frequency of monitoring may be reduced to once every three years or until a new permit is reissued. We have completed the first two years of testing with the current permit, and the average results for both years at the outfall station were well below the 5.33 ppt permit limit. The average for 2004 was 0.75 ppt, and the average for 2005 was 0.57 ppt.

Since the stipulations of the current NPDES permit have been met, we are requesting a reduction in monitoring frequency for 2,3,7,8 TCDD in fish tissue. We have attached 2004 and 2005 fish tissue analysis report for both the upstream and outfall sampling locations. Laboratory analysis of the fish tissue for 2004 and 2005 were performed by Analytical Perspectives in Wilmington, NC and are included.

If you have any questions concerning this request, or would like additional information, please feel free to call me at (870) 567-8144.

Sincerely, ames W. Cutleth

James W. Cutbirth Environmental Services Superintendent

SEP 2 9 2006

OCT 1 2 2006