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27 Jul 06

AUG - 2 2006

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 data 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.

If you have any questions concerning this request, or would like additional information, please feel free to call me at (870) 567-8670.

Sincerely,

James W. Cutbirth  
Environmental Services Superintendent

Cc Traylor Champion  
Mayes Starke

## Ouachita River Dioxin Study

Study Year: 2004  
 Permit Number: 122920041  
 Collectors: Alan Thomas / L Senn

Species	Weight Pounds	Length Inches	Sex	Sample Location	Study Number	Date
Flathead Catfish	4.8	24.75	F	Above Felsenthal	AR030-124-FSFHCA1	23
Flathead Catfish	4.5	23.5	F	Above Felsenthal	AR030-124-FSFHCA2	23
Flathead Catfish	6.5	25.75	F	Above Felsenthal	AR030-124-FSFHCA3	23
Blue Catfish	4.75	24	M	Above Felsenthal	AR030-124-FSBCA4	23
Blue Catfish	2.75	19.5	F	Above Felsenthal	AR030-124-FSBCA5	30
Blue Catfish	3.75	20.5	F	Above Felsenthal	AR030-124-FSBCA6	30
Blue Catfish	3.0	19.5	M	Below Coffee Creek	AR030-124-FSBCB1	30
Blue Catfish	6.25	26.25	F	Below Coffee Creek	AR030-124-FSBCB2	30
Blue Catfish	6.75	26.75	M	Below Coffee Creek	AR030-124-FSBCB3	30
White Bass	2.5	16.75	F	Below Coffee Creek	AR030-124-FSWBB4	30
Crappie	1.1	12.75	M	Below Coffee Creek	AR030-124-FSCRAB5	31
Crappie	0.75	10.5	F	Below Coffee Creek	AR030-124-FSCRAB5	31
Crappie	0.5	9.5	M	Below Coffee Creek	AR030-124-FSCRAB5	31
Crappie	0.4	8.0	F	Below Coffee Creek	AR030-124-FSCRAB5	31

Legend: 124: December 2004  
 FS: Fish  
 CRA: Crappie  
 FHC: Flathead Catfish  
 BC: Blue Catfish  
 SMB: Smallmouth Buffalo  
 LMB: Largemouth Buffalo  
 B: Below Coffee Creek  
 A: Above Lock & Dam  
 1-5: Indicates sample number

## Ouachita River Dioxin Study

Study Year: 2004  
 Permit Number: 122920041  
 Collectors: Alan Thomas / L Senn

Study Number	Weight Pounds	Length Inches	Sex	Type Sample	2,3,7,8 TCDD ppt	2,3,7,8 TCDF ppt
AR030-124-FSFHCA1	4.8	24.75	F	Fillet	0.90	0.05
AR030-124-FSFHCA2	4.5	23.5	F	Fillet	0.79	ND
AR030-124-FSFHCA3	6.5	25.75	F	Fillet	1.49	0.10
AR030-124-FSBCA4	4.75	24	M	Fillet	0.49	0.10
AR030-124-FSBCA5	2.75	19.5	F	Fillet	0.20	ND
AR030-124-FSBCA6	3.75	20.5	F	Fillet	0.60	0.07
AR030-124-FSBCB1	3.0	19.5	M	Fillet	0.76	0.17
AR030-124-FSBCB2	6.25	26.25	F	Fillet	0.70	0.13
AR030-124-FSBCB3	6.75	26.75	M	Fillet	0.86	0.33
AR030-124-FSWBB4	2.5	16.75	F	Fillet	0.67	1.0
AR030-124-FSCRAB5	2.75	*	M,M,F,F	Composite	0.18	0.19

**Comments:**

- ND = Non detect
- All samples are left side fillets.
- Lengths of composite samples are not totaled (\*).
- Weights are total of fish caught, not sample sent.

## Ouachita River Dioxin Study

Study Year: 2005  
Permit Number: 122920041  
Collectors: A. Thomas/L. Senn

Species	Weight Pounds	Length Inches	Sex	Sample Location	Study Number	Date
Smallmouth Buffalo	8.0	24.5	M	Above Felsenthal	AR030-125-FSSMBA1	5
Flathead Catfish	2.75	19.5	M	Above Felsenthal	AR030-125-FSFHCA2	5
Crappie	0.8	12	F	Above Felsenthal	AR030-125-FSCRAA3	17
Crappie	1.0	12	F	Above Felsenthal	AR030-125-FSCRAA4	17
Blue Catfish	5.5	25	M	Above Felsenthal	AR030-125-FSBCA5	22
Smallmouth Buffalo	9.1	24	M	Above Felsenthal	AR030-125-FSSMBA6	22
Largemouth Buffalo	12.3	27	F	Below Coffee Creek	AR030-125-FSLMBB1	5
Smallmouth Buffalo	6.8	23.25	F	Below Coffee Creek	AR030-125-FSSMBA2	5
Blue Catfish	5.2	25	M	Below Coffee Creek	AR030-125-FSBCB3	5
Blue Catfish	3.8	21.75	M	Below Coffee Creek	AR030-125-FSBCB3	5
Flathead Catfish	7.7	27.5	M	Below Coffee Creek	AR030-125-FSFHCB4	5
Flathead Catfish	5.5	25.5	M	Below Coffee Creek	AR030-123-FSFHCB5	5
Flathead Catfish	3.75	22.75	F	Below Coffee Creek	AR030-125-FSFHCB6	5

Legend:

- 125: December 2005
- FS: Fish
- CRA: Crappie
- FHC: Flathead Catfish
- BC: Blue Catfish
- SMB: Smallmouth Buffalo
- LMB: Largemouth Buffalo
- B: Below Coffee Creek
- A: Above Lock & Dam
- 1-6: Indicates sample number

## Ouachita River Dioxin Study

Study Year: 2005  
 Permit Number: 108209182003120017  
 Collectors: A Thomas/L Senn

Study Number	Weight Pounds	Length Inches	Sex	Type Sample	2,3,7,8 TCDD ppt	2,3,7,8 TCDF ppt
AR030-125-FSSMBA1	8.0	24.5	M	Fillet	0.28	0.90
AR030-125-FSFHCA2	2.75	19.5	M	Fillet	0.75	ND
AR030-125-FSCRAA3	0.8	12	F	Fillet	0.20	0.25
AR030-125-FSCRAA4	1.0	12	F	Fillet	0.13	0.18
AR030-125-FSBCA5	5.5	25	M	Fillet	0.76	ND
AR030-125-FSSMBA6	9.1	24	M	Fillet	0.54	1.8
AR030-125-FSLMBB1	12.3	27	F	Fillet	0.80	2.25
AR030-125-FSSMBB2	6.8	23.25	F	Fillet	0.50	2.15
AR030-125-FSBCB3	9.0	*	M,M	Composite	0.65	0.14
AR030-125-FSFHCB4	7.7	27.5	M	Fillet	0.65	0.11
AR030-123-FSFHCB5	5.5	25.5	M	Fillet	0.37	ND
AR030-125-FSFHCB6	3.75	22.75	F	Fillet	0.45	ND

**Comments:**

- ND = Non detect
- All samples are left side fillets.
- Lengths of composite samples are not totaled (\*).
- Weights are total of fish caught, not sample sent.