|  |  |  |
| --- | --- | --- |
|   |  | *Georgia-Pacific Crossett LLC**Consumer Products* Crossett Paper Operations100 Mill Supply RoadP.O. Box 3333Crossett, AR 71635www.gp.com |

July 29, 2022

Mary Barnett

Ecologist Coordinator

Arkansas Energy and Environment

5901 Northshore Drive

North Little Rock, AR 72118-5317

RE: Toxicity Reduction Evaluation Action Plan – Quarterly Report

NPDES Permit AR0001210; AFIN 02-00013

Dear Ms. Barnett:

Please find attached the Quarterly Report as required by the Toxicity Reduction Evaluation (TRE) Action Plan for Georgia-Pacific Crossett LLC, NPDES Permit AR0001210 submitted on March 31, 2022.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or need additional information, please contact Sarah Ross, our Environmental & Compliance Leader, at (870) 415-6363 or Sarah.Ross@gapac.com .

Sincerely,

Tommy D. Smith

Vice-President of Manufacturing

TRE Activities Report

For Second Quarter of 2022

A Toxicity Reduction Evaluation (TRE) Action Plan was submitted on March 31, 2022, after confirming persistent sub-lethal effects of 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 began conducting monthly WET testing for *Ceriodaphnia dubia* in an attempt to capture episodes of sub-lethal toxicity after persistent toxicity was confirmed in December of 2021.

There were no episodes of toxicity noted during the months of January through May 2022; however, samples collected during the week of June 13, 2022, demonstrated sub-lethal effects in excess of the permit limits. Retained samples from this week are presently being tested to determine if there is persistent toxicity at the 80% and 100% effluent concentrations, as outlined in the TRE Action Plan. As of July 29, 2022, these results are not yet available from the lab. We are continuing investigations and testing in accordance with the TRE Action Plan to determine if we can identify the source(s) of the observed effects. We will provide an update in the next quarterly TRE Activities Summary due October 31, 2022.

|  |  |
| --- | --- |
|  | NOEC Value |
|  | Fathead Minnow | *C. dubia* |
|  | Lethality | Sub-Lethality | Lethality  | Sub-Lethality |
| January 2022 | 80% | 80% | 80% | 80% |
| February 2022 | Not tested | Not tested | 80% | 80% |
| March 2022 (TIE initiated) | 80% | 80% | 80% | 80% |
| April 2022 | Not tested | Not tested | 80% | 80% |
| May 2022 | 80% | 80% | 80% | 80% |
| June 2022 | Not tested | Not tested | 80% | <25% |