



Georgia-Pacific Crossett LLC  
Consumer Products

Crossett Paper Operations  
100 Mill Supply Road  
P.O. Box 3333  
Crossett, AR 71635  
www.gp.com

July 27, 2023

Mary Barnett  
Ecologist Coordinator  
Arkansas Energy and Environment  
5901 Northshore Drive  
North Little Rock, AR 72118-5317

RE: Toxicity Reduction Evaluation Action Plan – Second Quarter 2023 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](mailto:Sarah.Ross@gapac.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Coduto'.

Deborah Coduto  
Vice-President of Manufacturing

TRE Activities Report  
For Second Quarter of 2023

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 September 2022 through April of 2023 nor in June of 2023. Only one set of samples, collected the week of May 8, 2023, demonstrated sub-lethal effects in excess of the permit limits since August of 2022. A summary of results has been included in the following table.

	NOEC Value			
	Fathead Minnow		<i>C. dubia</i>	
	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%
July 2022	80%	80%	80%	<25%
August 2022	Not tested	Not tested	80%	60%
September 2022	Not tested	Not tested	100%	100%
October 2022	80%	80%	80%	80%
November 2022	80%	80%	80%	80%
December 2022	Not tested	Not tested	80%	80%
January 2023	80%	80%	80%	80%
February 2023	Not tested	Not tested	80%	80%
March 2023	80%	80%	80%	80%
April 2023	Not tested	Not tested	80%	80%
May 2023	80%	80%	80%	<25%
June 2023	Not tested	Not tested	80%	80%

Additional chemical analysis was performed on samples collected in May and June of 2023 in an effort to characterize the effluent samples and understand the differences in the constituents of passing versus failing test samples. 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, 2023.