



Georgia-Pacific Crossett LLC
Consumer Products

Crossett Paper Operations
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www.gp.com

October 28, 2022

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

RE: Toxicity Reduction Evaluation Action Plan – Third Quarter 2022 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,

A handwritten signature in black ink, appearing to read 'Tommy D. Smith', written over a white background.

Tommy D. Smith
Vice-President of Manufacturing

TRE Activities Report
For Third 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, July 11, 2022 and August 8, 2022 demonstrated sub-lethal effects in excess of the permit limits. No effects were noted at the 80% or 100% concentrations for samples collected during the week of September 21; however, due to a misunderstanding with the lab the full dilutions series was not run for this set.

	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%

Additional chemical analysis was performed on each set of samples 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 January 31, 2023.