

US EPA ARCHIVE DOCUMENT

WEYERHAEUSER COMPANY
FLINT RIVER OPERATIONS

PROJECT XL

FINAL PROJECT AGREEMENT (FPA)

1998 ANNUAL PROGRESS REPORT

(JANUARY 98 - DECEMBER 98)

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I. OVERVIEW:

Note: The 1998 Annual FPA Tables One, Two and Three summarize the facility's actual environmental performance results versus the FPA superior environmental goals. The 1998 Annual Progress Report narrative provides detailed technical information describing the specific actions taken by the facility to achieve the superior environmental performance goals.

General Status

During 1998 Flint River has made good progress against the Minimum Impact Manufacturing (MIM) goals. One Phase IV MIM project remains to be completed which is to document an Environmental Management System (EMS) that conforms to the ISO 14001 standard. The mill has been involved with a team from its corporate offices to write a guidance document for achieving an ISO 14001 certification that will be used at other locations in the company. Specifically for Flint River, goals and objectives have been identified as well as the significant environmental aspects.

Progress has occurred in all of the Phase V MIM projects. The Timberlands Resource Strategies were completed in 1997. A feasibility study has been completed which identifies required equipment and estimated costs to reduce the Bleach Plant Effluent by 50%; information gained from this study and other pertinent information will be reviewed with EPA and GA EPD in connection with the reissuance of the mill's NPDES permit. Experiments continued to reduce Solid Waste by composting by-products that are sent to the landfill and using that material on test plots to fertilize the growth of new trees. In late 1998, the project of Water Use Reduction began by looking for ways to conserve water usage and whitewater loss in the Product Unit. A mill wide study has been underway in the second half of the year by a consultant to identify energy saving opportunities. And finally, the mill has completed HAPs emissions testing that will lead to a site-specific MACT rule during 1999.

The Flint River plant continued to be recognized for environmental excellence during 1998 by being the recipient of three environmental awards. The Community Action Network's "How Weyerhaeuser Protects the Environment" recognized the mill for its involvement in the Project XL Program and the AF&PA presented Weyerhaeuser with its 25th Annual Environmental Energy Achievement Award for pollution prevention. The American Business Press "W.D. Littleford" Award was given for outstanding environmental achievement. Pulp & Paper Magazine also featured Flint River in an article titled "EPA Regulatory Reinvention Program Offers Flexibility for Weyco Flint River".

Flint River is always eager to share our experience as a participant in the Project XL program to any interested parties. Several of these opportunities occurred this past year including a briefing to Weyerhaeuser's own Board of Directors.

Facility Compliance Status

Attention to basic water conservation practices by plant employees has maintained the plant usage to just under the MIM Phase IV goal for 1998 although the mill has not completed any projects directed at reducing water usage in the plant. Effluent BOD and TSS have continued a downward trend and are well below the Project XL permit limits. AOX has remained at a constant level and is also below the limit. Air results in Table 1 of this document have remained steady for 1998 with a notable reduction in Recovery Boiler opacity back to historical levels.

	1998 RESULT	PERMIT LIMIT	% OF LIMIT
BOD (lbs/ADMT)	2.13	3.8	56
TSS (lbs/ADMT)	2.80	4.09	68
AOX (kg/ADMT)	0.10	0.15	67
Water Usage (MMGD)	11.49	12.50	92

	1998 RESULT	% OF 1995 BASELINE
Color (lbs/ADMT)	87	66
COD (lbs/ADMT)	35.5	65
Criteria Air Pollutants (tons/Yr)	4025	89
Solid Waste Generation (lbs/ADMT)	461	74

There were no accidental reportable spills during the year, however, there was one incident that violated the permit for the plant's internal drinking water system. Residual chlorine level was allowed to drop below the minimum value on one occasion. There has been an increase in the number of reportable air permit incidents. Some of these incidents are attributed to uneven Calciner reliability that has shifted the Power Boiler towards becoming the primary incineration device for strong TRS gases. At the same time, steam conservation initiatives have driven the steaming rate of the Power Boiler down to a low point where maintaining the required furnace temperature and SO₂ control is difficult. Plant management has taken note of the increased number of incidents and has made this situation a priority in the plant Business Plan. While the number of air incidents increased, there were only three incidents where odorous gases were reported off the plant site. Leadership in the plant has taken action by initiating plans to inventory the operational status of the environmental monitors and control equipment and make improvements where needed. In addition, a set of problem statements have been developed that describe the incidents and will be worked with area process engineers, team coaches and operators to resolve and correct the root causes.

The reporting incidents are summarized below:

INCIDENT	#
Power Boiler SO ₂ Excess Emissions	19
Low Power Boiler Furnace Incineration Temperature	13
Power Boiler Scrubber Pressure Drop	1
Calciner TRS Excess Emissions	7

INCIDENT	#
Strong & Weak TRS Gas Venting	12
Bleach Plant ORP	6
Bleach Plant Scrubber Flow	1
Potable Water Residual Chlorine	1

II. ENVIRONMENTAL PERFORMANCE UPDATE:

One of the primary purposes of the FPA was to delineate the level of superior environmental performance that Flint River Operations would achieve under its MIM evolution strategy. These superior environmental performance targets were specified in Tables Two and Three of the FPA. The tables are updated in this report to reflect the facility's actual environmental performance through December '98. The current environmental performance continues to be equal to or better than the MIM Phase IV FPA performance goals with the exception of converting the existing Environmental Management System to a system that would conform to ISO 14001, as mentioned earlier. Raw water usage, effluent discharge BOD and TSS continue to trend down. However, during this reporting period process solid waste generation has increased slightly above 1997 actuals; but remains below FPA goals. The solid waste generation increase is due to uneven Calciner reliability causing higher lime mud solid waste generation.

III. MINIMUM IMPACT MANUFACTURING:

MIM Phase IV Implementation

MIM Phase IV covers the construction and operation of several process technology improvements (Isothermal Cooking - Brownside Optimization, Odor Control Upgrade, Energy Steam Reductions) and the conversion of Flint River Operation's environmental management system (EMS) to conform to ISO 14001. Focus areas of MIM Phase IV:

- * ISO 14001 EMS: The conversion of the existing EMS to conform to the ISO 14001 EMS has made progress through the company wide effort to build a Guidance Document. Flint River Operations and another Canadian mill have been working with Weyerhaeuser corporate resources to build a plan which lists requirements and gives examples for each requirement of the standard. Other Weyerhaeuser mills will use this Guidance Document as a template to build their environmental management system. Flint River has benefited from this project by being directly involved with the discussions to understand the standard and has completed several requirements such as identifying environmental objectives and targets and determining significant environmental aspects with regard to the pulp making process. Completion is forecast during 1999.
- * Raw Water Usage Reduction: The water reduction anticipated from the MIM Phase IV projects was not sufficient to offset increased mill water usage from other process areas. However, the total usage has returned to 11.49 MMGD average versus a FPA goal of 11.50 MMGD through daily water conservation focus of the production operators. Water use reductions will continue to be a focus area within the MIM Phase V feasibility studies.

MIM Phase V Implementation

During 1998, MIM Phase V Feasibility Studies were initiated or continued in the following areas: Solid Waste Reductions, Energy Conservation, HAPs Emission Reductions and Water Use Reduction. The Timberlands Resource Strategies were fully implemented in 1997.

- * Solid Waste Reductions: The solid waste performance for 1998 was 461 lbs/ADMT of production. This is an increase of approximately 14% over the 1997 performance of 405lbs/ADMT. This increase was caused primarily by over 9,200 tons of additional lime mud from two Calciner operating and mechanical incidents resulting in increased Calciner downtime. On the positive side, reductions were achieved as follows: about 400 tons in Waste Clarifier Sludge from enhanced performance of the finish fiber cleaners, some 400 tons in Power Boiler flyash, over 600 tons in Screening Room "Knots" from the Digester modifications, and about 150 tons of Woodyard debris.

Composting Feasibility Trial: Analytical results from the second composting trial are complete and show composting to be a viable alternative for landfilling certain process solid wastes. A final report is expected from the University of Georgia by February 1, 1999. An economic evaluation of composting will be performed after the final report is received. Further efforts on composting will be placed "on hold" pending growth results from the field application trials.

Land Application Feasibility Trials: The Weyerhaeuser study plan for application of compost and some process wastes on small test plots as forest and crop amendments is on schedule. Field plots, with compost and wastes incorporated into the soil, have been planted with seedlings. Measurements for survivability and growth will be conducted this summer. The long term study being conducted by the University of Georgia using process solid wastes for silvicultural and agricultural soil productivity remains on schedule. In addition, the Macon County Extension Agent, is investigating lime mud as a lime substitute and compost application on selected row crops.

- * Energy Conservation: Several small scale energy conservation projects were completed during the year and together will cause a reduction of steam demand. These projects were:

- Product Unit condensate return to the boiler feedwater system (7600 #/hr steam savings)
- Evaporator Condensate returned to the Reconst area (saving 5400 #/hr of steam to heat Mud Filter wash water and a mill water savings)
- Reduction of secondary temperature on the Recovery Boiler (will save 3900 #/hr steam demand on the Power Boiler)
- Using weak filtrate to clean the Cylinder Mould Face Wire (saving 19,000 #/hr of steam and a mill water savings)

A project to reduce Recovery Boiler Soot Blower steam has been placed on hold while economic issues are further explored.

A consultant was selected to perform a "Steam Conservation" study that identified several steam saving projects throughout the plant. The continuation of the study will determine which projects are economically feasible and provide a good return on energy savings. One or more of these projects will be selected during the next year(s) and will form the basis of the plant's energy conservation plan.

- * HAPs Emission Reductions: Since the finalization of the Cluster Rule, two meetings have taken place with the US EPA and Georgia EPD. These meetings were designed to begin the process of defining the site specific MACT I alternative compliance rule for Flint River Operations. The mill has completed HAPs emissions testing around the Steam Stripping system, the Bleach Plant, Screening, and the Oxygen Stage sources to quantify the amount of HAPS (as methanol) that is produced in these process areas. The results of this testing will be used in a meeting scheduled for February 4, 1999 to develop the MACT Compliance Plan to comply with the HAPs reductions required by the Cluster Rule. Once the MACT Compliance Plan is completed, a site specific rule will be developed.
- * Water Use Reduction: Several potential projects have been identified that can potentially lower the use of mill water in the plant. One of these has completed the feasibility stage. This project may ultimately return whitewater from the paper machine area that is presently sewerred and send it to the Bleach Plant to displace water that is used for washing in the D₁ bleach tower. Before any capital money is allocated, the first step will be to look at procedural changes and equipment repairs that can be made in the paper machine area that will reduce water usage. It is estimated that 200,000 to 300,000 gallons per day savings or more can be achieved in this manner. The data will then be evaluated to determine if enough excess whitewater volume remains to be sent to the Bleach Plant. Other potential water reduction projects scheduled for feasibility studies include; 1) sending bleaching stage E₀ filtrate to replenish water lost in the Woodyard log flume, 2) collecting bearing cooling water from the Recovery Boiler and Power Boiler ID and FD fans and sending it to the Power Boiler Scrubber, and 3) evaluating the use of waterless packing or mechanical seals on rotating equipment in various areas of the plant.
- * Bleach Plant Effluent Reductions: The initial feasibility study for this project has been completed. The study was done to determine the equipment required, effects on product quality and effluent, and estimated capital costs. Information gained from this study and other pertinent information will be reviewed with EPA and GA EPD in connection with the reissuance of the mill's NPDES permit. The company's initial assessment is that the project cost estimate now available exceeds the amount that would justify moving ahead with additional bleach plant effluent quantity reductions, given current pulp market conditions. Pulp purchasers in Europe have indicated very little interest in paying a higher price for pulp from a mill with a closed bleach plant. Pulp purchasers in North American have been even less interested. There still remains some additional testing for internal improvements in the Bleach Plant without the expenditure of major capital that may lead to a reduction of effluent.

IV. STAKEHOLDER INVOLVEMENT:

Weyerhaeuser Company openly communicates concerning the status of operation under the FPA, answering all questions and inquiries. On January 28, 1998 the first annual stakeholders meeting was held in Oglethorpe, Georgia. This meeting was open to the public and was advertised in area newspapers and courthouses. The

feedback obtained from the meeting was very supportive of both the Project XL Program and Weyerhaeuser Company's environmental performance.

U.S. EPA has maintained an updated Project XL Internet page, which contains a copy of the approved FPA document and other associated information. This 1998 Annual Progress Report will be available on U.S. EPA's Project XL Internet page at <http://www.epa.gov/ProjectXL>.

The following is a listing of meetings and conferences that Weyerhaeuser personnel have attended and participated in to share information regarding the FPA and Project XL during calendar year 1998:

Lockheed Martin Aeronautical System - Pollution Prevention & Environmental Department
Presented program on Weyerhaeuser's Project XL Experience & Minimum Impact Manufacturing.

CH2M Hill Consultant – Atlanta Regional Office
Presented program on Weyerhaeuser's Project XL Experience & Minimum Impact Manufacturing.

State of Georgia Office of Budget and Planning – Georgia Environmental Partnerships
Presented program on Weyerhaeuser's Project XL Experience & Minimum Impact Manufacturing for achieving Industrial Sustainability.

Weyerhaeuser Company – Board of Directors
Presented a summary of Minimum Impact Manufacturing, Project XL and its benefits to the Weyerhaeuser Board of Directors, which represent many various types of US corporations.

Washington State - Department of Ecology Conference on its Environmental Excellence Program
Presented program on Weyerhaeuser's Project XL Experience & Minimum Impact Manufacturing.

Good Business Conference – Beaverton, Oregon
Presented program on Weyerhaeuser's Project XL Experience & regulatory reinvention.

American Bar Association – Section on Natural resources and the Environment Annual Meeting
Presented program on Weyerhaeuser's Project XL Experience & regulatory reinvention.

V. FINAL PROJECT AGREEMENT IMPLEMENTATION:

Regulatory Actions

During 1998, the regulatory initiatives have been the development of the site specific rule for implementing the alternative compliance approach for the MACT I standard and the request for a minor modification to the solid waste handling permit. The modification to the solid waste permit was done to comply with the agreement in Section IX of the FPA. The modification to the water withdrawal permit is expected during the second half of 1999.

FPA Section IX: Implementation Schedule

Progress against the implementation timelines outlined in FPA Section IX. - Implementing Project XL for Flint River Operations, is as follows:

Mechanisms That Are Enforceable:

- WATER: Items 1, 2, 3, 4, 5 - Completed in NPDES permit.
- WATER USAGE: Item 1 – No action has taken place with project at this time. The study to identify water reduction possibilities remains on the plant's technology plan for 1999.
- SOLID WASTE: Item 1 – Permit modification request submitted in late 1998.
- AIR: Items 1, 2, 3, 4, 5, 6 - Completed in PSD air quality permit. Item 7 – In progress

Mechanisms That Are Not Enforceable:

- ISO 14001 EMS: Item 1 - Work in progress, to be completed by 6/99.
- WATER: Item 1 - Following timelines per the original FPA.
- SOLID WASTE: Item 1 - Completed. Item 2 - Feasibility studies in progress for composting and land application initiatives; following timelines per the original FPA for 50% reduction.
- HAZARDOUS WASTE: Item 1 - Completed.
- BLEACH PLANT: Item 1 - Following timelines per the original FPA for 50% reduction.
- ENERGY: Item 1 - In-depth feasibility study near completion. Item 2 - Following timelines per the original FPA.

VI. SCHEDULE:

Next Six Months

The key focus areas for continued successful implementation of the FPA over the next six months will be the following:

- Determine the cause for and correct the growth in air emissions that occurred in 1998.
- Complete the effort to convert Flint River Operation’s EMS into ISO 14001 EMS in 1999.
- Identify and implement water conservation measures to achieve MIM Phase IV goal of 11.5 MGD.
- When water conservation measures support the MIM Phase IV goal, modify the water withdrawal permit.
- Evaluate the “Steam Conservation ” study results to begin development of an Energy Conversation plan.
- Complete the development of the MACT I site-specific rule for the facility.
- Implement the applicable Cluster Rule requirements according to timelines within the regulation.
- Focus on continued reduction of Solid Waste in Wastewater Clarifier Sludge through optimizing the finish fiber cleaners, Screening Room "Knots" reinjection into the Digester, Calciner throughput and reliability, and recovery of Woodyard "sticks" from the Debarking Drum.
- Define possible water reuse and reduction opportunities that would reduce Bleach Plant effluent flow.

Long Term Schedule

At this time, the long term schedule for MIM Phase V feasibility studies and the implementation of the agreed-upon regulatory flexibility are nearly on track with the original schedule outlined in the FPA. In addition to the Project XL FPA initiatives, other regulatory requirements to be implemented include the following: Clean Air Act Risk Management Plan, Cluster Rule Liquor Best Management Practices, Compliance Assurance Monitoring requirements and state issuance of the facility’s Title V Air Permit. Additionally, we will continue our on-going dialogue with Stakeholders seeking their input on our facility’s long term MIM Vision, including the Lake Blackshear Watershed Association, Macon County Local Emergency Planning Committee, Georgia Southwestern State University, representatives of local and state governments, and local neighbors and facility employees.

Weyerhaeuser Project Contact Listing:

Please contact the below listed Weyerhaeuser individuals for more information regarding this FPA:

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GLOSSARY OF TERMS

ADMT	Air Dry Metric Ton - measure of the facility's finished product = 2,205 lbs
AOX	Adsorbable Organic Halide - measurement of the amount of chlorinated organic compounds.
BOD5	Biological Oxygen Demand - the amount of oxygen consumed in five days by biological processes breaking down organic matter.
COD	Chemical Oxygen Demand - the measure of oxygen required to oxidize all compounds in water, both organic and inorganic.
EMS	Environmental Management System
EPA	United States Environmental Protection Agency
EPD	Georgia Environmental Protection Division
FPA	Final Project Agreement
HAP	Hazardous Air Pollutant
ISO	International Standards Organization
NPDES	National Pollutant Discharge Elimination System
MIM	Minimum Impact Manufacturing - a holistic pollution prevention strategy to minimize the impact on the natural environment (air, soil, water).
MACT	Maximum Achievable Control Technology
ORP	Oxidation Reduction Potential
SO ₂	Sulfur Dioxide
TRS	Total Reduced Sulfur
TSS	Total Suspended Solids - a measurement of the amount of suspended solids in an effluent water sample.
XL	e <u>X</u> cellence and <u>L</u> eadership

1998 ANNUAL ACTUALS FPA - TABLE ONE

MINIMUM IMPACT MILL - KEY ENVIRONMENTAL DATA PARAMETERS

Parameters important to demonstrating continuous improvement towards a Minimum Impact Mill are:

ENVIRONMENTAL PARAMETER	1995 ACTUAL		1996 ACTUAL		1997 ACTUAL		1998 ACTUAL	
WATER								
Water Usage (MMGD)	11.43		11.91		11.74		11.49	
Bleach Plant Effluent Volume (m3/ADMT)	20		20		20		20	
Final Effluent Volume (gal/ADMT)	11,729		11,704		11,365		11,366	
BOD (lbs/ADMT)	4.15		3.52		3.01		2.13	
COD (lbs/ADMT)	54.3		53.8		36.5		35.5	
TSS (lbs/ADMT)	5.14		3.58		3.13		2.80	
AOX (kg/ADMT)	0.10		0.10		0.10		0.10	
Dioxin - 2,3,7,8 TCDD	non detect		non detect		non detect		non detect	
Color (lbs/ADMT)	132		115		94		87	
Nutrients: NH3-N & Total P (lbs/ADMT)	NH3-N 0.25	Tot P 0.15	NH3-N 0.14	Tot P 0.15	NH3-N 0.15	Tot P 0.13	NH3-N 0.20	Tot P 0.14
Chronic Toxicity – Ceriodaphnia (IC25 Annual Average)	40		55		81		47	
AIR								
Particulate (tons/year) (1)	457		423		385		390	

Total Reduce Sulfur (tons/year) (2)	43	39	35	33
Chloroform (tons/year) (3)	1.06	0.94	0.89	1.00
Chlorine (tons/year) (3)	0.19	0.18	0.18	0.19
Chlorine Dioxide (tons/year) (3)	0.70	0.67	0.68	0.70
CO (tons/year) (6)	1780	1676	1454	1573
NOx (tons/year) (4)	881	832	769	795
SO2 (tons/year) (4)	587	271	624	582
VOC's as C (tons/year) (5)	759	636	669	652
Opacity - Recovery Boiler (% Excess Opacity Emissions/year)	0.59%	0.65%	1.70%	0.70%
HAPs (tons/year) (5)	534	425	429	426
SOLID WASTE				
Solid Waste Generation (lbs/ADMT)	653	505	409	461
Solid Waste Disposition	on-site landfill	on-site landfill	on-site landfill	on-site landfill
Hazardous Waste Generation Status (7)	Small Quantity Generator (SQG)	SQG	Conditionally Exempt SQG	Conditionally Exempt SQG
OTHER				
Accidental Releases/Spills (#/year)	0	0	1 (Sulfuric Acid spill to ground)	0
Reportable Permit Incidents (#/year)				
- Air Permit Incidents (8)	25	25	27	59
- All Other Permits (NPDES, Landfill, Potable Water, Water Withdrawal)	0	0	0	1 (Potable Water)

Sara 313 (# Reportable Chemicals/year) (9)	12	10	11	11*
Energy Steam Usage (MlbsSteam/ADMT) (10)	21.18	22.44	20.94	20.56
Community Complaints				
* Site Appearance	None	None	None	None
* Odor (#/year)	1	2	3	3
* Noise (#/year)	0	0	0	0

- 1 Emissions calculated from Recovery boiler, Power boiler, Calciner, Smelt dissolving tank and fugitives.
- 2 Emissions calculated from Recovery boiler, Calciner, Smelt dissolving tank and process vents.
- 3 Emissions calculated from all process vents. Figures for 1995, 1996, and 1997 have been revised to indicate emissions from all process vents and to correct a conversion factor error. The data for these items are derived from SARA 313 estimates.
- 4 Emissions calculated from Recovery boiler, Power boiler, Calciner and Smelt dissolving tank.
- 5 Emissions calculated from Recovery boiler, Power boiler, Calciner, Smelt dissolving tank, process vents and fugitives.
- 6 Emissions calculated from Recovery boiler, Power boiler, Calciner, Smelt dissolving tank and process vents.
- 7 Small quantity generator status is < 2,200 lbs/month hazardous waste generation; Conditionally Exempt SQG < 220 lbs/month.
- 8 Number of air permit incidents reported in quarterly excess emissions reports for 1995, 1996, 1997. Includes air pollution control equipment malfunctions, excess emissions incidents, continuous emission monitor malfunctions, non condensable gas collection system venting incidents and surrogate parameters exceedances. No enforceable actions taken.
- 9 The SARA 313 chemicals reported for 1995: acetaldehyde, ammonia, catechol, chlorine, chlorine dioxide, cresols, formic acid, hydrochloric acid, methanol, nitrate, phenol, sulfuric acid. Reported 1996: acetaldehyde, ammonia, catechol, chlorine, chlorine dioxide, cresols, hydrochloric acid, methanol, phenol, sulfuric acid. Reported 1997: acetaldehyde, ammonia, catechol, chlorine, chlorine dioxide, cresols, methanol, phenol, sulfuric acid, nitrate, formic acid. *Note that the 1998 SARA reported chemicals will not be available until June 99; it is estimated that the number of reported chemicals will be the same as 1997. The facility's SARA 313 calculations are primarily based on industry emissions factors which are being revised annually.
- 10 Energy steam usage is the quantity of on-site steam generation from the Recovery and Power Boilers required to produce an air dry metric ton of finished fluff pulp.

1998 MIDYEAR ACTUALS FPA - TABLE TWO

FLINT RIVER BASELINE PERFORMANCE AND MIM IV GOALS TO BE INCLUDED IN ENFORCEABLE PERMITS

ENVIRONMENTAL PARAMETER ¹	BASELINE ²	1995 ACTUAL	1996 ACTUAL	1997 ACTUAL	1998 ACTUAL	FPA AGREEMENT MIM PHASE IV GOAL
Raw Water Usage (million gallons/day)	11.18	11.43	11.91	11.74	11.49	11.50
Effluent Discharged to Flint River						
BOD (lbs./ADMT)	4.32	4.15	3.52	3.01	2.13	3.80
TSS (lbs./ADMT)	4.65	5.14	3.58	3.13	2.80	4.09
AOX (kg./ADMT)	0.11	0.10	0.10	0.10	0.10	0.15

¹ Applicable regulatory requirements are unaffected for all regulated environmental parameters that are not listed in Table Two.

² Baseline conditions are derived from average monthly values for calendar 1993, 1994 and 1995.

1998 MIDYEAR ACTUALS FPA - TABLE THREE

FLINT RIVER BASELINE PERFORMANCE AND MIM GOALS THAT WILL *NOT* BE INCLUDED IN ENFORCEABLE PERMITS

ENVIRONMENTAL PARAMETER	BASELINE	1995 ACTUAL	1996 ACTUAL	1997 ACTUAL	1998 ACTUAL	FPA AGREEMENT MIM PHASE V GOAL
Solid Waste Generation (lbs/ADMT)	690	653	505	409	461	310
Hazardous Waste Generation	Small Qnty.Gen.	Small Qnty.Gen.	Small Qnty.Gen.	Conditionally Exempt SQG	Conditionally Exempt SQG	Conditionally Exempt SQG
Bleach Plant Flow (m ³ /ADMT)	20	20	20	20	20	10
Environmental Management System	Flint River EMS	Flint River EMS	Flint River EMS	Flint River EMS	Flint River EMS	ISO 14001
Energy Conservation					Feasibility Study in Progress	To Be Determined after Feasibility Study