

US EPA ARCHIVE DOCUMENT

April 8, 1999

Steve Groves, Manager, Environmental , Health and Safety
International Paper
Androscoggin Mill
P.O. Box 20
Jay, ME 04239

Dear Steve:

Thank you for meeting with us on April 5 and 6, 1999 to discuss the International Paper "BMP" Project XL proposal. As we discussed, the information we gained during the visit will be used for EPA to further assess the project, identify relevant regulations, and recommend revisions to the proposal. The site visit also allowed the review team see the Androscoggin Mill first hand and understand the issues surrounding the project. Please provide special thanks to Chuck Kraske, John Cronin, Kurt Treadwell, Phil Sekerak, and Ai Bievenue, they were extremely helpful, knowledgeable, and professional in their interactions with the review team.

We had discussed several items for International Paper to provide to the review team for their further review. We know that the Mill is extremely busy during the current plant shutdown but the sooner we are provided with the information, the sooner we can continue our review. The items IP should provide include:

- Please identify the sections of the BMP requirements identified in 40 CFR 430.03 (c) (1)-(10) that IP would like waived or modified (or the portions thereof). Also to the extent that IP has already performed estimates on the relative contribution of each of the BMP requirements, could IP provide this information to the review team?
- To the extent that IP already has this information, could IP describe the Mill's existing spill prevention, reporting, control EMS, advanced process control technologies, reuse of spent pulping liquor and other activities that may reduce the need for the BMPs identified in the Cluster Rule requirements. As an example of one approach EPA may consider, IP discussed records for the soap storage tank that shows a spill management plan may not be necessary for this tank because they track all spills at the mill and the soap storage tank has not had a spill in the three years spills have been tracked.
- What level of effluent discharge reductions (including flow) are anticipated with the spent liquor reduction projects listed on page 4? Could IP provide the anticipated decreases in effluent

concentrations (and flow rates) for each of the seven spent liquor reductions projects identified in the proposal (if it has been developed)?

- Could IP provide a reasonably current simplified process flow diagram of the pulping and bleaching processes at the Androscoggin Mill.
- We understand that IP has recently received some proposed limits from the ME DEP for BOD and TSS. Also IP is reconsidering some of their proposed XL limits presented in their December 30, 1998 proposal. Could IP review Table1 (attached) and make changes and corrections to the table to more accurately reflect potential permit conditions as well as IP thinking on their proposed limits. Note that we included a row for kappa numbers.

Again, thank you and the rest of the IP staff for meeting with us on Monday and Tuesday. Please call me at (617) 918-1834 if you have any questions regarding the items listed above.

Sincerely,

Chris Rascher,
Office of Assistance and Pollution Prevention

cc: Mark Dawson, Town of Jay
Ron Dyer, ME DEP
Review Team (via LAN)

Table 1

Pollutant	New Baseline Permit Limits NPDES & Cluster Rule	EPA Guess at New Baseline Performance Levels (f) NPDES & Cluster Rule	Proposed XL Permit Limits Stated by IP	EPA Guess at XL Proposed Performance Levels	High US Performance (annual)	EPA Guess at current Mill Performance Levels (e)
BOD	1.0		1.0	0.65	0.26	0.78 (g)
COD	N/A		30	26 (c)	15	29 (c)
AOX	0.5		0.26	<0.26	-	0.26 - 0.3 (a)
TSS	5.0/3.0		5.0/3.0	<5.0/3.0	-	5.5
Color	74 (b)		60	≤54	24	54 (d)
kappa						
TCDD	<10ppq	<10ppq	<10ppq	<10ppq	<10ppq	<10ppq

footnotes

- a. Information is based on lbs/day reported by mill for the last 12 months from State of Maine 1998 reports. Shows pattern of improvement.
- b. Number is based on expected new state standard.
- c. In order to determine best guess for *Current Mill Performance Levels* and *Proposed Performance Levels Under XL*, EPA needs to verify calculations, methodology used and time period. There appears to be a discrepancy with numbers independently acquired. What was IP's performance numbers/productive rate in 1998 for all critical values in units of kg/kgg?
- d. Information based on State of Maine 1998 reports.
- e. In order to better determine numbers for this entire column, team must know what BMPs the mill has currently in place.
- f. In order to better determine numbers for this entire column, team must know what BMPs will be instituted under the Cluster Rule that are not now in operation.
- g. Number taken from IP's proposal.