

US EPA ARCHIVE DOCUMENT

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 (e) |
| 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.