

US EPA ARCHIVE DOCUMENT

ATTACHMENT 1

<p align="center">BMP Requirements (Items c1 - c10 from regulations)</p>	<p align="center">BMP Equivalents</p>
<p>Return spent pulping liquor and soap to the process or discharge spilled or meter material at a rate that does not disrupt WWT</p>	<p>Return all leaks/spills of black liquor (BL) and soap to the process to the maximum extent possible. Systems have moats, sumps and diking to contain and return to the process. Also have an existing "BMP tank" for temporary storage of BL and soap.</p>
<p>Establish a program to identify and repair leaking equipment: Daily visual inspections Immediate repairs when possible Conditions to curtail or halt production for repair Track repairs</p>	<p>Daily visual inspections of systems are completed by operation and maintenance personnel. Repairs of leaks are completed on the next available outage. MIM system tracks repairs history of equipment.</p>
<p>Continuous automatic monitoring system to detect & control leaks/spills</p>	<p>All storage tanks have high level monitors and indicators. Some have alarms.</p>
<p>Annual training for operators, maintenance, technical and supervisors</p>	<p>The mill has annual training of Spill Prevention Control and Clean-up (SPCC) Plan which includes BL and soap.</p>
<p>Report of spills, intentional diversions not contained at the immediate process area</p>	<p>Under the SPCC Plan, all unplanned discharge of BL & soap incidents are reported to Environmental. The quantity reported is currently less than what is required under BMP.</p>
<p>Program to review any planned modifications to the pulping and chemical recovery facilities</p>	<p>All maintenance repairs and capital projects are first reviewed by respective area supervisors before the work is authorized. Big capital projects are also reviewed by an Environmental representative.</p>
<p>Annual tank integrity program coupled with other containment or diversion structures</p>	<p>Existing annual tank integrity program includes all BL/soap process and storage tanks.</p>
<p>Install and maintain secondary containment for turpentine storage tanks</p>	<p><i>Not applicable.</i> No turpentine process at Androscoggin.</p>
<p>Install and maintain curbing, diking to isolate soap from WWT</p>	<p>Half of the soap tanks currently have either moats, sumps or curbing.</p>
<p>WWT monitoring to detect leaks and spills</p>	<p>Area continuous sewer conductivity. Daily influent COD measurements. Effluent color and BOD measurements.</p>