

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

MEETING MINUTES

Attendees: Mike Steltenkamp, Harry Dail and John Taylor of International Paper in Cantonment; Jim Byer and Melissa Woehle of FDEP

Location: NWD Pensacola Office **Date:** June 22, 2006 **Time:** 10:30 A.M. – 12:30 P.M.

Subject: management of spent dip tank solution

Meeting Requested By: Florida Department of Environmental Protection (FDEP)

Meeting Objectives: To discuss management of dip tank solution when spent.

Notes:

DEP representatives (DEP) explained that the intent of this meeting was to ensure that the dip tank solution (DTS) was being managed in compliance with RCRA and that we would prefer to discuss and work out issues as they came up rather than discover them as violations during an inspection. DEP also expressed that the DTS was the only issue remaining in the open enforcement action with IP and that it could be resolved during the meeting.

IP representatives (IP) introduced a diagram of the pulp cooking liquor cycles and said that they would like to discuss reuse of the DTS and other options such as sending it to the Wastewater Treatment Plant (WTP) if reuse was not allowed. They said that they would prefer to continue the current practice, but would be willing to change if required. They also expressed interest in resolving the enforcement issues as soon as possible. The following were discussed: 1) The diagram, and the practice of discharging the spent DTS to the sewer, 2) reclamation of the spent DTS through the chemical recovery system, 3) use of the spent DTS as an effective substitute for a commercial product, 4) the wastewater treatment unit and elementary neutralization unit exemptions, 5) sending spent DTS offsite as a hazardous waste, and 6) changing the process so that a non-hazardous detergent is used in place of the caustic solution.

According to IP, the dip tank volume is < 1,000 lbs and it becomes spent and is discharged into the sewer two to three times per year. The point of entry into the sewer is equipped with a conductivity meter. Flow from this point normally goes to the WTP, but is diverted to a holding tank when the conductivity meter reads high as it would when the DTS is discharged. The DTS and recovered pulping chemicals are combined with filtrate from the decker seal tank and used as rinse water in the brown stock washers (BSW). The decker seal tank collects filtrate from stock washing after oxidation and before bleaching. Filtrate from the BSW is collected and thickened in evaporators and then sent to the recovery boiler where the organics are burned off to recover energy as steam and the in-organics are reclaimed in the form of smelt.

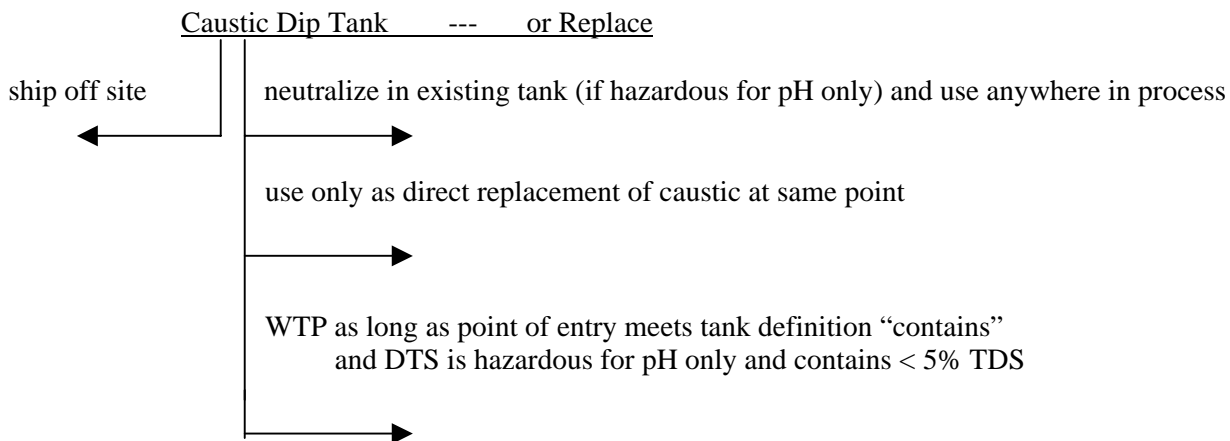
DEP explained that a recyclable material is regulated differently based on whether or not it is reclaimed before use and the type of reclamation involved. IP explained that there is value to using caustic in the BSW because it aids in breaking down the pulp and removing lignin. DEP asked if there is any need to add makeup caustic at the point that the DTS is being added. IP answered that the location was chosen out of convenience and that makeup chemicals are not normally added at that point. Makeup caustic is normally added to the process at the oxidation reactor and in the white liquor clarifier, and possibly other locations, but not directly at the BSW. DTS is not added at either the oxidation reactor or the white liquor clarifier because of impurities (i.e. oil and grease) that could cause QA issues with the finished product. Whether or not reclamation occurs before the spent DTS is used for its caustic

value was debated among the group. DEP explained that the DTS could be substituted for a commercial product if it were used as is without being reclaimed first.

IP explained the flow of filtrate from the oxidation reactor back to the BSW and asked if the filtrate would be considered hazardous waste. DEP explained that it was part of the process, so would not be hazardous waste when reused in the process.

IP asked about alternatives such as sending spent DTS to the WTP. DEP identified three possible options: ship off site as a hazardous waste, or take advantage of the Wastewater Treatment Unit (WTU) or Elementary Neutralization Unit (ENU) exemptions if all conditions could be satisfied. The three conditions that must be met to qualify for the WTU exemption and the two conditions that must be met to qualify for the ENU exemption were discussed. DEP advised that a WTU that leaked hazardous waste would be considered a surface impoundment and not an exempt unit.

IP drew a flow chart, reproduced below, to summarize their understanding of the options for management of spent DTS. All parties agreed that the chart was an accurate summary of the RCRA compliant options discussed.



IP said that they would rather not ship the DTS off-site as hazardous waste because they did not want to increase their generator status. They indicated that alternative cleaning chemicals such as detergent were being considered for environmental and safety reasons. They said that neutralization in the tank would not be likely because of safety concerns. They said that use as direct replacement would be their first choice if it could be accomplished, and sending to WTP if not.

DEP said that the waste should be profiled when spent. The meeting addressed the final remaining issue in the open enforcement action and a penalties only consent order will be issued to IP for signature. The meeting was adjourned.

Agreements/Conclusions Reached:

- IP Proposed to manage DTS in one of the following ways or replace with a non-hazardous cleaning solution:
 - Use as a direct replacement for caustic at the same point
 - Send to WTP as long as point of entry meets tank definition "contains" and DTS is hazardous for pH only and contains < 5% TDS.

- The DTS currently in use will be profiled for pH, RCRA metals and TDS when spent.
- DEP agreed that the proposal is compliant with RCRA and all issues in the open enforcement action have been addressed.
- DEP will issue a penalty only consent order to IP for signature.

Prepared by: ^{MW} Melissa Woehle

Date: 5-23-06

PULP COOKING LIQUOR CYCLES

