

Department of Environmental Protection

FILE COPY

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

JUNE 22, 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kyle Moore
Supervisor of Environmental and Analytical Services
International Paper Company – Pensacola Mill
Post Office Box 87
Cantonment, Florida 32533-0087

Subject: Site Rehabilitation Completion Order
International Paper Company – Pensacola Mill
375 Muscogee Road
Cantonment, Escambia County, Florida

Dear Mr. Moore:

This is in response to the December 2000 Black Liquor Pond Decommissioning Report prepared by Gulf Coast Environmental & Engineering, Inc. on behalf of International Paper Company Pensacola Mill located in Cantonment, Escambia County, Florida.

Upon review of the Black Liquor Pond Decommissioning Report, we find that the report satisfies the requirements of a Contamination Assessment Report (CAR) and a Site Rehabilitation Completion Report (SRCR) set forth in the Florida Department of Environmental Protection document "*Corrective Actions for Contamination Site Cases.*" Therefore, the CAR and SRCR are approved. Your consultant states that decommissioning of the black liquor pond has been completed in an environmentally sound manner and that soil quality has not been adversely affected by operations of the black liquor pond. Therefore, the consultant concludes that the site requires no further assessment of impacts to the environment from former operations of the black liquor pond. Based on the information submitted and the accountability of the professional geologist of record, we concur with this conclusion. The SRCR is hereby incorporated by reference in this Site Rehabilitation Completion Order (Order). Therefore, you are released from any further obligation to conduct site rehabilitation at the site associated with the decommissioning of the black liquor pond.

"More Protection, Less Process"

Printed on recycled paper.

The Department's Order shall become final unless a timely petition for an administrative proceeding (hearing) is filed under Sections 120.569 and 120.57, Florida Statutes (F.S.), within 21 days of receipt of this Order. The procedures for petitioning for a hearing are set forth below.

Persons affected by this Order have the following options:

If you choose to accept the above decision by the Department about the Site Rehabilitation Completion Report you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

If you disagree with the decision, you may do one of the following:

- (1) File a petition for administrative hearing with the Department's Office of General Counsel within 21 days of receipt of this Order; or
- (2) File a request for an extension of time to file a petition for hearing with the Department's Office of General Counsel within 21 days of receipt of this Order. Such a request should be made if you wish to meet with the Department in an attempt to informally resolve any disputes without first filing a petition for hearing.

Please be advised that mediation of this decision pursuant to Section 120.573, F.S., is not available.

How to Request an Extension of Time to File a Petition for Hearing

For good cause shown, pursuant to Rule 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from Mr. Kyle Moore, Supervisor of Environmental and Analytical Services, International Paper Company – Pensacola Mill, Post Office Box 87, Cantonment, Florida 32533-0087, shall mail a copy of the request to Mr. Kyle Moore, Supervisor of Environmental and Analytical Services, International Paper Company – Pensacola Mill, Post Office Box 87, Cantonment, Florida 32533-0087 at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be made.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative hearing under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000,

within 21 days of receipt of this Order. Petitioner, if different from Mr. Kyle Moore, Supervisor of Environmental and Analytical Services, International Paper Company – Pensacola Mill, Post Office Box 87, Cantonment, Florida 32533-0087, shall mail a copy of the request to Mr. Kyle Moore, Supervisor of Environmental and Analytical Services, International Paper Company – Pensacola Mill, Post Office Box 87, Cantonment, Florida 32533-0087 at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Section 120.54(5)(b)4.a., F.S. (1998, Supp.), and Rule 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the name, address, and telephone number of the petitioner's representative, if any, the site owner's name and address, if different from the petitioner, the FDEP facility number, and the name and address of the facility;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, or a statement that there are no disputed facts;
- (e) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or an order responding to supplemental information provided pursuant to meetings with the Department.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this Order is filed with the clerk of the Department (see below).

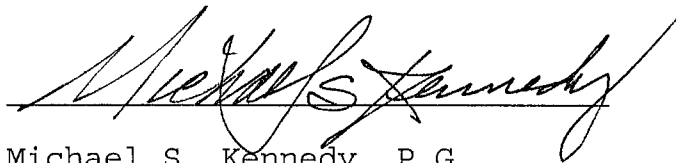
P.G. Certification

Site Rehabilitation Completion Order approval for International Paper Company - Pensacola Mill, 375 Muscogee Road, Cantonment, Escambia County, Florida; in response to the December 2000 Site Rehabilitation Completion Report for the decommissioning of the black liquor pond.

I hereby certify that in my professional judgement, the geological components in the December 2000 report satisfy the requirements set forth in the Florida Department of Environmental Protection document "Corrective Actions for Contamination Site Cases."

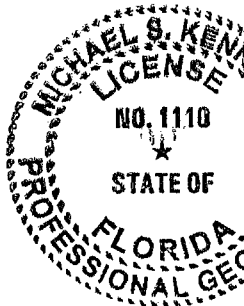
 I personally completed this review.

 X This review was conducted by Ms. Divina M. Ruiz, E.I. working under my direct supervision.



Michael S. Kennedy, P.G.
Professional Geologist No. 1110
Cleanup Section Supervisor
Northwest District

6/20/01
Date



7099 3220 0002 0951 9897

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
Article Sent To: <i>Ryle Moore</i>	
Postage \$	Postmark Here <i>6/22/01</i>
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (To be completed by mailer) <i>International Paper Co.</i>	
Street, Apt. No. or PO Box No. <i>PO Box 87</i>	
City, State, ZIP+4 <i>Cantonment FL 32533</i>	
PS Form 3800, July 1999 See Reverse for Instructions	

Memorandum

Florida Department of Environmental Protection

TO: W. Richard Fancher *rich*

THROUGH: Charles F. Goddard

Michael S. Kennedy, P.G. *msk*

FROM: Divina M. Ruiz, E.I. *dmr*

DATE: June 20, 2001

SUBJECT: International Paper Company- Pensacola Mill,
Site Rehabilitation Completion Order

On June 8, 1999, International Paper Company – Pensacola Mill notified the FDEP by letter of its intent to decommission the black liquor pond. Corrective actions had already been initiated on May 17, 1999.

On April 2, 2001, we received sufficient documentation indicating that corrective actions have been completed in accordance with the FDEP document, “*Corrective Actions for Contamination Site Cases.*” The black liquor pond appears to have been decommissioned in an environmentally sound manner and soil quality has not been adversely affected by operations of the black liquor pond. Further assessment of impacts to the environment does not appear warranted. Therefore, we recommend issuing a Site Rehabilitation Completion Order.

DMR:dmr

“More Protection, Less Process.”

Printed on recycled paper.

Florida Department of
Environmental Protection

Memorandum

TO: Michael S. Kennedy, P.G. *MSK*

FROM: Divina M. Ruiz, E.I. *DMR*

DATE: June 7, 2001

SUBJECT: International Paper Company Pensacola Mill, December 2000 Black Liquor Pond Decommissioning Report, Cantonment, Escambia County, Florida

I have reviewed the December 2000 Black Liquor Pond Decommissioning Report prepared by Gulf Coast Environmental & Engineering, Inc. on behalf of International Paper Company Pensacola Mill located in Cantonment, Escambia County, Florida. The report summarizes activities completed for decommissioning of the black liquor pond, which was no longer required for storage of black liquor due to process changes. The consultant concludes that the requirements for decommissioning have been completed and that the site requires no further assessment of impacts to the environment from former operations of the black liquor pond. Based on the information submitted and the accountability of the professional geologist of record, I concur with this conclusion and recommend issuing a Site Rehabilitation Completion Order.

The decommissioning process consisted of four phases: I) removal of the contents of the pond, II) removal and disposal of the top and bottom liners, III) assessment of potential impacts from the black liquor pond operation, and IV) development of a risk assessment closure plan, if required.

Phase I

Dredging operations to remove the black liquor liquids and/or solids were initiated in May 1999 and continued until May 2000. The black liquor solids were modified into a pumpable state to be processed back to the mill. Numerous events of pumping were conducted during this time.

Phase II

Washing down and removal of the top, bottom, and side liners and removal of the inter-liner sand continued from May to August 2000. The inter-liner sand mixed with black liquor was placed in the wastewater treatment system at the Pensacola Mill for further biological decomposition.

During Phase I activities, samples of the solids in the black liquor pond, a representative piece of the top liner, water rinsed over the liner, and the mill process water were collected and analyzed to assist in profiling the liner for future disposition at Perdido Landfill. Appendix C

includes the analytical results. Perdido Landfill was determined to be an acceptable disposal location for the liner material, which was manifested and transported to the landfill in August 2000. Appendix C also includes copies of the non-hazardous waste manifests.

Phase III

A sample of black liquor was collected from the black liquor process on June 3, 1999 and was analyzed by several EPA Methods. The results for the laboratory analysis assisted in developing the contaminants of concern (COCs) for the Phase III assessment activities. The COCs were selected based on the known composition of black liquor. Tables 1 through 12 include a full list of the COCs and the analytical results for each sample. The COCs generally consist of the following:

- Priority pollutant list of VOCs
- Priority pollutant list of SVOCs
- Priority pollutant list of metals
- General chemistry parameters pH, specific conductance, chlorides, sulfates, total cyanide, and total sulfide
- Black liquor parameters methyl sulfide, dimethyl sulfide, or methyl mercaptan

On August 15, 2000, eight composite soil samples were collected from the site at a depth of approximately three to four feet bls at the contact of the two-foot thick layer of Type II/III material consisting of clayey soils. (The liner was installed on top of this material.) Laboratory analysis for VOCs and semi-VOCs by EPA Methods 8260B and 8270C did not report detectable concentrations of these parameters. Analytical results also did not indicate the presence of black liquor parameters methyl sulfide, dimethyl sulfide, or methyl mercaptan. Laboratory analysis for metals indicated detection of antimony, arsenic, calcium, chromium, copper, iron, lead, manganese, potassium, selenium, silver, sodium, tin, vanadium, and zinc.

The concentrations of the reported detectable parameters were compared with the Industrial Direct Exposure target levels and Leachability Based on Groundwater Criteria target levels per Chapter 62-777, F.A.C. The detectable concentrations did not exceed the target levels for VOCs, semi-VOCs, or metals with the exception of arsenic.

Arsenic concentrations exceeded the Industrial Direct Exposure criteria of 3.7 mg/kg in five samples but were below the leachability criteria of 29 mg/kg. Arsenic is not a characteristic constituent of black liquor based on the laboratory results of the black liquor sample taken on June 3, 1999. The report states that arsenic is also a naturally occurring metal that could be associated with past use of herbicides in the vicinity of the nearby railroad. A meeting with FDEP on September 28, 2000, resulted in International Paper acknowledging the elevated levels of arsenic and developing procedures and guidelines to address worker protection that pertains to situations such as arsenic concentrations detected in the shallow subsurface underlying the black liquor pond. Appendix G includes a copy of the procedures.

International Paper
Page Three

The consultant states that decommissioning of the black liquor pond has been completed in an environmentally sound manner and that soil quality has not been adversely affected by operations of the black liquor pond. Therefore, the consultant concludes that the site requires no further assessment of impacts to the environment from former operations of the black liquor pond. I concur with the consultant's conclusion. Therefore, I recommend issuing a Site Rehabilitation Completion Order.