



June 8, 1999

Mr. Michael Kennedy  
Northwest District  
Florida Department of Environmental Protection  
160 Governmental Center  
Pensacola, Florida 32501

**Black Liquor Pond Decommissioning**

The Champion International Corporation, Pensacola Mill (Champion) hereby respectfully notifies the Florida Department of Environmental Protection (FDEP) of its intent to decommission the Black Liquor Pond at the Pensacola Mill. The black liquor storage pond is no longer required for storage of black liquor, and, therefore, the pond will be decommissioned.

Attached is a scope of work along with a description of the black liquor process. A simplified block flow diagram is also included.

Should you have any questions or wish to discuss this decommissioning plan further, please feel free to contact me at 968-2121 extension 2414.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Yonts', with a long horizontal flourish extending to the right.

Paul Yonts  
Principal Environmental Engineer  
Champion International Corporation

File: SO12B

JUN 11 1999  
NON-PROFIT ORGANIZATION  
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# **Champion International Corporation**

## **Black Liquor Pond Decommissioning Plan**

### **Scope of Work**

June 9, 1999

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The Decommissioning Plan consists of the following four phases:

- Phase 1: Removal of the contents of the pond and cleaning of the top liner.
- Phase 2: Removal and disposal of the top and bottom liners. The sandy material between the liners will be cleaned and reused.
- Phase 3: Assessment of Soil and Groundwater Quality.
- Phase 4: Development of closure plan for pond.

#### Phase 1

Champion has contracted with Gulf Coast Environmental & Engineering, Inc. (GCE&E) to oversee the decommissioning of the Black Liquor Pond. GCE&E will also assist with communications with the Department.

Champion has contracted with Resco, Inc. (Resco) to complete Phase 1 and part of Phase 2. The liquid and solids will be processed back to the evaporators and recovery boilers. Resco's dredge, the "Reconstitution System", is specifically designed to reconstitute solids in black liquor ponds. Once the dredge has reclaimed all that it can, conventional pumps will be used to remove the remaining material.

#### Phase 2

Phase 2 of the decommissioning will begin by removing the top liner, the Hypalon liner and the fabric. The liner and fabric shall then be cleaned, cut and bundled in accordance with Perdido Landfill requirements. The liner and fabric will then be transported to Perdido landfill for disposal.

The sandy material located between the liners will be reclaimed by washing and processing by mechanical means. A contractor to be determined shall provide pumps, hoses, and manpower for these activities. Collected wash water from this process will be sent to the wastewater treatment system.

The last step in Phase 2 will be to remove and dispose of the bottom liner. This will be done in the same manner as the top liner.

#### Phase 3

Soil and groundwater quality underlying the Black Liquor Pond will be evaluated during Phase 3. The results of this assessment will dictate the future direction of closure activities.

#### Phase 4

Based upon the contamination assessment, an appropriate closure plan and post-closure plan will be developed and submitted to the FDEP.

# Champion International Corporation

## Black Liquor Generation

June 9, 1999

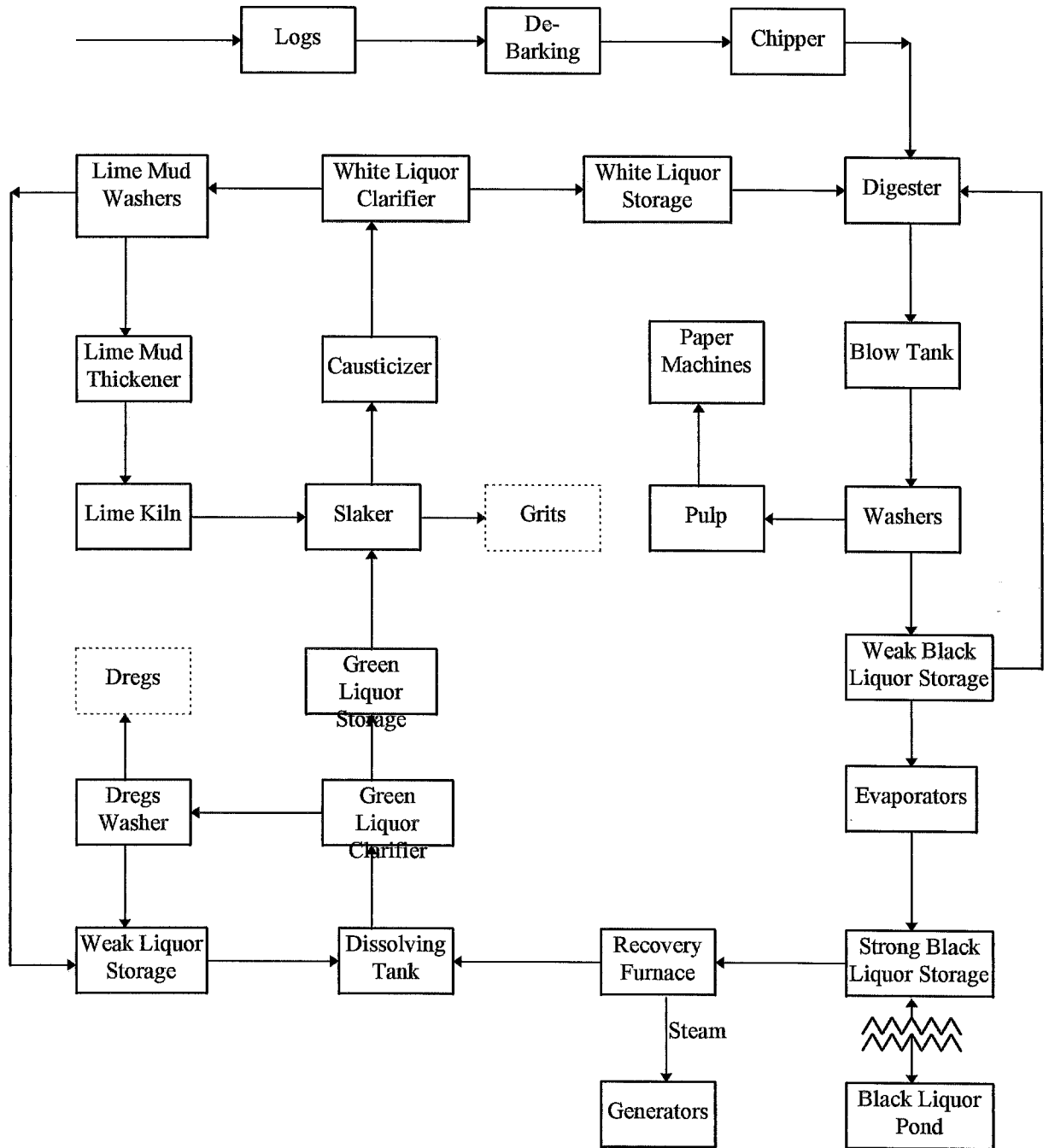
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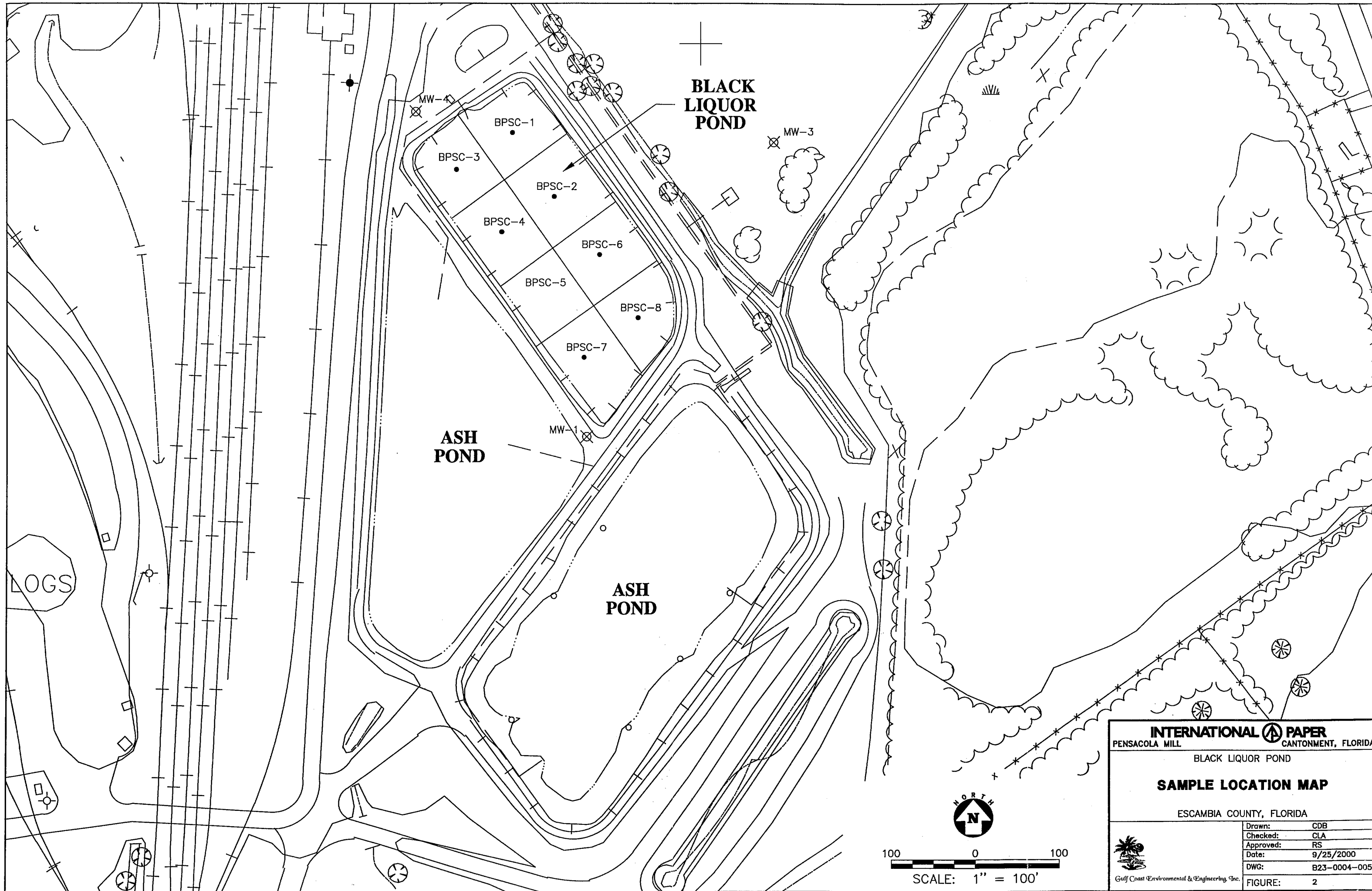
Champion generates pulp from pine wood and hardwood by use of the kraft (or sulfate) process (see attached process flow diagram). As a result of this process, black liquor is created which is an integral part of the pulping process. Debarked logs are cut into chips of equal size by chipping machines. Chemical pulping degrades the wood chips by dissolving the lignin bonds holding the cellulose fibers together. In the kraft pulping process, a caustic solution of sodium hydroxide and sodium sulfide (called "white liquor") performs this function in a digestion/cooking process with steam in a vessel called a digester. The material that results from the digester is a mixture of pulp and black liquor (alkali lignin, hydrolysis salts, and sulphonation products).

The resulting pulp material is blown to a blow tank and then to washers for separation from the black liquor. The pulp is then routed to high-density tanks prior to use on the paper machine. The black liquor is routed to multiple-effect evaporators for water removal, which is the beginning of the chemical recovery cycle. After water removal, the concentrated black liquor is burned in the recovery boilers, producing steam for generation of electricity and for mill steam needs. The primary reason the black liquor is burned is to allow recovery in the furnace of chemicals (such as sodium sulfide and sodium carbonate or "smelt") which is in turn treated with water and lime to produce fresh white liquor that can be used in the digester.

**Champion International Corporation  
Cantonment Mill  
Simplified Block Flow Diagram**

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<b>INTERNATIONAL PAPER</b> PENSACOLA MILL CANTONMENT, FLORIDA	
BLACK LIQUOR POND	
<b>SAMPLE LOCATION MAP</b>	
ESCAMBIA COUNTY, FLORIDA	
	Drawn: CDB Checked: CLA Approved: RS Date: 9/25/2000 DWG: B23-0004-005
FIGURE: 2	



Gulf Coast Environmental & Engineering, Inc.

600 S. Barracks Street, Suite 101 • Pensacola, FL 32501  
Office: (850) 433-8588 • Fax: (850) 433-5042

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RJF  
8/1/99  
7/1/99

July 1, 1999

Mr. Michael Kennedy, P.G.  
Florida Department of Environmental Protection  
Northwest District  
160 Governmental Center  
Pensacola, Florida 32501

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JUL 02 1999

NORTHWEST FLORIDA  
DEP

**Addendum  
Champion International Corporation  
Black Liquor Pond Decommissioning Plan  
Scope of Work**

On behalf of Champion International Corporation, Pensacola Mill, Gulf Coast Environmental & Engineering, Inc. (GCE&E) is submitting the following information as an addendum to the scope of work for the Black Liquor Pond Decommissioning Plan. We are submitting additional information for Phase 2 of the plan with regard to the recovered sandy material between the liners and the disposal of the collected rinse water from cleaning the sandy material. The original scope of work was forwarded to your office by cover letter dated June 8, 1999.

**Addendum to Phase 2**

The sandy material located between the liners will be reclaimed by washing and processing by mechanical means. Rinse water used in this washing process will be routed to the wastewater treatment system.

The reclaimed sandy material will be analyzed by an approved Florida CompQAP laboratory. As discussed with FDEP, the suggested parameters for evaluating the sandy material will include pH, specific conductance, chlorides, sodium, sulfates, sulfides, and mercaptans, and compared to applicable portions of F.A.C. 62-777, Contaminant Cleanup Target Levels (Unified Rule). It is anticipated that the reclaimed sandy material will be utilized as road base material on roads in-house on the Pensacola Mill property.

Mr. Michael Kennedy  
July 1, 1999  
Page 2

Should you have any questions regarding this Addendum, please feel free to contact me at 433-8588. We appreciate your assistance in this matter.

Sincerely,  
Gulf Coast Environmental & Engineering, Inc.

A handwritten signature in cursive script, appearing to read "Cynthia Arnold".

Cynthia Arnold  
Project Manager

cc: Mr. Paul Yonts, Champion  
Mr. Gene Eng, Champion

Pensacola Mill  
375 Muscogee Road  
P.O. Box 87  
Cantonment, Florida 32533-0087  
850 968-2121



June 2, 2000

Mr. Michael Kennedy  
Northwest District  
Florida Department of Environmental Protection  
160 Governmental Center  
Pensacola, Florida 32501

*msk*

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**JUN 07 2000**  
**NORTHWEST FLORIDA**  
**DEP**

**Black Liquor Pond Decommissioning**

The Champion International Corporation, Pensacola Mill (Champion) hereby submits a project status update to the Florida Department of Environmental Protection (FDEP) for the Black Liquor Pond Decommissioning project at the Pensacola Mill.

Attached is a status update and a scope of work for remaining phases of the project. Phase 2 revisions were discussed by telephone with Mike Kennedy of the DEP Solid Waste Department on June 1 and with Bill Evans of the DEP Wastewater Department on June 2. Both Mr. Kennedy and Mr. Evans acknowledged the change and gave verbal approval with no issues being raised.

Should you have any questions or wish to discuss this decommissioning plan further, please feel free to contact me at 968-4228.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Yonts', with a long horizontal flourish extending to the right.

Paul Yonts  
Principal Environmental Engineer  
Champion International Corporation

File: SO12B



**CHAMPION INTERNATIONAL CORPORATION**  
Cantonment, Florida

**BLACK LIQUOR POND DECOMMISSIONING PLAN**  
**STATUS UPDATE**  
May 16, 2000

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**Summary of current status of decommissioning project:**

**Phase I - Complete**

The maximum amount of the black liquor and solids in the pond have been reclaimed by dredging and pumped back to the mill for recovery. Currently, in the pond, we are down to the solids that the dredge could not reclaim and water. The remaining sludge materials have been analyzed and determined to be non-hazardous.

The top liner, having been previously profiled as non-hazardous, will be segregated from these materials during the removal process and disposed of in a non-hazardous municipal landfill. The actual disposal of the top liner will be accomplished in Phase 2.

**Phase 2 - Currently in Progress**

There is some black liquor and solids mixed with sand on the top of the primary liner. The sand layer between the primary and secondary liner has been mixed with black liquor. This material will be placed in the wastewater treatment system for further biological decomposition. This is a change in the scope of work as outlined in the original plan. In the original plan, manual washing to clean the sand was proposed. Based on the amount of black liquor mixed with the sand, this is not feasible. As in the original plan, all collected water from Phase 2 will be processed through the wastewater treatment plant.

The last step of Phase 2 will be to remove and dispose of the bottom liner. This will be done in the same manner as the top liner. The cleaned liner will be cut up into small sections and sent to the non-hazardous municipal landfill.

**Phase 3 - As Outline in the Original Scope of Work June 8, 1999**

Soil and groundwater quality underlying the Black Liquor Pond will be evaluated during Phase 3. The results of this assessment will dictate the future direction of closure activities.

**Phase 4 - As Outline in the Original Scope of Work June 8, 1999**

Based upon the contamination assessment, an appropriate closure plan and post-closure plan will be developed and submitted to the FDEP.

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**JUN 07 2000**

**NORTHWEST FLORIDA  
DEP**

**INTERNATIONAL  PAPER**

March 21, 2001

PENSACOLA MILL  
375 MUSCOGEE ROAD  
PO BOX 87  
CANTONMENT FL 32533-0087  
PHONE 850 968 2121

Mr. Michael Kennedy, P.G.  
Florida Department of Environmental Protection  
Northwest District  
160 Governmental Center  
Pensacola, Florida 32501

**Re: Black Liquor Pond Decommissioning Report**

Dear Mr. Kennedy:

International Paper Pensacola Mill (formerly Champion International Corporation) hereby submits the final report for decommissioning of the black liquor pond at the Pensacola Mill. The assessment activities conducted during Phase III of the decommissioning activities indicated that soil quality has not been adversely affected by the operation of the black liquor pond in comparison to applicable Industrial Direct Exposure target levels and Leachability Based on Groundwater Criteria target levels for soils per Chapter 62-777, F.A.C., for VOCs, SVOCs, metals, or TICs with the exception of arsenic.

As documented in the Decommissioning Report, arsenic concentrations in five samples exceeded the Industrial Direct Exposure target levels but were below the Leachability Based on Groundwater Criteria target level. Laboratory results of the black liquor sample collected at the mill as part of this project indicated that arsenic is not a characteristic constituent of black liquor.

International Paper acknowledges the presence of arsenic in the shallow subsurface underlying the decommissioned black liquor pond. International Paper is aware of the need to protect workers from arsenic exposure. As part of the Health and Safety Program at the mill, employees are made aware of the exposure potential under the written Personal Protective Equipment and Certification of Hazard Assessment Program.

Should you have any questions or wish to discuss this decommissioning plan further, please call me at 968-4228.

Sincerely,



Kyle Moore  
Supervisor of Environmental and Analytical Services

File: SN12B-2001

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**APR 02 2001**

**NORTHWEST FLORIDA  
DEP**