



PENSACOLA MILL
375 MUSCOGEE ROAD
PO BOX 87
CANTONMENT, FL 32533-0087
PHONE: 850.968.2121

December 20, 2018

U.S. Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

RECEIVED

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NORTHWEST FLORIDA
DEP

RE: National Response Center Release Report #1231971 Update
Sulfuric Acid Release - International Paper, Pensacola Mill

Mr. Juan,

International Paper's mill located at 375 Muscogee Road, Cantonment, FL 32533 (the Mill) provides updated release information related to the National Response Center release report (NRC Report #1231971) made on December 4, 2018, following a sulfuric acid spill occurring at the Mill. Additionally, this information serves to update the reports made to the Florida State Emergency Response Commission (SERC) and Local Emergency Response Planning Council (LEPC), also made on December 4, 2018.

The spill was entirely contained on the Mill's property with no off-site release or impact to water bodies. There were no injuries associated with this event. Following analysis of the event and spill material, the reportable quantity threshold of 1,000 lbs for sulfuric acid was not exceeded. This letter will outline the timeline of events, cause of release and release calculations associated with the above referenced sulfuric acid spill.

On December 4, 2018 at 8:13 am central time (CT), sulfuric acid was discovered to be released to earthen surface while pumping sulfuric acid material into a temporary storage tank. While pumping the sulfuric acid into the temporary storage tank, the tank was overfilled allowing acid to enter the temporary storage tank containment berm. The containment berm partially failed, allowing one hundred gallons of sulfuric acid to spill to earthen surface. The spill was immediately contained and re-pumped into a tote bin container. The earthen surface effected by the spill was neutralized.

Based on spill volume and tested concentrations, the spill is estimated to have been between 867 and 901 lbs of sulfuric acid, which is below the reportable quantity (RQ) spill threshold of 1,000 lbs. The calculations that support this estimate are show below:

Sulfuric Acid Spill 12/04/2018 Mass Calculation

The acid wt% was measured in different locations through the containment resulting in a range of concentrations. The concentration of acid in the area being pumped at time of spill (most likely case scenario) was 6 wt%. The highest concentration of acid found in the containment (worst case scenario) was 12 wt%.

These two different concentrations were used to calculate a range of the total mass of acid spilled based on a total volume of 100 gallons.

- **Most Likely Scenario – 6% Sulfuric Acid:**

Density of 6% H₂SO₄ = 1.0385 g/cm³

$$\frac{1.0385 \text{ g}}{1 \text{ cm}^3} * \frac{1 \text{ lb}}{453.59 \text{ g}} * \frac{3785.41 \text{ cm}^3}{1 \text{ gal}} * 100 \text{ gal} = 867 \text{ lbs}$$

- **Worst Case Scenario – 12% Sulfuric Acid:**

Density of 12% H₂SO₄ = 1.0802 g/cm³

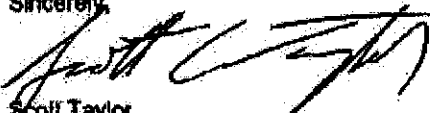
$$\frac{1.0802 \text{ g}}{1 \text{ cm}^3} * \frac{1 \text{ lb}}{453.59 \text{ g}} * \frac{3785.41 \text{ cm}^3}{1 \text{ gal}} * 100 \text{ gal} = 901 \text{ lbs}$$

The National Response Center (NRC) was notified of the spill at 8:22 am CT. The NRC call was followed by calls to Florida SERC at 8:42 am CT and Escambia County LEPC at 9:15 am CT. A brief description of the event was also submitted to the Florida online public notice of pollution website. No further reports have been compiled for this incident and there are no photographs.

Please call Laurie McLain at 850-968-4287 if you have any questions or comments.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,



Scott Taylor
Mill Manager
International Paper Company
Pensacola Mill

CC:

Mr. Christopher Stevens
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Mr. Garrett Griffin
Local Emergency Planning Committee
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