INTERNATIONAL PAPER

Ticonderoga Mill
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CERTIFIED MAIL

August 17, 2005

Mr. Michael A. McMurray
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 5 Headquarters
Route 86
P.O. Box 296
Ray Brook, New York 12977-0296

Re: Proposed Tire Derived Fuel Trial – Wastewater Impacts

Dear Mr. McMurray:

The purpose of this letter is to respond to the wastewater related comments in your March 10, 2005 letter pertaining to the proposed Tire Derived Fuel (TDF) Trial at International Paper's Ticonderoga Mill. This is also a follow-up to our series of telephone conversations with Mr. Vincent Kavanagh of the Department's Ray Brook Office on this subject.

The wastewater discharge from the Power Boiler scrubber will be treated in the Ticonderoga Mill's waste water treatment facility. This facility is recognized as one of the most effective treatment facilities in the pulp and paper industry. Based on mass balance calculations, the scrubber is expected to collect approximately 50% of the zinc that will be removed by the Power Boiler's pollution control equipment during the TDF trial. The zinc, along with other heavy metals present as particulates in the wastewater, will be absorbed into the wastewater treatment system biosolids. Soluble zinc present in the scrubber wastewater discharge, will precipitate out as zinc hydroxide solids in the wastewater treatment system since the pH of the secondary treatment part of the system is normally maintained in the alkaline range of 7-8. The zinc hydroxide solids will also be absorbed into the biosolids. Due to the relatively long residence time of wastewater and biosolids in the wastewater treatment facility, it could take several days to see any measurable changes in the concentrations of heavy metals in the biosolids.

The biosolids are gradually removed from the treatment process as secondary wastewater treatment sludge. The sludge is then disposed in the mill's permitted landfill. The landfill is equipped with a double liner system and all landfill leachate is also treated in the Ticonderoga Mill's waste water treatment facility.

The impact of the TDF trial on the mill's Outfall 001 wastewater discharge will be monitored by conducting the following testing:

- Daily zinc testing during the two week trial period. This testing will be conducted with a one day turnaround for the analytical lab results.
- One scan for all priority pollutants during the period when TDF is being burned at the maximum 3 ton/hour rate. This scan includes testing for all the priority pollutant metals. This scan will also be used to fulfill the annual priority pollutant scan requirement in our current SPDES permit.
- A complete acute and chronic whole effluent toxicity (WET) test during the second week of the trial when TDF is being burned at the maximum trial rate. This test requires 5 consecutive days to complete the sampling. This test will also be used to fulfill the monthly chronic WET testing requirement in our current SPDES permit for the month when the TDF trial is conducted.

The daily zinc data will be compared to the current 17.0 lb/day action level for zinc in the mill's SPDES permit. The TDF trial burn rate will be reduced, if necessary, to prevent an exceedence of this action level. The trial will be stopped immediately if a zinc action level exceedence occurs.

All of the data from this testing will be compared to our existing database for these parameters to evaluate the effectiveness of our wastewater treatment system during the TDF trial and to determine if the NYSDEC will need to modify our SPDES permit for the permanent use of TDF.

Please contact us if there are questions of if additional information is needed.

Sincerely,

International Paper

Christopher P. Mallon
Mill Manager

Stephen F. Regan
Environmental Performance Manager