

New York State Department of Environmental Conservation
Office of Environmental Quality, Region 5
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Denise M. Sheehan
Acting
Commissioner

September 14, 2005

Mr. Christopher P. Mallon, Mill Manager
Mr. Stephen F. Regan, Environmental Manager
International Paper Company, Inc.
Ticonderoga Mill
568 Shore Airport Road
Ticonderoga, NY 12883

AIR QUALITY

SEP 19 2005

RECEIVED

Re: New Discharge Notification
Proposed Tire Derived Fuel Trial Burn
State Pollutant Discharge Elimination System (SPDES) # NY-000 4413
DEC Project # 5-1548-00008/00006
Ticonderoga (T), Essex Co.

Dear Messrs. Mallon and Regan:

This letter is in response to your August 17, 2005 letter regarding the wastewater that would be generated at International Paper Company's Ticonderoga Mill if the Mill were authorized to burn tire derived fuel (TDF) on a trial basis. This issue arose during staff's review of the Mill's application to modify its Air Pollution Control Title V permit to authorize a trial burn of TDF.

Under the provisions and conditions set forth in the Mill's existing SPDES permit and 6 NYCRR Part 750-1.2(a) and 750-2, permittees are required to notify the New York State Department of Environmental Conservation (Department) when they will be accepting "new or increased discharges of pollutants." Your August 17, 2005 letter serves as the requisite notification. Furthermore, under 6 NYCRR Part 754.4(i), the Department may prohibit the discharge until the SPDES permit is modified to account for the new discharge. In this case, while I understand that no decision has yet been made on the Title V permit modification for the trial burn, staff has determined that a SPDES Permit modification will not be required in conjunction with the trial. If the trial burn is approved and subsequently conducted, staff will require that IP-Ti provide the information detailed in your August 17, 2005 letter as it becomes available.

If you have any questions or comments, please do not hesitate to contact me at (518) 623-1268.

Sincerely,

William R. Wasilauski, P.E.
Regional Water Engineer

WRW:jh