

**BOBBY JINDAL**  
GOVERNOR



**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**OFFICE OF ENVIRONMENTAL COMPLIANCE**

**VIA HAND DELIVERY**

**TIN INC.**  
c/o Corporation Service Company  
Agent for Service of Process  
320 Somerulos St.  
Baton Rouge, LA 70802-6129

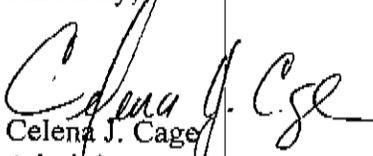
**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. WE-CN-11-01062C  
AGENCY INTEREST NO. 38936**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **TIN INC. (RESPONDENT)** for the violations described therein.

Any questions concerning this action should be directed to Wayne R. Slater at (225) 219-3729.

Sincerely,

  
Celena J. Cage  
Administrator  
Enforcement Division

CJC/WRS/wrs  
Alt ID No. LA0007901  
Attachment

c: Jay Wilson, Vice President-Environmental, Health and Safety  
Temple-Inland  
401 Avenue U  
Bogalusa, LA 70427

Alban Bush, Environmental Manager  
Temple-Inland  
401 Avenue U  
Bogalusa, LA 70427

Richard Harrell  
Mississippi Department of Environmental Quality  
Office of Pollution Control-Environmental Permitting  
P.O. Box 2261  
Jackson, MS 39225

**STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE**

**IN THE MATTER OF**

**TIN INC.  
WASHINGTON PARISH  
ALT ID NO. LA0007901**

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\*  
\* **ENFORCEMENT TRACKING NO.**

\* **WE-CN-11-01062C**

\* **AGENCY INTEREST NO.**

**PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.**

\* **38936**  
\*  
\*

**AMENDED CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. WE-CN-11-01062B**, issued to **TIN INC. (RESPONDENT)** on August 27, 2011, in the above-captioned matter as follows:

**I.**

The Department hereby amends the **FINDINGS OF FACT** section to add the following paragraphs:

**“XV.**

The Respondent submitted written correspondence dated October 12, 2011, requesting an amendment to the schedule for long term construction activities to include a third party audit of the facility.

**XVI.**

The Respondent submitted written correspondence dated October 20, 2011, requesting the Department to amend sections D, E, H and I. of the Bogalusa Mill Production Start-Up Plan in the **COMPLIANCE ORDER** section, **Paragraph VIII.**

**XVII.**

According to email correspondence from the Respondent dated October 12, 2011, the Respondent implemented the Reduction in Sampling Frequency Schedule for Sampling Continuation (Days After Startup Complete) 36-84 which includes reducing the River sampling frequency to once per

month, continued regulatory monitoring at the final Outfall with continuous monitors in place for process control, and discontinuing Mid-Pond sampling except continuous pH and conductivity will remain the same.”

## II.

The Department hereby amends sections D, E, H and I. of the Bogalusa Mill Production Start-Up Plan in the **COMPLIANCE ORDER** section, **Paragraph VIII** to read as follows:

- “D. The Respondent shall submit monthly progress reports of the Bogalusa Mill Production Start-Up activities, including the results of all sampling events to the Department and the contacts listed in the previous section. The results of all sampling performed during this production start-up activities shall be submitted to the Department on a Discharge Monitoring Report (DMR). The monthly progress reports and DMRs shall be submitted no later than the 15<sup>th</sup> of the month following the effective date of this Order. **COMPLIANCE ORDER WE-CN-11-01062C, AGENCY INTEREST NO. 38936, and LA0007901** should be referenced on all DMRs submitted in accordance with this **COMPLIANCE ORDER**. Permit Exceedances or triggering events set forth in the Bogalusa Mill Production Start-Up activities will be reported within seven (7) days of receipt of the sampling results
- E. The Respondent shall submit a final written report to the Department within fifteen (15) working days of receipt of the final BOD<sub>5</sub> analysis.
- H. The Respondent shall comply with the following escalated monitoring requirements during the Reduction in Sampling Frequency (Ramp Down) contained in the Bogalusa Mill Production Start-up Plan until re-issuance of LPDES Permit LA0007901, or until otherwise notified by the Department:
- a. Continuous pH and conductivity monitoring will be required at Outfall 001. The number of events of pH range (6.0-9.0 S.U.) excursions >60 minutes shall recorded. The total time during which the pH values are outside the required range of pH values shall not exceed 446 minutes/calendar month;
  - b. Daily BOD<sub>5</sub> monitoring shall remain at Outfall 001;
  - c. In-stream monitoring for pH, DO and conductivity in the Pearl River as contained in the final phase shall continue until the Respondent is notified in writing by the department or until re-issuance of LA0007901; and
  - d. Daily monitoring of Phenolic Compounds at Outfall 001.

- I. The Respondent shall maintain onsite, all records of continuous pH and conductivity monitoring conducted as a requirement of this **COMPLIANCE ORDER**. The Respondent shall provide the Department with copies of these records within one (1) week of receiving a request for such information.”

III.

The Department hereby amends **Attachment 1**; the Bogalusa Mill Aerated Stabilization Basin Start-up Plan as follows:

“Page 6: Location of Pearl River Sampling table corrected to remove “(Crawfords Landing)” below the entry for I-59 crossing at Pearl River”.

IV.

The Department hereby amends **Attachment 2**; the Bogalusa Mill Start-up Plan as follows:

“Page 6: Location of Pearl River Sampling table corrected to indicate Pearl River (approximately ¼ mile upstream of the confluence with Wilson Slough) will be the monitoring point instead of Walkiah Bluff.

Page 7: Summary of Proposed Reduction in Sampling Frequency table, Sampling Continuation days 36-84, “Mid-Pond sampling not required (continuous pH and conductivity remains the same at the outfall)”.

Waste Collection Sump Flows diagram corrected to indicate that the Concentrator Area only discharges into 21 Boiler Sump”.

V.

The Department hereby inserts the following paragraph into the **COMPLIANCE ORDER** section to read as follows:

“IX.

To comply with the following compliance schedules:

**Third Party Audit**

Complete Audit Team evaluation of Bogalusa Mill by **November 30, 2011**

Complete and submit the Audit Team Final report by **December 31, 2011**

Implement an Action Plan based on the Audit Team Final report by **January 31, 2012**

**Aeration Stabilization Basin**

Submit Optimization Plan by **December 31, 2011**

**Facility Construction/Upgrades**

**Ash Dewatering System**

Commence Construction by **December 31, 2011**

Complete Construction by **July 31, 2012**  
System fully operational by **August 31, 2012**

**Recovery Area Spill Collection**

Engineering Design and Specifications to be completed by **December 2011**  
Commence Construction by **March 31, 2012**  
Complete Construction by **September 30, 2012**  
System fully operational by **October 31, 2012**

**Pulp/Kiln Area Spill Collection**

Engineering Design and Specifications completed by **December 31, 2011**  
Commence Construction by **April 30, 2012**  
Complete Construction by **October 31, 2012**  
System fully operational by **November 30, 2012**

The Respondent shall submit monthly progress reports to the Enforcement Division concerning each of the above-referenced projects. The first progress report shall be due on December 15, 2011, and subsequent progress reports shall be submitted no later than the 15th of the month following the progress report period until all above-referenced projects are completed.”

VI.

The Department incorporates all of the remainder of **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. WE-CN-11-01062B** and **AGENCY INTEREST NO. 38936**, as if reiterated herein.

VII.

This **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 25 day of October, 2011.

  
Cheryl Sonnier Nolan  
Assistant Secretary  
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
Post Office Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Wayne R. Slater