

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-11-01062B  
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 Celena J. Cage at (225) 219-3710.

Sincerely,

Celena J. Cage  
Administrator  
Enforcement Division

CJC/cjc  
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**

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

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\* **ENFORCEMENT TRACKING NO.**  
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\* **WE-CN-11-01062B**  
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\* **AGENCY INTEREST NO.**  
\*  
\* **38936**  
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**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-11-01062A**, issued to **TIN INC. (RESPONDENT)** on August 24, 2011, in the above-captioned matter as follows:

I.

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

“XII.

On or about August 24, 2011, the Department issued **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, WE-CN-11-01062A**, approving the Bogalusa Mill Aerated Stabilization Basin start-up Discharge Plan. On or about August 24, 2011, the Department authorized the Respondent to discharge wastewater(s) generated as a result of implementing the Bogalusa Mill Aerated Stabilization Basin start-up Discharge Plan into waters of the state.”

XIII.

On or about August 25, 2011, the Respondent submitted the Mill Production Start-Up Plan to the Department.

XIV.

On or about August 27, 2011, the Department was made aware of challenges encountered while performing sampling at Walkiah Bluff (~17 miles below outfall), as required by the approved Bogalusa Mill Aerated Stabilization Basin start-up Discharge Plan. ”

II.

The Department hereby amends the **COMPLIANCE ORDER** section to add the following paragraphs applicable to the Bogalusa Mill Production Start-Up Plan:

“VIII.

To re-start production operations at the Bogalusa Mill and protect water quality of the Pearl River and human health, with the exceptions noted in Paragraph H of this Section, approval is hereby granted to commence operations at the Bogalusa Mill and to implement the Bogalusa Mill Production Start-Up Plan in accordance with Attachment 2. The Respondent shall comply with the following conditions during these activities:

- A. The Respondent shall receive written approval to discharge from the Office of Environmental Compliance, Enforcement Division, prior to discharge.
- B. The Respondent shall verbally notify Mike Algero and Jeff Dauzat with the Department’s Southeast Regional Office (SERO) no less than twenty-four hours (24 hours) prior to commencement of activities at the following contact telephone numbers and e-mail addresses: Mike Algero: (225) 329-9745 and [mike.algero@la.gov](mailto:mike.algero@la.gov); Jeff Dauzat: (504) 451-7577 and [jeff.duazat@la.gov](mailto:jeff.duazat@la.gov).
- C. The Respondent shall also verbally and electronically notify the following individuals no less than twenty-four hours (24 hours) prior to commencement of activities approved under this section of the Order:

Name	Representing	Telephone	Email address
Dexter Accardo	St. Tammany Parish OEP	(985) 264-1087	<a href="mailto:daccardo@stpgov.org">daccardo@stpgov.org</a>
Tommy Thiebaud	Washington Parish OEP	(985) 516-7008	<a href="mailto:tthiebaud@wpgov.org">tthiebaud@wpgov.org</a>
Chris Guilbeaux	GOHSEP	(225) 715-3191	<a href="mailto:Christopher.Guilbeaux@la.gov">Christopher.Guilbeaux@la.gov</a>
Pat Santos	GOHSEP	(225) 938-7218	<a href="mailto:Pat.Santos@la.gov">Pat.Santos@la.gov</a>
David Thomas	DHH, OPH	(985) 871-1310	<a href="mailto:David.Thomas@LA.GOV">David.Thomas@LA.GOV</a>
Ken Litzenberger	U.S. Fish and Wildlife Service	(985) 285-3335	<a href="mailto:kenneth_litzenberger@fws.gov">kenneth_litzenberger@fws.gov</a>
Cathy Wells	Senate Committee on Environmental Quality	(225) 772-8609	<a href="mailto:wellsc@legis.state.la.us">wellsc@legis.state.la.us</a>
Senator J. P. Morrell	Senate Committee on Environmental Quality	(504) 261-0535	<a href="mailto:morrelljp@legis.state.la.us">morrelljp@legis.state.la.us</a>
Nick Gatian	MS DEQ	(228) 493-7135	<a href="mailto:nick_gatian@deq.state.ms.us">nick_gatian@deq.state.ms.us</a>
Jackie Key	MS DEQ	(769) 798-5958	<a href="mailto:jackie_key@deq.state.ms.us">jackie_key@deq.state.ms.us</a>
Danny Manley	Pearl River County EMA	(601) 273-1394	<a href="mailto:dmanley@pearlrivercounty.net">dmanley@pearlrivercounty.net</a>
Mayor Charles Mizell	City of Bogalusa	(985) 516 5605	<a href="mailto:mayormizell@bellsouth.net">mayormizell@bellsouth.net</a>

The Respondent shall also provide electronic updates every twenty-four hours (24 hours) thereafter. These updates shall be provided for the first two weeks after commencement of production operations and initiation of the discharge(s) associate with this activity.

- D. The Respondent shall submit weekly 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 weekly progress reports and DMRs shall be submitted no later than the Wednesday of the week following the effective date of this Order. **COMPLIANCE ORDER WE-CN-11-01062B, AGENCY INTEREST NO. 38936, and LA0007901** should be referenced on all DMRs submitted in accordance with this **COMPLIANCE ORDER**.
- E. The Respondent shall submit a final written report to the Department within five (5) working days of completing the activities approved under this section of this **COMPLIANCE ORDER**.
- F. The Respondent shall comply with all other requirements of LPDES permit LA0007901.
- G. The Department will consider any noncompliance that occurs during implementation of the Bogalusa Mill Production Start-up Plan a violation of this **COMPLIANCE ORDER**.
- 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;
  - b. Daily BOD<sub>5</sub> monitoring shall remain at Outfall 001; and
  - 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.
- 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 week of receiving a request for such information.
- J. The Respondent shall submit to the Department, within thirty (30) days of the effective date of this Order, a schedule for conducting the third party audits required in the Mill Production Start-Up Plan.

The Respondent shall also provide electronic updates every twenty-four hours (24 hours) thereafter. These updates shall be provided for the first two weeks after commencement of production operations and initiation of the discharge(s) associate with this activity.

- D. The Respondent shall submit weekly 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 weekly progress reports and DMRs shall be submitted no later than the Wednesday of the week following the effective date of this Order. **COMPLIANCE ORDER WE-CN-11-01062B, AGENCY INTEREST NO. 38936, and LA0007901** should be referenced on all DMRs submitted in accordance with this **COMPLIANCE ORDER**.
- E. The Respondent shall submit a final written report to the Department within five (5) working days of completing the activities approved under this section of this **COMPLIANCE ORDER**.
- F. The Respondent shall comply with all other requirements of LPDES permit LA0007901.
- G. The Department will consider any noncompliance that occurs during implementation of the Bogalusa Mill Production Start-up Plan a violation of this **COMPLIANCE ORDER**.
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- 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 week of receiving a request for such information.
- J. The Respondent shall submit to the Department, within thirty (30) days of the effective date of this Order, a schedule for conducting the third party audits required in the Bogalusa Mill Production Start-Up Plan.

- K. The Respondent shall submit to the Department, within thirty (30) days of the effective date of this Order, a schedule for long-term construction activities that will be performed at the Bogalusa Mill.
- L. The Respondent shall sample at locations identified in the Bogalusa Mill Production Start-Up Plan. However, if conditions exist that prevent access to an approved location or pose a safety risk, the Respondent shall perform the sampling at an alternate location. Any alternate location shall be subject all terms and conditions of the approved plan.”

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

III.

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

Baton Rouge, Louisiana, this 27 day of August, 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: Celena J. Cage

**Attachment 2  
Bogalusa Mill  
Mill Production Start-up Plan**

**Introduction**

A plan has been developed that will allow Temple-Inland to re-start production operations at the Bogalusa Mill (here after referred to as “the Mill”) while ensuring protection of the health of the Pearl River and the safety of the community. The plan includes provisions for improved capability to manage upsets, provides additional layers of monitoring and reporting with detailed notification protocols, and includes equipment additions to improve collection and reprocessing of waste streams. The improvements in these areas will ensure the future health and protection of the Pearl River and the community.

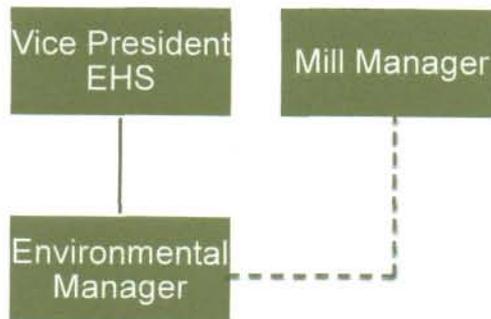
**Organizational Changes**

The current management positions in the Mill are under review. Appropriate personnel actions will take place to ensure that we have the best leadership in the key operating positions in the mill. These leadership positions, including the Mill Manager, will be required to complete additional Environmental Health and Safety (EHS) training and certification. Additionally, the Environmental Manager of the Mill will now report directly to the corporate EHS Vice President with dotted-lined reporting to the Mill Manager. The chart below illustrates the reporting structure that is in place.

**PRIOR REPORTING  
STRUCTURE**



**NEW REPORTING  
STRUCTURE**



The Mill will also form a Community Advisory Committee which will meet monthly to facilitate two way communication on issues important to citizens of the local parishes. The Mill representatives will include the Mill Manager, Environmental Manger and Human Resources Manager; community representatives will include local officials and community leaders.

In order to verify that the new organization and process improvements are being done, we will utilize third party consultants to perform audits of our systems.

### **Process Changes**

Process improvements will include increased monitoring and collection of material for re-processing. Additional tank capacity (approximately 3,100,000 gallons) will be available for spill collection by using an existing production tank until a new tank can be built. The increased monitoring includes:

- Increasing the number of diversion/collection sumps to a total of 8 locations.
- Provide redundant conductivity monitors at each of the 8 diversion sumps.
- Provide local alarm light for conductivity monitoring sumps.
- Provide real time data to mill monitoring and control system of status of diversion sump pumps, conductivity data and alarms.
- Continuous monitoring of the pH and conductivity at the clarifier, which is the input to the Aerated Stabilization Basin (ASB).

These monitoring points and tanks are show in Attachment 1.

### **Notification Changes**

The data collected will be reported to multiple layers of site and corporate management. Trigger points for actions to be taken in response to this new monitoring are in place.

Prevention of losses and containment of materials at the source is the best way to maintain consistent and reliable operations. To this end the mill has developed a tiered approach to monitoring and reacting to process changes. In general there are four levels of action to be taken by the operator depending on what process is being monitored.

- Lower Action Level – Process is adjusted and communicated by the operators. Key inputs and outputs to the process are adjusted to bring the process back into the normal range. Operator notifies supervisor.
- Hi Action Level – Aggressive action taken by operator that includes slowing down production, communication to management, implementation of surge

capacity and notification to other process areas that could be impacted. Supervisor notifies Superintendent.

- Hi-Hi Action level – Preparation to shut down processes are initiated – no authorization required – operators initiate shutdown immediately. Communication within mill and corporate management occurs. Superintendent notifies Environmental Manager, Mill Manger and VP EHS.
- Shutdown Level – Aggressive corrective action taken, process is shutdown, communications are initiated and diversion is made. Superintendent notifies Environmental Manager, Mill Manger and VP EHS.

The initial action levels are built from available data in the mill from the first half of 2011. The triggers were established using the average plus a standard deviation factor. These levels may be updated in the future if there is a statistical change in either the average or standard deviations as long as no adverse impacts on the ASB have been observed. For areas with new monitoring, similar methods will be used for developing their control charts once a minimum of three months of data are available. In the interim, trigger levels may be based on tank levels in the area or based on process knowledge.

In addition, if the action tiers at the clarifier for pH and conductivity both trigger a Hi-Hi level, then additional sampling will be performed and notification to DEQ and local officials will be provided.

The Mill Manager will be required to perform regular observation and monitoring visits to the treatment plant and river. Results of these visits will be reported in the mill daily summary report that is submitted each morning to corporate leaders.

### **Standard Operating Procedures and Training**

Each production process has SOP(s) associated with its operation. There are over seventy standard operating procedures related to production processes that have been modified to incorporate environmental and wastewater monitoring considerations. The appropriate mill personnel will be trained to incorporate these responsibilities into their day to day routine.

### **Protection of the Pearl River**

In order to ensure protection of the health of the Pearl River, if the clarifier conductivity and pH data are both at a Hi-Hi Action Level then the following additional river and ASB monitoring will be conducted:

- Upstream and downstream testing of the Pearl River for DO and pH
- More frequent predictive sampling and testing of 1-Day BOD and COD on ASB
- Communication of the data results to DEQ, local officials and Temple-Inland Mill site and corporate management

## Near Term Capital Changes

In addition to the organizational, process and equipment changes outlined above, the following capital equipment changes are in process:

- Ash removal system to capture ash for beneficial reuse vs. sending it to the treatment plants (125 tons per day)
- Increase capacity of evaporators by 10% to be able to reprocess recovered materials
- Future new tankage (5,000,000 gallons; 200,000 gallons; 150,000 gallons) - for collecting sewer process materials - (tankage that was converted will return to operational use at that time)

## Start-up Sequence

ASB and Production startup follows a stepwise sequence of activities. Prior to mill start-up, the level in the ASB needs to be dropped to ensure adequate retention time for treatment. The projected timeframe for achieving the desired level in the ASB is summarized in the following table.

Day	Estimated Weir Drop (inches)	Estimated Discharge to River (MGD)	Comments
1	0.6	2	Includes ~1 MGD from cooling water
2	3	6	Includes ~1 MGD from cooling water
3	3.6	11	Includes ~5 MGD for Day 1 of Startup
4	1.8	12	Includes ~9 MGD for Day 2 of Startup
5	No Change	16-20	Return to normal discharge rates

The steps for starting up the mill processes are illustrated in Attachment 2. Please note that times shown are for planning purposes and may be adjusted based on actual process conditions.

## Start-up Monitoring

During the process startup additional monitoring will be conducted within the mill process sewers and wastewater treatment system. In-mill process monitoring is specified in individual SOPs and includes items such as tank levels, pH and conductivity. Action triggers and notifications will be given as discussed previously.

To further protect the Pearl River, additional monitoring of the treated wastewater being discharged and the Pearl River will be conducted during the process startup. Based on the proposed timeline shown in Attachment 2, start-up ends when both machines have produced paper. This additional ASB and river monitoring will continue for a period, at which time the mill will return to required compliance monitoring.

The table below identifies the locations and frequencies of the measurements to be monitored, as well as the responsible party. In addition, action levels are shown

where applicable. If the levels shown below are reached, actions up to and including discontinue of discharge will be taken.

### Summary of Proposed Monitoring During Startup Discharges

Test Location	Test	Responsible Party	Current Frequency	Startup Frequency	Action Level
Pearl River <sup>1</sup>	DO	EBS <sup>4</sup>	1/Quarter	Every 4 hours <sup>2</sup>	DO measured at <5.0 mg/L
	pH	EBS	1/Quarter	Every 4 hours <sup>2</sup>	NA <sup>6,7</sup>
	Conductivity	EBS	1/Quarter	Every 4 hours <sup>2</sup>	NA <sup>7</sup>
Outfall	TSS <sup>3</sup>	Mill/EBS	3/week but doing 5/week	5/Week	NA
	pH	Mill/EBS	3/week	Continuous <sup>5</sup>	8.9
	BOD <sub>5</sub>	Mill/EBS	3/week	7/week	NA
	DO	Mill/EBS	NA	Every 4 hours <sup>2</sup>	NA
	DOUR	EBS	2/week	7/week	>6mg/L/hour
	BOD <sub>1</sub>	Mill/EBS	7/week	7/week	NA
	COD	Mill/EBS	7/week	7/week	NA
	Conductivity	Mill/EBS	NA	Every 4 hours <sup>2</sup>	NA <sup>7</sup>
Mid-ASB (East Pond Rainbird)	Microscopic Maturity Index	EBS	1/week	1/week	<1.1
	DOUR	EBS	2/week	7/week	>6mg/L/hour
	Microscopic Maturity Index	EBS	1/week	7/week	<1.1
	Nutrients - P	EBS	1/week	7/week	NA
	Nutrients - N	EBS	1/week	7/week	NA
	pH	EBS	1/week	Every 4 hours	NA
	COD	EBS	1/week	Every 4 hours	NA
	Conductivity	EBS	1/week	Every 4 hours	NA <sup>7</sup>
DO	EBS	1/week	7/week	NA	

1. Locations of Pearl River sampling:

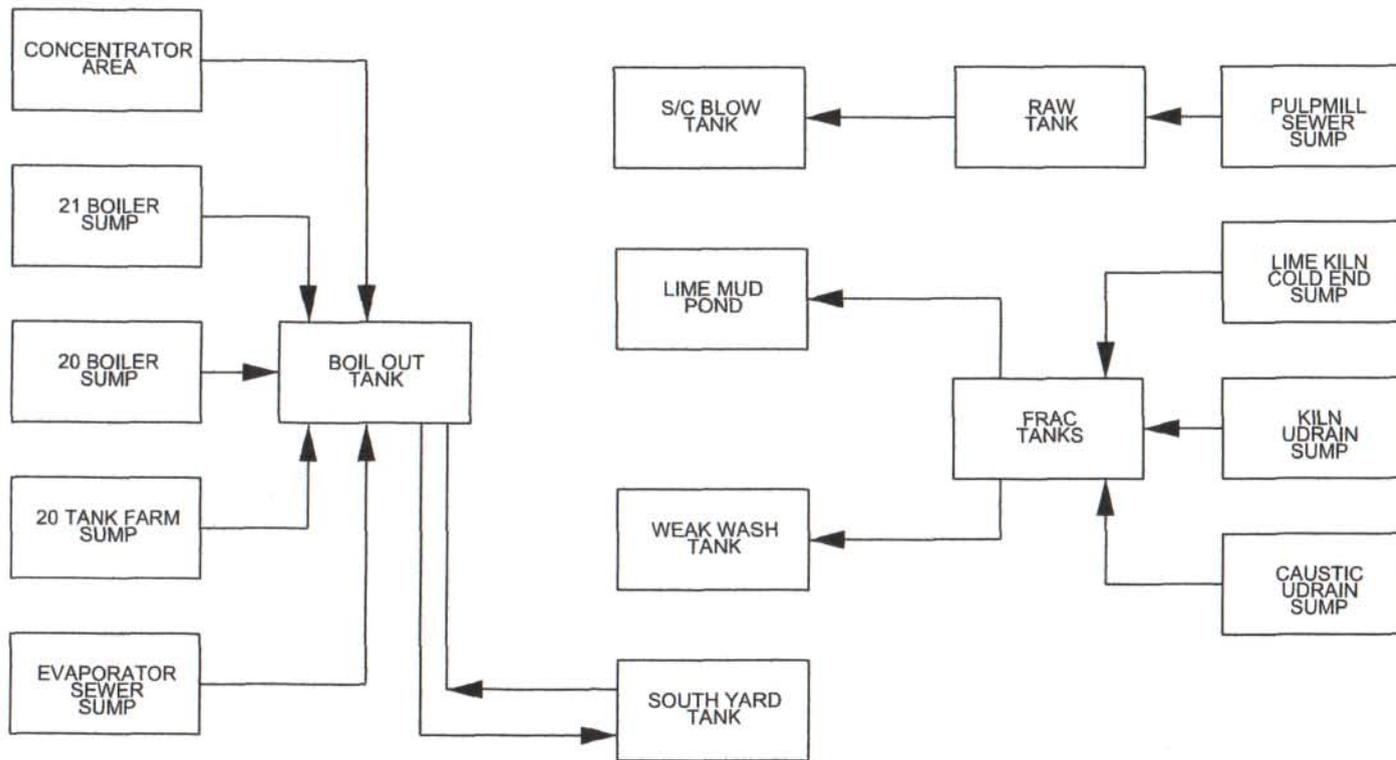
Location	Latitude	Longitude
Below Mouth of Coburn Creek (upstream of outfall, below mouth of Coburn Creek)	30°46.579' N	89°49.752' W
Mill Outfall	30° 46.563' N	89°49.681' W
Richardson Landing (~1 mile below outfall)	30° 45.751' N	89°49.845' W
Above Walnut Bluff (~4 miles below outfall)	30° 43.602' N	89°50.115' W
Above Pools Bluff (~8 miles below outfall)	30°42.531' N	89°50.533' W
Above split in Pearl River (~30 miles below outfall)	30° 34.132' N	89°48.456' W
Walkiah Bluff (~32 miles below outfall)	30°34.223' N	89°47.376' W
I-59 crossing at Pearl River (~49 miles below outfall)	30°23.027' N	89°44.142' W

2. Monitoring will only be performed during daylight hours.
3. TSS – Total Suspended Solids
4. EBS – Environmental Business Specialists, LLC
5. Continuous monitor will be in place at the outfall and grab samples will be performed approximately every 4-hours for verification
6. Discharge discontinued if pH of treated wastewater is 8.9
7. Typical water quality measurement only

NOTE: COD, BOD<sub>1</sub>, BOD<sub>5</sub>, and TSS tests take several hours to days to run, so do not give real time results.

## Summary of Proposed Reduction in Sampling Frequency

Sampling Continuation (Days after Startup Complete)	Description of frequency Change
1-7	<ul style="list-style-type: none"> <li>• Same sampling program as proposed for startup period</li> </ul>
8-14	<ul style="list-style-type: none"> <li>• River sampling program reduced to twice per day</li> <li>• Outfall sampling program remains the same</li> <li>• Mid-Pond sampling program remains the same</li> </ul>
15-21	<ul style="list-style-type: none"> <li>• River sampling program reduced to once per day</li> <li>• Outfall sampling                             <ul style="list-style-type: none"> <li>○ Every 4-hours reduced to every 8-hours</li> <li>○ Daily and continuous samples remain the same</li> </ul> </li> <li>• Mid-Pond sampling program goes to 2/day for pH, COD and conductivity</li> </ul>
22-35	<ul style="list-style-type: none"> <li>• River sampling frequency reduced to once per week</li> <li>• Outfall sampling                             <ul style="list-style-type: none"> <li>○ Every 8-hours sampling no longer required</li> <li>○ Daily samples and continuous monitors remain the same</li> </ul> </li> <li>• Mid-Pond sampling reduced to 1/day for pH, COD and conductivity</li> </ul>
36-84	<ul style="list-style-type: none"> <li>• River sampling frequency reduced to once per month</li> <li>• Outfall sampling returns to required regulatory monitoring with continuous monitors in place for process control</li> <li>• Mid-Pond sampling not required (continuous pH and conductivity remains the same)</li> </ul>



NO	DATE	BY	ARCH	MECH	ELECT	REVISIONS

DRAWN BY	DLB	DATE	8/25/11
CHECKED BY	AFE #	EFN #	
APPROVALS	CADD FILE		
SCALE			

**WASTE COLLECTION SUMP FLOWS**

**Temple-Inland**  
Bogalusa Mill

DRAWING NUMBER	REV.
B-12746	0

### Bogalusa Mill Time Line for Proposed Process Unit Start-up

ID	Name	Duration	H-15	H-7	H2	H10	H18	H26	H34	H42	H50	H58	H66	H74	H82
1	Relieve water header pressure and charge mill water headers	0 hrs			◆										
2	Rinse RO Units/Demineralizers and charge natural gas system	4 hrs			■										
3	Start Woodyard	1 hr			■										
4	Charge steam headers with PB10C and open necessary steam drains millwide to remove condensat	12 hrs			■										
5	Start boiler feedwater pumps and fuel oil system	5 hrs			■										
6	Start slaker and begin to warm kiln	21 hrs			■										
7	Start Recovery Boiler 20 and Power Boiler 12	8 hrs			■										
8	Start Turbine Generator 8	8 hrs			■										
9	Start Turbine Generator 10, Concentrator, and Recovery Boiler 21	8 hrs			■										
10	Start-up evaporator	11 hrs			■										
11	Start-up semi-chem digester, 2-Stage washer, and Lime Kiln	6 hrs			■										
12	Transition Boiler 12 to bark	0 hrs									◆				
13	Start-up screening system, rejects system, and prepare kraft digester for acid Cleaning	4 hrs									■				
14	Start-up Paper Machine 8	2 hrs									■				
15	Start-up TG9	2 hrs									■				
16	Acid Clean Kraft Digester	16 hrs									■				
17	Start-up Kraft Digester	8 hrs									■				
18	Kraft Digester building HD inventory	4 hrs									■				
19	Start-up Paper Machine 7	2 hrs									■				