



INTERNATIONAL  PAPER

Benefits of E4 Program Participation

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Background – Franklin Mill

- **Long-standing company & community presence**
 - Forest products operations in Franklin since 1887
 - Union Camp Corporation: 1956 – 1999
 - International Paper: 1999 – present
- **Historical diversity of products**
 - Lumber (Camp brothers)
 - Unbleached packaging paper (Camp Manufacturing Company)
 - Bleached paper (Union Camp)
 - Uncoated free sheet (IP)
 - Fluff pulp (IP)
 - Tissue (ST Tissue)

Franklin Mill – Outstanding Environmental Track Record

- Virginia DEQ Extraordinary Environmental Enterprise (E4) site
- EPA National Environmental Performance Track site
- Governor's Environmental Excellence Award winner (twice)

Virginia DEQ Extraordinary Environmental Enterprise (E4) Site

- **Awarded Virginia DEQ's highest award for Environmental Excellence – E4 status (August 2005)**
 - One of 28 members at this level
- **Requirements for acceptance:**
 - Excellent compliance history, Environmental Management System, public outreach, voluntary commitments to go beyond compliance, onsite audit

E4 Participation Benefit #1 – Site Wide Emissions Cap NSR Variance

- **Alternate Compliance Method**
- **Established site-wide caps on emissions at levels BELOW historical levels**
 - Virginia regulation: 9 VAC 5 Chapter 230
 - Ensures **NO INCREASES** in annual pollutant emissions regardless of mill changes (physical or operational)
 - Different New Source Review compliance method than “traditional” project-by-project review
 - Frees up scarce IP and DEQ resources
- **Required IP/DEQ partnership to implement**
 - New, innovative approach
 - Facilitated by IP’s history of environmental stewardship
 - Familiarity + trust = cooperation

Benefit #2 – Extension of Site Wide Cap to Tenants

- **2011-2012: Reconfiguration of Franklin Site**
 - IP: convert to single-line fluff pulp mill
 - Idle equipment/space leased to tenants
 - Rebuild regional employment and tax base
- **NSR variance provisions extended to tenants**
 - Single site for NSR purposes
 - Continued IP presence/commitment to E4 goals
 - DEQ: established and trusted relationship
 - History of “beyond compliance” = future compliance assurance