Georgia-Pacific

Palatka Pulp and Paper Operations
Consumer Products Division
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April 5, 2005

Trina L. Vielhauer, Chief
Bureau of Air Regulation
State of Florida
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Georgia Pacific Palatka Mill
Title V Permit No. 1070005-029-AV
Request to Replace the Lime Kiln Shell and Associate Tube Coolers
Project No.: 1070005-030-AC/PSD-FL-345
Draft Response to RAI #2

Dear Ms. Vielhauer:

Georgia-Pacific Corporation (GP) has received the Florida Department of Environmental Protection's (FDEP's) second request for additional information (RAI #2), dated January 7, 2005. We believe that in order to resolve all the issues raised in RAI #2, GP and FDEP need to have a meeting or conference call as soon as it can be arranged. In the meantime, please consider the enclosed as **draft responses** to each of the Department's questions.

1. **In the October 1, 2004 RAI, a cost analysis of a new lime kiln with tube coolers of like-and-kind pursuant to the definition of an "affected facility" in accordance to 40 CFR 60, Subpart BB, was requested. The response just provided a total cost estimate with no itemized breakdown for a new lime kiln. Again, please provide a cost analysis of a new lime kiln with tube coolers of like-and-kind pursuant to the definition of an "affected facility" in accordance to 40 CFR 60, Subpart BB, and 40 CFR 63, Subpart MM. Please be sure to provide within the analysis the ability to distinguish the "capital costs" from other costs of a new lime kiln. If the proposed modified lime kiln becomes subject to either or both of these regulations, then the BACT determination's starting base emissions will be much lower than the original submission and the proposed BACT determination will have to be reevaluated and resubmitted.**

As shown in Table No. 1, the itemized costs for a new lime kiln with like-kind tube coolers, would total $20-22 million ($12 million for equipment and $8 million for installation). Since the time the permit application was submitted, we have determined that the engineering costs that were provided were for an entire causticizing facility. The appropriate replacement cost for the Lime Kiln is as shown in Table No. 1."

2. **Due to the age and physical deterioration of the existing lime kiln, the apparent reduction of actual production efficiency over the years of operation, the recent replacement of the ID fan (May 2004) and the upcoming replacement of the burner, this current request to replace the hot end of the lime kiln, including the associated tube coolers, does not appear to be routine maintenance. This project appears to be**

a physical modification of the existing lime kiln to improve reliability of lime (CaO) production, allowing for an increase in actual emissions and production and, therefore, be able to potentially increase actual emissions and production from upstream and downstream emissions unit operations to the lime kiln. Please explain why these collective changes should be considered routine maintenance.

GP is not claiming that the Lime Kiln Shell project is "routine" maintenance; just that it is "maintenance." As stated in the Executive Summary of our PSD permit application, GP conducted a PSD applicability assessment for the project because this type of repair is not made on a routine basis. As explained in our PSD permit application, this is strictly a maintenance project, and preventative maintenance at that. In November 2003, the Lime Kiln experienced a very serious failure of the shell with cracks all the way through the shell in several different areas of the hot end. This outage resulted in unbudgeted maintenance and maintenance-related costs of $1.5 million. These costs were escalated due to the fact that the failure was very serious and repairs had to be made quickly. The Lime Kiln has not experienced maintenance-related downtime since and it is not a bottleneck at the Mill. This is strictly a maintenance project that is focused on a single piece of equipment, the Lime Kiln, in order to prevent very serious failures in the future. There are no other sources that will be impacted as a result of this maintenance project.

3. **Independent funding of various projects does not establish independence of the activity and remove the potential of a modification or new construction from being a Phased PSD Project or to be considered one. Hence, all contemporaneous emission changes that have occurred over the last five years shall be considered contemporaneous with this proposed activity. Therefore, please establish the past contemporaneous emission changes and evaluate them in conjunction with the emission changes proposed for this project for significant impact analyses, increment consumption and ambient air quality impact analyses. Also, please include any future contemporaneous emission changes that will be associated with and affected by this proposed change from other emission unit operations, both upstream and downstream.**

This is one of the primary issues we need to discuss face-to-face. GP is not sure what the Department's concern is here. If the Department is saying that the prior contemporaneous projects and even future projects are all part of the same project (*i.e.*, a "phased" PSD project) and need to be evaluated together for purposes of determining PSD applicability, GP strongly disagrees, for the reasons explained subsequently, in part 3A. If the Department is saying that prior contemporaneous and future projects must be considered only for purposes of the air quality modeling analysis, this is not normally required in other states, nor has it been required for other projects in Florida in the past. However, GP is in the process of completing this analysis for the FDEP and it should be submitted this week, along with the flow rate revisions that were referenced in the answer to Question 8 of our response to RAI #1 (December 7, 2004 letter to Ms. Trina Vielhauer). To the extent the Department wants GP to include "any future contemporaneous emission changes" from other, still speculative, projects, we disagree (see part 3B). The contemporaneous period for this project ends when operation begins following completion of the maintenance activities.

A. While Georgia-Pacific agrees that the factor mentioned above, "independent funding", alone, does not establish the "independence" of the projects, it is one of many factors that has been consistently considered by EPA and states as part of past determinations on this topic.

EPA guidance, over a period of almost 25 years, makes it clear that emission increases from small (less than PSD-significant) projects are not aggregated for purposes of determining PSD applicability and Best Available Control Technology (BACT) unless it appears that the source deliberately split a larger project into smaller pieces to circumvent PSD review. The bulk of this guidance, up through and including that contained in the 1990 draft New Source Review Manual, suggests that a finding of PSD circumvention must be based on clear evidence that the source consciously tried to avoid PSD by knowingly misrepresenting the scope and relationship of the individual projects. In the only EPA Headquarters memo that we are aware of since 1990, the June 1993 3M-Maplewood memo, EPA set out "objective" criteria which it used to determine retroactively whether a source circumvented PSD. Even that memo suggests that all of the facts and circumstances regarding the projects in question, including five identified criteria, should be considered in determining whether the work constitutes separate projects or one phased project. And even that memo does not suggest that all projects with associated emission increases within a five-year period must be rolled up into one as "contemporaneous" projects.[1]

Georgia-Pacific relied on EPA's past determinations in concluding that the projects that have been, or will be, undertaken at the Palatka Mill are separate projects, rather than mere components of a phased project. We summarize the key determinations below.

One of the earliest (1983) determinations, from Sheldon Meyers to David Howekamp, squarely states the issue as "whether sources and control agencies need to aggregate small changes (*i.e.,* those below de minimus levels) which occur over time so that once the cumulative effect of the changes exceeds de minimus levels, PSD is triggered." The memo concludes that PSD is not triggered in this situation:

> *"...the Agency has maintained since 1981 that no such aggregation is required. This interpretation was first articulated in a memo from SSCD...to Region VII dated January 22, 1981, and has been reiterated in memoranda to Region IX and X since then. The SSCD interpretation was concurred in by the Office of General Counsel (Peter Wyckoff) as legally supportable..."*

A subsequent memorandum (October 21, 1986) from Darryl Tyler to David Kee reiterates this conclusion. While the situation addressed in this memorandum (a minor source that becomes major through a series of modifications) is somewhat different than the situation being questioned for the Palatka Mill, the findings are still relevant. This memorandum concludes that

> *"In the extreme case where the source has made a deliberate effort to circumvent PSD review (by the systematic construction of carefully sized emissions units which only in the aggregate would trigger review) a permitting agency, may, however, make a finding that PSD applies to the total plant. Such a finding would have to be based on clear evidence that the source made a conscious effort to escape review by knowingly misrepresenting the intended source size through the calculated juggling of actual and scheduled construction of emission units."*

This determination clearly directs state agencies to consider the funding relationships that exist between various projects, although the FDEP conversely states in its question that this factor does not establish independence of projects.

[1] The 3M situation was extreme. The facility, a research and development center, had obtained four synthetic minor construction permits within six months and twelve within eighteen months. The focus of EPA's inquiry was whether the facility had intentionally permitted new units or processes at synthetic minor emission levels, knowing that the projects were part of a larger project for which emission increases exceeded "major modification" levels.

A September 1989 memo from John Calcagni to William Hathaway reaffirms EPA's prior policy on non-aggregation in the context of determining whether a "net emissions increase" from a project should include prior de minimis increases. EPA determined that it should not:

> *"...the Environmental Protection Agency's (EPA's) historic policy has been not to consider accumulated emissions from a series of small (i.e., less than significant) emissions increases if the emissions increase from the proposed modification to the source is, standing alone without regard to any decreases, less than significant. In other words, the netting calculus (the summation of contemporaneous emissions increases and decreases) is not triggered unless there will be a significant emissions increase associated with the proposed modification. This policy was discussed in detail in a 1983 EPA memorandum...titled "Net Emission Increases Under PSD". In October 1988 the Policy and Guidance Section of the Stationary Source Compliance Division (SSCD) sent a memorandum to Region V restating the policy and indicating that is applied only to applicability determinations made under PSD...we understand that there are no plans to revise this policy."*

EPA went on to review the underlying policy considerations, and reaffirmed those as well, along with the non-circumvention rules:

> *"This office has reviewed the considerations (as discussed in the 1983 memorandum) which led to the policy and continue to find them to be reasonable and appropriate...The PSD reviews of such small emissions could place a significant resource burden on both applicants and review agencies and would likely result in minimal, if any emissions reductions or air quality benefits from the application of BACT. Consequently, I reaffirm that EPA's current policy is not to aggregate less than significant increases at a major source when the emissions increase from a proposed modification is less than significant. Of course, attempts by applicants to avoid PSD review by splitting a modification into two or more minor modifications constitutes circumvention of the PSD requirements. Two or more related minor changes over a short period of time should be studied for possible circumvention."*

EPA's 1990 Draft New Source Review Workshop Manual is very clear with regard to the Agency's policy on project aggregation. On Page A.33, EPA states the following:

> *"A modification is subject to PSD review only if (1) the existing source that is modified is "major," and (2) the net emissions increase of any pollutant emitted by the source, as a result of the modification, is "significant," i.e., equal to or greater than the emissions rates given on Table A-4..."*

As for "accumulation of emissions", the manual states the following (p. A.36):

> *"If the proposed emissions increase at a major source is by itself (without considering any decreases) less than "significant", EPA policy does not require consideration of previous contemporaneous small (i.e., less than significant) emissions increases at the source. In other words, the netting equation (the summation of contemporaneous emissions increases and decreases) is not triggered unless there will be a significant emissions increase from the proposed modification."*

The Manual then restates EPA's circumvention policy:

> *"A deliberate decision to split an otherwise "significant" project into two or more smaller projects to avoid PSD review would be viewed as circumvention and would subject the entire project to enforcement action if construction on any of the small projects commences without a valid PSD permit."*

The latest EPA HQ memorandum that we are aware of is 3M-Maplewood (June 17, 1993). That memo was a retrospective enforcement response to a series of twelve minor construction permits issued to an R&D facility within an eighteen-month period, presumably for successive capital projects designed to allow initiation or enhancement of the facility's research capabilities. In that context, EPA suggested a number of criteria for use in determining "whether a source is circumventing major NSR through the minor modification process": (1) whether the source has filed more than one minor source or minor modification request within a "short time period"; (2) whether the project would be funded, or whether it would be economically viable for an extended period, without the other projects; (3) whether the source has projected consumer demand or production levels that cannot be reached at the requested permit levels; (4) whether the source has made representations to EPA or the state that indicate an intent to circumvent major NSR; and (5) the "economic realities" of the projects when considered together (i.e., whether the projects are so intrinsically related to each other, in terms of physical proximity, stages of the production process, and effect on the plant's economic viability, that they must logically be considered together). Using these criteria, EPA concluded with respect to 3M that the successive modifications had been improperly permitted.

The 3M memo merely clarified EPA's longstanding non-circumvention rules that apply when a source has tried to evade PSD by constructing a large project in smaller pieces, i.e., "where it appears obvious that a proposed source or modification, by its physical and operational design characteristics, could not economically be run at minor source levels for an appreciable length of time", in which cases EPA "will consider minor source limits taken by the source unrealistic and sham." (3M memo, p.3).

The 3M situation is not comparable to the Palatka situation. Most of the recent projects at the Palatka Mill are either for maintenance purposes or to comply with a new regulatory requirement. The projects that the Department has sought to combine – replacement of the lime kiln shell and coolers, bark hog replacement, and MACT compliance projects – are not intrinsically related to each other in terms of physical proximity, production, purpose, or Mill viability, and in fact are completely unrelated except with regard to their timing.

More importantly, the Mill is not trying to circumvent PSD for anything. All of these projects have either netted out of PSD review, have undergone PSD review, or have been authorized under a pollution control project (PCP) exclusion. The application at hand, for the lime kiln shell replacement and coolers, is undergoing PSD review for nitrogen oxides, particulate matter, ozone (due to a significant increase in volatile organic compounds), and total reduced sulfur compounds. Furthermore, the conclusion regarding this applicability is the same, regardless of whether a contemporaneous netting analysis is conducted or not. The Mill clearly has not attempted to avoid PSD or any associated modeling or other obligation for any units being modified. Therefore, the concerns that might prompt a 3M-type analysis of all of the projects combined are not present here.

In short, it is clear that EPA, over the years, has developed consistent criteria that may be used by regulatory agencies in determining if projects are related, and should therefore be aggregated for PSD applicability purposes. The guidance is designed to prevent or ensure enforcement attention to cases where it appears that sources have deliberately avoided major NSR obligations by constructing new or modified sources with minor source permits, only to increase emissions overall in a way that would have required preconstruction NSR review if the overall project had not been artificially divided.

In the case of the Palatka Mill, none of these criteria has been met as part of the recent permitting activities. None of the projects has resulted in the filing of a minor source permit application – all of the projects that have been mentioned by FDEP have undergone PSD review. Moreover, the projects have been conducted for very different reasons and under different funding. For the most part, these projects involve maintenance activities that are required for the purposes of worker and/or public safety. Finally, production increases are not expected as a result of any of these projects – they all involve cost savings, operating flexibility, and maintenance.

If the FDEP does not accept these facts, GP requests feedback from FDEP regarding their decision, including references to past FDEP and EPA policy decisions on this subject, where appropriate.

B. GP does not believe that it is appropriate or even practicable to include potential **future** emission changes from unrelated projects in the current evaluation of the lime kiln shell project. Future projects that the Mill may or may not be considering, for which budgeting authorization and planning are not even complete, let alone final, cannot be lumped in with the current lime kiln shell project. When any such unrelated projects are final enough to be presented in a permit application, GP will include a full and appropriate PSD and air quality evaluation of them in a permit application. GP does not intend to avoid any PSD or other permit obligations by applying for such projects separately.

To the extent the Department is simply saying that any upstream/downstream emission changes that would result from the lime kiln shell project itself should be included and properly evaluated in the current application, GP agrees and routinely follows this methodology in conducting evaluations for PSD applicability. As explained in our PSD permit application and in our answer to Question 2 above, this is strictly a maintenance project. As mentioned above, the very serious failure in late 2003 resulted in unbudgeted maintenance and maintenance-related costs of $1.5 million. The Lime Kiln has not experienced maintenance-related downtime since and it is not a bottleneck at the Mill at any rate. This is strictly a maintenance project that is focused on a single piece of equipment, the Lime Kiln, in order to prevent serious failures in the future. There are no other sources that will be impacted as a result of this maintenance project.

4. **You did not provide an adequate response to the original request (#4) previously submitted in the RAI dated October 1, 2004. For PSD purposes, please provide the daily production rate of the lime kiln for the last two years (24-months) in order to determine the baseline production rate of the lime kiln; and please include 2004 data.**

Please see Table No. 2 for the daily production rates and note that this data is considered *Confidential Business Information (CBI)*. The annual CaO produced (as calculated from lime mud) for 2002-2004 was 111,564 tons/yr, 112,423 tons/yr, and 111,731 tons/yr; respectively. Please note that these values are slightly different than the values in the original application and the application will be updated accordingly.

5. **You did not answer the question (#6) previously submitted in the RAI dated October 1, 2004. Even though the information is attempting to state that the Kiln shell portion and tube coolers that are being replaced are part of a maintenance project, will the proposed changes allow for an increase in production from its present configuration and operation? A yes or no is the preferred response.**

No increase in production is anticipated as a result of this project. After the repairs in 2003 there has not been any downtime in 2004 due to the existing shell or tube coolers. This project is being conducted in order to prevent lost production in the future that would eventually result, for any piece of equipment, if that equipment were not properly maintained.

6. **You did not answer the question (#7) previously submitted in the RAI dated October 1, 2004. Will there be an increase in production from the baseline production rate (see No. 4, above) after the proposed changes are completed? A yes or no is the preferred response.**

None is anticipated. See response to Question #5.

7. **Was the new ID fan that was installed in March 2004, sanctioned under an air construction permit? If so, please provide the project number. Also, please provide the design calculations and vendor order for the latest ID fan.**

It might be helpful to note at the outset that the ID fan consists of four basic components: the motor, the fluid drive, the wheel and shaft, and the housing. Since 1976, the Mill has always maintained on-site spares for the first three components. Motor and fluid drive maintenance has occurred on an annual or biennial basis depending upon the condition of the units during routine inspections. In May 2004, the Mill replaced the housing and the wheel and shaft. The components that were installed in May 2004 were consistent with the Original Equipment Manufacturer's (OEM) equipment. GP conducted a detailed review and considered this work to be routine maintenance that did not require a construction permit.

Note that, while the ID fan is important to the operation of the Lime Kiln, it is not by itself a major component of the Lime Kiln facility. The fan components were replaced during a routine Lime Kiln outage. The intent of the replacement was to maintain then-current operations, not to expand production. The new fan wheel, shaft and housing cost about $100,000 or about 0.5% of the cost of a new Lime Kiln, and it was funded through maintenance accounts.

The design parameters for the fan are shown in the response to Question No. 9.

8. **Please provide all of the dates that the ID fan has been replaced since the existing lime kiln was built.**

Maintenance records are limited for any time period prior to January 1999. The manager of the area has been with GP since 1976, however, and he has provided his best recollection of historical events along with current practices. We cannot be sure that the dates and events are entirely accurate, but we provide this in a good faith attempt to answer the question.

To the best of this manager's recollection, the ID fan as a whole (*i.e.*, all four components) had never been totally replaced at once. The motor and fluid drive have always been inspected annually and repaired when necessary (typically about every 1-2 years). Historically, the fan wheel is replaced and the shaft is remachined about every 10 years. The fluid drive and the fan wheel were both replaced in 1994. At that time the fan was also "tipped" (added three inches to the fan blades) at a cost of less than $10,000 prior to putting it back in service. The tipping was needed solely in order to improve the efficiency of the dust collectors/scrubbers installed at that time to collect and recycle lime.

There are two methods for tipping a fan (i.e. on the ends or on the sides). "End tipping" is performed to increase static pressure while "side tipping" is done to increase airflow. In the case of the GP lime kiln "end tipping" was done in order to overcome the head losses due to the added ductwork for the dust collector system.

Testing prior to tipping showed about 95,000 acfm at 31" static pressure and tipping was expected to result in 85,000 acfm but at 36" static pressure. The ID fan housing was replaced in 2004, along with the components mentioned above that have been routinely replaced. The current ID fan is similar to the original (untipped) fan but lime kiln operations intend to tip the current fan for the same reasons that tipping was done in 1994.

9. **On all of the previous and new ID fans, please provide the design fan characteristics for each unit, including their rpms, pressure drops, curves, volumetric flow rates, etc. In addition and for the previous/last and new ID fans, please provide the volumetric flow rates established in the performance tests conducted on the lime kiln since 1998.**

As mentioned above, maintenance records are limited prior to January 1999 when the current maintenance computer system was put in service. Also, as mentioned above, the ID fan as a whole has never been totally replaced; rather its components have been replaced, as maintenance needs dictated. With that understanding, the specifications available in our maintenance files are the following for the original ID fan installed in 1976:

3530-DIDW fan designed for 100,000 acfm at 36 inches static pressure.
Speed = 1,157 RPM and load = 810 Brake HP
Inlet design conditions = 85,000 acfm at 450 deg-F and 34.95% humidity.
Exit design conditions = 65,520 acfm at 172 deg-F and 45.96% humidity.

Volumetric flow rates established in performance tests since 1998 are as follows:

Year	Flow Rate(acfm)/dscfm		Year	Flow Rate (acfm) /dscfm
1998	47,800/35,600		2002	55,800/38,300
1999	50,200/38,500		2003	55,000/42,800
2000	63,400/42,600		2004 (Mar)	64,800/54,200
2001	57,000/43,300		2004 (Aug)	70,500/51,300

10. **If any of this RAI's responses require any changes to the pollutant emissions and subsequent modeling issues, specifically significant impact analyses, increment consumption and ambient air quality impact analyses, then please make sure that these changes are addressed in the associated modeling and increment**

requirements and exercises per the regulations. Therefore, the previous RAI's #10 will be restated in case there is/are some emissions change in the response(s) to this RAI:

> **Pursuant to Rule 62-212.400(5)(h)5., F.A.C., please provide the information relating to the air quality impacts of, and the nature and extent of, all general commercial, residential, industrial and other growth that has occurred since August 7, 1977, in the area the facility or modification would affect.**

Per our response to the Agency's Request for Information (letter from Georgia-Pacific to Ms. Vielhauer, dated December 7, 2004), a letter is being submitted under separate cover that provides the updated information for the application as referenced in our answer to Question 8 in RAI #1. Also, an updated air quality analysis, reviewing all contemporaneous emission changes, should be submitted to FDEP this week.

11. You did not answer the question (#11) previously submitted in the RAI dated October 1, 2004. For the potential applicability of 40 CFR 60, Subpart BB, please use Appendix C, 40 CFR 60, to determine if there is/are an emissions rate increase for the pollutants affected by this project.

Georgia-Pacific did provide an answer to Question 11 in our response to the Agency's Request for Information (letter from Georgia-Pacific to Ms. Vielhauer, dated December 7, 2004). Per our response in that letter, we did not, and still do not, feel that the test is required, nor is it warranted in this situation.

As stated in the opening paragraph, GP would like to meet with FDEP regarding all the issues raised in RAI's #1 and #2 to make sure that we understand each other. I will be contacting your office to set up the meeting.

Please contact me at 386-329-0918 if you have questions.

Sincerely;

Myra Carpenter
Environmental Superintendent
Georgia-Pacific, Palatka Operations

Attachments: 2

cc: W. Jernigan, S. Matchett, T. Wyles, E. Jamro

Table No. 1 - LIME KILN CONSTRUCTION COSTS
BASIS - NOMINAL 390 TPD (as CaO) PLANT

LK Component Description	COST - $ Million Equipment	Installation	Total
Kiln	2.4	1.6	4.0
Concrete / Foundations	1.8	1.2	3.0
Steel	1.2	0.8	2.0
Pollution Control	1.2	0.8	2.0
E&I / Controls	1.8	1.2	3.0
Material Handling / Tanks	1.8	1.2	3.0
Burners / Fans / Misc.	1.8	1.2	3.0
			+10%
TOTAL	12	8	20-22

Table No. 2-c LIME PRODUCTION - 2002

Lime Mud =	278,910	Tons / yr	
Lime as CaO =	111,564	Tons / yr	

Highest Production Days: 11/26

1Q2002	Lime mud, TPD	2Q2002	Lime mud, TPD	3Q2002	Lime mud, TPD	4Q2002	Lime mud, TPD
January 1, 2002	890	April 1, 2002	874	July 1, 2002	844	October 1, 2002	904
January 2, 2002	895	April 2, 2002	873	July 2, 2002	842	October 2, 2002	785
January 3, 2002	854	April 3, 2002	874	July 3, 2002	849	October 3, 2002	800
January 4, 2002	895	April 4, 2002	876	July 4, 2002	852	October 4, 2002	541
January 5, 2002	816	April 5, 2002	867	July 5, 2002	825	October 5, 2002	718
January 6, 2002	679	April 6, 2002	864	July 6, 2002	846	October 6, 2002	889
January 7, 2002	842	April 7, 2002	628	July 7, 2002	846	October 7, 2002	915
January 8, 2002	667	April 8, 2002	down	July 8, 2002	841	October 8, 2002	913
January 9, 2002	706	April 9, 2002	down	July 9, 2002	841	October 9, 2002	915
January 10, 2002	562	April 10, 2002	down	July 10, 2002	838	October 10, 2002	805
January 11, 2002	552	April 11, 2002	down	July 11, 2002	837	October 11, 2002	912
January 12, 2002	557	April 12, 2002	down	July 12, 2002	837	October 12, 2002	918
January 13, 2002	523	April 13, 2002	down	July 13, 2002	838	October 13, 2002	868
January 14, 2002	566	April 14, 2002	down	July 14, 2002	676	October 14, 2002	909
January 15, 2002	742	April 15, 2002	down	July 15, 2002	726	October 15, 2002	905
January 16, 2002	773	April 16, 2002	down	July 16, 2002	699	October 16, 2002	898
January 17, 2002	605	April 17, 2002	down	July 17, 2002	847	October 17, 2002	573
January 18, 2002	610	April 18, 2002	down	July 18, 2002	830	October 18, 2002	449
January 19, 2002	617	April 19, 2002	down	July 19, 2002	832	October 19, 2002	871
January 20, 2002	869	April 20, 2002	504	July 20, 2002	831	October 20, 2002	879
January 21, 2002	862	April 21, 2002	607	July 21, 2002	844	October 21, 2002	880
January 22, 2002	898	April 22, 2002	652	July 22, 2002	849	October 22, 2002	881
January 23, 2002	852	April 23, 2002	761	July 23, 2002	861	October 23, 2002	877
January 24, 2002	881	April 24, 2002	455	July 24, 2002	868	October 24, 2002	886
January 25, 2002	794	April 25, 2002	802	July 25, 2002	840	October 25, 2002	864
January 26, 2002	866	April 26, 2002	829	July 26, 2002	854	October 26, 2002	479
January 27, 2002	814	April 27, 2002	810	July 27, 2002	849	October 27, 2002	77
January 28, 2002	876	April 28, 2002	843	July 28, 2002	751	October 28, 2002	212
January 29, 2002	871	April 29, 2002	695	July 29, 2002	768	October 29, 2002	268
January 30, 2002	828	April 30, 2002	476	July 30, 2002	793	October 30, 2002	438
January 31, 2002	672	May 1, 2002	674	July 31, 2002	772	October 31, 2002	714
February 1, 2002	down	May 2, 2002	783	August 1, 2002	802	November 1, 2002	753
February 2, 2002	down	May 3, 2002	712	August 2, 2002	691	November 2, 2002	804
February 3, 2002	down	May 4, 2002	800	August 3, 2002	702	November 3, 2002	791
February 4, 2002	756	May 5, 2002	856	August 4, 2002	725	November 4, 2002	804
February 5, 2002	828	May 6, 2002	878	August 5, 2002	800	November 5, 2002	830
February 6, 2002	835	May 7, 2002	869	August 6, 2002	534	November 6, 2002	835
February 7, 2002	862	May 8, 2002	868	August 7, 2002	706	November 7, 2002	762
February 8, 2002	922	May 9, 2002	799	August 8, 2002	867	November 8, 2002	768
February 9, 2002	871	May 10, 2002	773	August 9, 2002	774	November 9, 2002	752
February 10, 2002	830	May 11, 2002	860	August 10, 2002	811	November 10, 2002	746
February 11, 2002	830	May 12, 2002	849	August 11, 2002	820	November 11, 2002	737
February 12, 2002	895	May 13, 2002	806	August 12, 2002	822	November 12, 2002	789
February 13, 2002	881	May 14, 2002	849	August 13, 2002	830	November 13, 2002	805
February 14, 2002	763	May 15, 2002	802	August 14, 2002	853	November 14, 2002	780
February 15, 2002	667	May 16, 2002	848	August 15, 2002	859	November 15, 2002	728
February 16, 2002	854	May 17, 2002	871	August 16, 2002	858	November 16, 2002	574
February 17, 2002	914	May 18, 2002	874	August 17, 2002	866	November 17, 2002	down
February 18, 2002	905	May 19, 2002	863	August 18, 2002	865	November 18, 2002	126
February 19, 2002	902	May 20, 2002	879	August 19, 2002	853	November 19, 2002	219
February 20, 2002	905	May 21, 2002	841	August 20, 2002	849	November 20, 2002	426
February 21, 2002	902	May 22, 2002	752	August 21, 2002	848	November 21, 2002	470
February 22, 2002	907	May 23, 2002	879	August 22, 2002	836	November 22, 2002	556
February 23, 2002	907	May 24, 2002	868	August 23, 2002	739	November 23, 2002	875
February 24, 2002	907	May 25, 2002	7	August 24, 2002	833	November 24, 2002	924
February 25, 2002	902	May 26, 2002	down	August 25, 2002	812	November 25, 2002	910
February 26, 2002	895	May 27, 2002	795	August 26, 2002	808	November 26, 2002	968
February 27, 2002	893	May 28, 2002	865	August 27, 2002	809	November 27, 2002	650
February 28, 2002	893	May 29, 2002	875	August 28, 2002	833	November 28, 2002	855
March 1, 2002	893	May 30, 2002	871	August 29, 2002	844	November 29, 2002	844
March 2, 2002	907	May 31, 2002	849	August 30, 2002	829	November 30, 2002	874
March 3, 2002	857	June 1, 2002	768	August 31, 2002	825	December 1, 2002	862
March 4, 2002	890	June 2, 2002	611	September 1, 2002	823	December 2, 2002	875
March 5, 2002	876	June 3, 2002	724	September 2, 2002	830	December 3, 2002	877
March 6, 2002	905	June 4, 2002	660	September 3, 2002	828	December 4, 2002	882

Table No. 2-c LIME PRODUCTION - 2002

								Highest Production Days		
								11/26		
	Lime Mud =		278,910	Tons / yr						
	Lime as CaO =		111,564	Tons / yr						
	Lime			Lime		Lime			Lime	
1Q2002	mud, TPD		2Q2002	mud, TPD	3Q2002	mud, TPD		4Q2002	mud, TPD	
March 7, 2002	866		June 5, 2002	896	September 4, 2002	801		December 5, 2002	886	
March 8, 2002	850		June 6, 2002	918	September 5, 2002	820		December 6, 2002	883	
March 9, 2002	890		June 7, 2002	911	September 6, 2002	829		December 7, 2002	882	
March 10, 2002	886		June 8, 2002	897	September 7, 2002	838		December 8, 2002	879	
March 11, 2002	826		June 9, 2002	913	September 8, 2002	837		December 9, 2002	881	
March 12, 2002	845		June 10, 2002	917	September 9, 2002	521		December 10, 2002	880	
March 13, 2002	864		June 11, 2002	909	September 10, 2002	154		December 11, 2002	858	
March 14, 2002	881		June 12, 2002	878	September 11, 2002	761		December 12, 2002	687	
March 15, 2002	886		June 13, 2002	896	September 12, 2002	872		December 13, 2002	878	
March 16, 2002	898		June 14, 2002	903	September 13, 2002	821		December 14, 2002	882	
March 17, 2002	905		June 15, 2002	916	September 14, 2002	903		December 15, 2002	883	
March 18, 2002	902		June 16, 2002	917	September 15, 2002	879		December 16, 2002	884	
March 19, 2002	905		June 17, 2002	922	September 16, 2002	869		December 17, 2002	883	
March 20, 2002	857		June 18, 2002	897	September 17, 2002	868		December 18, 2002	882	
March 21, 2002	847		June 19, 2002	788	September 18, 2002	859		December 19, 2002	831	
March 22, 2002	906		June 20, 2002	875	September 19, 2002	837		December 20, 2002	870	
March 23, 2002	904		June 21, 2002	846	September 20, 2002	898		December 21, 2002	878	
March 24, 2002	905		June 22, 2002	863	September 21, 2002	882		December 22, 2002	880	
March 25, 2002	906		June 23, 2002	860	September 22, 2002	881		December 23, 2002	882	
March 26, 2002	905		June 24, 2002	748	September 23, 2002	896		December 24, 2002	871	
March 27, 2002	885		June 25, 2002	318	September 24, 2002	903		December 25, 2002	879	
March 28, 2002	870		June 26, 2002	809	September 25, 2002	909		December 26, 2002	879	
March 29, 2002	880		June 27, 2002	813	September 26, 2002	921		December 27, 2002	888	
March 30, 2002	860		June 28, 2002	844	September 27, 2002	880		December 28, 2002	860	
March 31, 2002	865		June 29, 2002	843	September 28, 2002	877		December 29, 2002	878	
			June 30, 2002	842	September 29, 2002	909		December 30, 2002	868	
					September 30, 2002	908		December 31, 2002	801	
Quarterly Total	72383			62305		74234			69989	

Table No. 2-b Lime Kiln Production - 2003

						Highest Production Days	
						1/27 to 1/28	
		Lime Mud =	281056	Tons			
		Lime as CaO =	112423	Tons			
1Q2003	mud, TPD	2Q2003	mud, TPD	3Q2003	mud, TPD	4Q2003	mud, TPD
January 1, 2003	846	April 1, 2003	903	July 1, 2003	826	October 1, 2003	897
January 2, 2003	871	April 2, 2003	960	July 2, 2003	863	October 2, 2003	800
January 3, 2003	877	April 3, 2003	937	July 3, 2003	563	October 3, 2003	871
January 4, 2003	874	April 4, 2003	729	July 4, 2003	758	October 4, 2003	860
January 5, 2003	875	April 5, 2003	903	July 5, 2003	773	October 5, 2003	878
January 6, 2003	846	April 6, 2003	918	July 6, 2003	773	October 6, 2003	881
January 7, 2003	904	April 7, 2003	914	July 7, 2003	526	October 7, 2003	880
January 8, 2003	893	April 8, 2003	841	July 8, 2003	740	October 8, 2003	879
January 9, 2003	795	April 9, 2003	903	July 9, 2003	826	October 9, 2003	880
January 10, 2003	918	April 10, 2003	887	July 10, 2003	863	October 10, 2003	857
January 11, 2003	918	April 11, 2003	793	July 11, 2003	865	October 11, 2003	859
January 12, 2003	914	April 12, 2003	783	July 12, 2003	869	October 12, 2003	869
January 13, 2003	918	April 13, 2003	848	July 13, 2003	868	October 13, 2003	755
January 14, 2003	922	April 14, 2003	884	July 14, 2003	881	October 14, 2003	879
January 15, 2003	908	April 15, 2003	801	July 15, 2003	880	October 15, 2003	884
January 16, 2003	929	April 16, 2003	804	July 16, 2003	869	October 16, 2003	899
January 17, 2003	933	April 17, 2003	889	July 17, 2003	843	October 17, 2003	899
January 18, 2003	939	April 18, 2003	854	July 18, 2003	868	October 18, 2003	858
January 19, 2003	940	April 19, 2003	765	July 19, 2003	872	October 19, 2003	735
January 20, 2003	933	April 20, 2003	845	July 20, 2003	874	October 20, 2003	883
January 21, 2003	887	April 21, 2003	812	July 21, 2003	875	October 21, 2003	781
January 22, 2003	937	April 22, 2003	757	July 22, 2003	860	October 22, 2003	695
January 23, 2003	954	April 23, 2003	718	July 23, 2003	881	October 23, 2003	660
January 24, 2003	958	April 24, 2003	760	July 24, 2003	873	October 24, 2003	885
January 25, 2003	924	April 25, 2003	731	July 25, 2003	871	October 25, 2003	869
January 26, 2003	958	April 26, 2003	882	July 26, 2003	865	October 26, 2003	885
January 27, 2003	969	April 27, 2003	913	July 27, 2003	841	October 27, 2003	911
January 28, 2003	960	April 28, 2003	908	July 28, 2003	849	October 28, 2003	867
January 29, 2003	634	April 29, 2003	907	July 29, 2003	840	October 29, 2003	821
January 30, 2003	876	April 30, 2003	851	July 30, 2003	849	October 30, 2003	592
January 31, 2003	680	May 1, 2003	477	July 31, 2003	814	October 31, 2003	717
February 1, 2003	926	May 2, 2003	896	August 1, 2003	135	November 1, 2003	809
February 2, 2003	924	May 3, 2003	900	August 2, 2003	853	November 2, 2003	856
February 3, 2003	926	May 4, 2003	903	August 3, 2003	865	November 3, 2003	753
February 4, 2003	921	May 5, 2003	down	August 4, 2003	792	November 4, 2003	218
February 5, 2003	889	May 6, 2003	down	August 5, 2003	745	November 5, 2003	360
February 6, 2003	915	May 7, 2003	down	August 6, 2003	810	November 6, 2003	777
February 7, 2003	896	May 8, 2003	down	August 7, 2003	842	November 7, 2003	833
February 8, 2003	939	May 9, 2003	down	August 8, 2003	842	November 8, 2003	826
February 9, 2003	905	May 10, 2003	down	August 9, 2003	834	November 9, 2003	826
February 10, 2003	930	May 11, 2003	down	August 10, 2003	821	November 10, 2003	827
February 11, 2003	934	May 12, 2003	down	August 11, 2003	844	November 11, 2003	775
February 12, 2003	935	May 13, 2003	down	August 12, 2003	723	November 12, 2003	837
February 13, 2003	904	May 14, 2003	down	August 13, 2003	587	November 13, 2003	804
February 14, 2003	852	May 15, 2003	down	August 14, 2003	840	November 14, 2003	730
February 15, 2003	926	May 16, 2003	down	August 15, 2003	802	November 15, 2003	754
February 16, 2003	941	May 17, 2003	down	August 16, 2003	764	November 16, 2003	801
February 17, 2003	940	May 18, 2003	down	August 17, 2003	701	November 17, 2003	831
February 18, 2003	935	May 19, 2003	down	August 18, 2003	335	November 18, 2003	827
February 19, 2003	934	May 20, 2003	down	August 19, 2003	553	November 19, 2003	684
February 20, 2003	894	May 21, 2003	435	August 20, 2003	822	November 20, 2003	796
February 21, 2003	816	May 22, 2003	291	August 21, 2003	855	November 21, 2003	727
February 22, 2003	937	May 23, 2003	894	August 22, 2003	866	November 22, 2003	779
February 23, 2003	930	May 24, 2003	896	August 23, 2003	795	November 23, 2003	808
February 24, 2003	938	May 25, 2003	805	August 24, 2003	736	November 24, 2003	778
February 25, 2003	884	May 26, 2003	769	August 25, 2003	801	November 25, 2003	817
February 26, 2003	910	May 27, 2003	855	August 26, 2003	828	November 26, 2003	250
February 27, 2003	908	May 28, 2003	887	August 27, 2003	851	November 27, 2003	459
February 28, 2003	902	May 29, 2003	891	August 28, 2003	861	November 28, 2003	470
March 1, 2003	934	May 30, 2003	814	August 29, 2003	865	November 29, 2003	523
March 2, 2003	898	May 31, 2003	739	August 30, 2003	853	November 30, 2003	677
March 3, 2003	916	June 1, 2003	625	August 31, 2003	782	December 1, 2003	571
March 4, 2003	923	June 2, 2003	139	September 1, 2003	780	December 2, 2003	659

Table No. 2-b Lime Kiln Production - 2003

						Highest Production Days	
						1/27 to 1/28	
		Lime Mud =	281056	Tons			
		Lime as CaO =	112423	Tons			
1Q2003	mud, TPD	2Q2003	mud, TPD	3Q2003	mud, TPD	4Q2003	mud, TPD
March 5, 2003	923	June 3, 2003	752	September 2, 2003	780	December 3, 2003	723
March 6, 2003	923	June 4, 2003	861	September 3, 2003	825	December 4, 2003	810
March 7, 2003	890	June 5, 2003	873	September 4, 2003	820	December 5, 2003	843
March 8, 2003	812	June 6, 2003	725	September 5, 2003	752	December 6, 2003	787
March 9, 2003	860	June 7, 2003	535	September 6, 2003	865	December 7, 2003	112
March 10, 2003	907	June 8, 2003	779	September 7, 2003	880	December 8, 2003	496
March 11, 2003	864	June 9, 2003	857	September 8, 2003	898	December 9, 2003	339
March 12, 2003	815	June 10, 2003	884	September 9, 2003	953	December 10, 2003	200
March 13, 2003	869	June 11, 2003	807	September 10, 2003	918	December 11, 2003	459
March 14, 2003	870	June 12, 2003	717	September 11, 2003	888	December 12, 2003	235
March 15, 2003	875	June 13, 2003	718	September 12, 2003	740	December 13, 2003	831
March 16, 2003	750	June 14, 2003	806	September 13, 2003	857	December 14, 2003	845
March 17, 2003	861	June 15, 2003	367	September 14, 2003	898	December 15, 2003	826
March 18, 2003	799	June 16, 2003	26	September 15, 2003	889	December 16, 2003	756
March 19, 2003	762	June 17, 2003	32	September 16, 2003	876	December 17, 2003	822
March 20, 2003	862	June 18, 2003	745	September 17, 2003	695	December 18, 2003	829
March 21, 2003	812	June 19, 2003	836	September 18, 2003	733	December 19, 2003	817
March 22, 2003	881	June 20, 2003	839	September 19, 2003	770	December 20, 2003	842
March 23, 2003	926	June 21, 2003	845	September 20, 2003	832	December 21, 2003	849
March 24, 2003	882	June 22, 2003	832	September 21, 2003	826	December 22, 2003	859
March 25, 2003	920	June 23, 2003	822	September 22, 2003	827	December 23, 2003	812
March 26, 2003	924	June 24, 2003	811	September 23, 2003	729	December 24, 2003	828
March 27, 2003	913	June 25, 2003	805	September 24, 2003	544	December 25, 2003	808
March 28, 2003	904	June 26, 2003	787	September 25, 2003	781	December 26, 2003	852
March 29, 2003	913	June 27, 2003	814	September 26, 2003	858	December 27, 2003	864
March 30, 2003	888	June 28, 2003	741	September 27, 2003	824	December 28, 2003	869
March 31, 2003	687	June 29, 2003	813	September 28, 2003	832	December 29, 2003	839
		June 30, 2003	816	September 29, 2003	878	December 30, 2003	798
				September 30, 2003	890	December 31, 2003	801
Quarterly Total	80243		57861	0	73876	0	69077

Table No. 2-a LIME KILN PRODUCTION - 2004

Total mud in 2004 = 279328 tons

Total lime in 2004 111731 Tons CaO

Highest Production Days

3/3

4/18 to 4/20

4/25

1Q2004	Lime Mud TPD	2Q2004	Lime Mud TPD	3Q2004	Lime Mud TPD	4Q2004	Lime Mud TPD
January 1, 2004	837	April 1, 2004	890	July 1, 2004	871	October 1, 2004	917
January 2, 2004	854	April 2, 2004	847	July 2, 2004	908	October 2, 2004	722
January 3, 2004	840	April 3, 2004	893	July 3, 2004	839	October 3, 2004	797
January 4, 2004	853	April 4, 2004	865	July 4, 2004	845	October 4, 2004	854
January 5, 2004	852	April 5, 2004	741	July 5, 2004	867	October 5, 2004	869
January 6, 2004	875	April 6, 2004	801	July 6, 2004	907	October 6, 2004	874
January 7, 2004	829	April 7, 2004	888	July 7, 2004	920	October 7, 2004	869
January 8, 2004	857	April 8, 2004	862	July 8, 2004	910	October 8, 2004	881
January 9, 2004	592	April 9, 2004	913	July 9, 2004	780	October 9, 2004	881
January 10, 2004	785	April 10, 2004	898	July 10, 2004	883	October 10, 2004	883
January 11, 2004	857	April 11, 2004	909	July 11, 2004	889	October 11, 2004	883
January 12, 2004	825	April 12, 2004	898	July 12, 2004	920	October 12, 2004	883
January 13, 2004	298	April 13, 2004	896	July 13, 2004	515	October 13, 2004	883
January 14, 2004	542	April 14, 2004	942	July 14, 2004	869	October 14, 2004	782
January 15, 2004	722	April 15, 2004	813	July 15, 2004	899	October 15, 2004	883
January 16, 2004	641	April 16, 2004	889	July 16, 2004	847	October 16, 2004	883
January 17, 2004	872	April 17, 2004	959	July 17, 2004	776	October 17, 2004	883
January 18, 2004	869	April 18, 2004	972	July 18, 2004	779	October 18, 2004	883
January 19, 2004	802	April 19, 2004	965	July 19, 2004	863	October 19, 2004	883
January 20, 2004	847	April 20, 2004	962	July 20, 2004	846	October 20, 2004	895
January 21, 2004	845	April 21, 2004	956	July 21, 2004	801	October 21, 2004	787
January 22, 2004	856	April 22, 2004	983	July 22, 2004	908	October 22, 2004	890
January 23, 2004	854	April 23, 2004	939	July 23, 2004	899	October 23, 2004	902
January 24, 2004	860	April 24, 2004	931	July 24, 2004	733	October 24, 2004	900
January 25, 2004	856	April 25, 2004	961	July 25, 2004	157	October 25, 2004	900
January 26, 2004	880	April 26, 2004	957	July 26, 2004	139	October 26, 2004	907
January 27, 2004	886	April 27, 2004	470	July 27, 2004	814	October 27, 2004	902
January 28, 2004	868	April 28, 2004	Down	July 28, 2004	897	October 28, 2004	910
January 29, 2004	145	April 29, 2004	Down	July 29, 2004	898	October 29, 2004	910
January 30, 2004	807	April 30, 2004	Down	July 30, 2004	920	October 30, 2004	912
January 31, 2004	839	May 1, 2004	Down	July 31, 2004	903	October 31, 2004	919
February 1, 2004	872	May 2, 2004	Down	August 1, 2004	878	November 1, 2004	929
February 2, 2004	875	May 3, 2004	Down	August 2, 2004	862	November 2, 2004	907
February 3, 2004	845	May 4, 2004	Down	August 3, 2004	925	November 3, 2004	905
February 4, 2004	831	May 5, 2004	Down	August 4, 2004	909	November 4, 2004	900
February 5, 2004	833	May 6, 2004	Down	August 5, 2004	505	November 5, 2004	859
February 6, 2004	813	May 7, 2004	Down	August 6, 2004	774	November 6, 2004	905
February 7, 2004	843	May 8, 2004	Down	August 7, 2004	891	November 7, 2004	881
February 8, 2004	878	May 9, 2004	Down	August 8, 2004	838	November 8, 2004	881
February 9, 2004	850	May 10, 2004	Down	August 9, 2004	890	November 9, 2004	852
February 10, 2004	841	May 11, 2004	Down	August 10, 2004	823	November 10, 2004	864
February 11, 2004	864	May 12, 2004	Down	August 11, 2004	877	November 11, 2004	864
February 12, 2004	831	May 13, 2004	Down	August 12, 2004	869	November 12, 2004	864
February 13, 2004	508	May 14, 2004	Down	August 13, 2004	787	November 13, 2004	859
February 14, 2004	863	May 15, 2004	Down	August 14, 2004	885	November 14, 2004	799
February 15, 2004	884	May 16, 2004	Down	August 15, 2004	839	November 15, 2004	838
February 16, 2004	902	May 17, 2004	Down	August 16, 2004	603	November 16, 2004	893
February 17, 2004	913	May 18, 2004	Down	August 17, 2004	702	November 17, 2004	905
February 18, 2004	904	May 19, 2004	Down	August 18, 2004	885	November 18, 2004	542
February 19, 2004	275	May 20, 2004	Down	August 19, 2004	949	November 19, 2004	900
February 20, 2004	726	May 21, 2004	427	August 20, 2004	851	November 20, 2004	905
February 21, 2004	803	May 22, 2004	538	August 21, 2004	677	November 21, 2004	910
February 22, 2004	855	May 23, 2004	748	August 22, 2004	859	November 22, 2004	912
February 23, 2004	874	May 24, 2004	694	August 23, 2004	908	November 23, 2004	914
February 24, 2004	871	May 25, 2004	637	August 24, 2004	843	November 24, 2004	917
February 25, 2004	880	May 26, 2004	717	August 25, 2004	798	November 25, 2004	914
February 26, 2004	916	May 27, 2004	705	August 26, 2004	830	November 26, 2004	917
February 27, 2004	931	May 28, 2004	804	August 27, 2004	888	November 27, 2004	922
February 28, 2004	898	May 29, 2004	809	August 28, 2004	884	November 28, 2004	862
February 29, 2004	917	May 30, 2004	795	August 29, 2004	861	November 29, 2004	919
March 1, 2004	940	May 31, 2004	792	August 30, 2004	870	November 30, 2004	893
March 2, 2004	947	June 1, 2004	831	August 31, 2004	820	December 1, 2004	917
March 3, 2004	971	June 2, 2004	789	September 1, 2004	829	December 2, 2004	910
March 4, 2004	952	June 3, 2004	725	September 2, 2004	868	December 3, 2004	754
March 5, 2004	902	June 4, 2004	809	September 3, 2004	921	December 4, 2004	638
March 6, 2004	954	June 5, 2004	792	September 4, 2004	939	December 5, 2004	768
March 7, 2004	928	June 6, 2004	797	September 5, 2004	587	December 6, 2004	922

Table No. 2-a LIME KILN PRODUCTION - 2004

							Highest Production Days	
							3/3	
							4/18 to 4/20	
		Total mud in 2004 =	279328	tons			4/25	
		Total lime in 2004	111731	Tons CaO				
	Lime Mud		Lime Mud		Lime Mud			Lime Mud
1Q2004	TPD	2Q2004	TPD	3Q2004	TPD	4Q2004		TPD
March 8, 2004	933	June 7, 2004	801	September 6, 2004	269	December 7, 2004		down
March 9, 2004	910	June 8, 2004	415	September 7, 2004	887	December 8, 2004		down
March 10, 2004	912	June 9, 2004	down	September 8, 2004	959	December 9, 2004		down
March 11, 2004	916	June 10, 2004	283	September 9, 2004	900	December 10, 2004		535
March 12, 2004	865	June 11, 2004	793	September 10, 2004	857	December 11, 2004		782
March 13, 2004	846	June 12, 2004	824	September 11, 2004	903	December 12, 2004		809
March 14, 2004	797	June 13, 2004	829	September 12, 2004	930	December 13, 2004		850
March 15, 2004	844	June 14, 2004	819	September 13, 2004	895	December 14, 2004		874
March 16, 2004	837	June 15, 2004	739	September 14, 2004	922	December 15, 2004		751
March 17, 2004	688	June 16, 2004	821	September 15, 2004	613	December 16, 2004		655
March 18, 2004	902	June 17, 2004	824	September 16, 2004	888	December 17, 2004		766
March 19, 2004	904	June 18, 2004	832	September 17, 2004	908	December 18, 2004		809
March 20, 2004	911	June 19, 2004	786	September 18, 2004	872	December 19, 2004		838
March 21, 2004	922	June 20, 2004	755	September 19, 2004	834	December 20, 2004		814
March 22, 2004	902	June 21, 2004	509	September 20, 2004	840	December 21, 2004		773
March 23, 2004	907	June 22, 2004	737	September 21, 2004	833	December 22, 2004		857
March 24, 2004	911	June 23, 2004	836	September 22, 2004	854	December 23, 2004		845
March 25, 2004	910	June 24, 2004	827	September 23, 2004	842	December 24, 2004		840
March 26, 2004	820	June 25, 2004	834	September 24, 2004	794	December 25, 2004		737
March 27, 2004	877	June 26, 2004	837	September 25, 2004	521	December 26, 2004		833
March 28, 2004	875	June 27, 2004	816	September 26, 2004	down	December 27, 2004		852
March 29, 2004	908	June 28, 2004	866	September 27, 2004	down	December 28, 2004		862
March 30, 2004	890	June 29, 2004	902	September 28, 2004	557	December 29, 2004		790
March 31, 2004	896	June 30, 2004	738	September 29, 2004	869	December 30, 2004		893
				September 30, 2004	926	December 31, 2004		898
Quarterly Total	75918		53786		73597			**76027**