UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

OCT 15 2003
RECEIVED

Ms. Myra J. Carpenter
Environmental Superintendent
Georgia-Pacific Corporation
P. O. Box 919
Palatka, FL 32178-0919

NOV 04 2003
STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

Dear Ms. Carpenter:

This is in response to your letter dated August 4, 2003 to Mr. John Gay of the Florida Department of Environmental Protection that requested approval for an alternative to Method 308 for measuring methanol as required under 40 CFR Section 63.457(b)(5)(i). Because the Office of Air Quality Planning and Standards rather than the State of Florida is the delegated authority for approving major alternatives to compliance test methods, we are responding to your request.

You are proposing to use NCASI Method CI/SG/PULP-94.03 developed by the National Council for Air and Stream Improvement (NCASI) to measure methanol in air emission streams from pulp mills. This method is a modification of the NCASI Method CI/SG/PULP-94.02, "Chilled Impinger /Silica Gel Tube Test Method at Pulp Mill Sources for Methanol, Acetone, Acetaldehyde, Methyl Ethyl Ketone and Formaldehyde." The EPA notified the NCASI by letter dated August 17, 1997, that NCASI Method CI/SG/PULP-94.02 met Method 301 criteria for measuring methanol in pulp mill air emission streams and was an acceptable alternative to Method 308 for this purpose. You are proposing to modify NCASI Method CI/SG/PULP-94.02 by analyzing only the chilled impinger samples and not the silica gel adsorbent tubes. This modified method, NCASI Method CI/SG/PULP-94.03, would only be used to measure methanol and would not apply to any of the other HAP's that can be measured by NCASI Method CI/SG/PULP-94.02.

Along with your request, you submitted some supporting data developed by the NCASI that show that if you omit the analysis of the silica gel cartridges, the method will still meet the criteria in Method 301 for a valid method for measuring methanol. We have reviewed these data and we agree with your conclusion that if the analysis of the silica gel adsorbent cartridges is omitted, the NCASI Method CI/SG/PULP-94.02. will meet Method 301 criteria for measuring methanol air emissions from pulp mills. Based on the supporting data developed by the NCASI

and the similarity of the air streams for which you propose to use the method to the air streams from which the NCASI collected their supporting data, we are approving your request for use of this alternative test method at your facility in Palatka, Florida.

If you need further assistance, please contact Gary McAlister at (919) 541-1062.

Sincerely,

Conniesue B. Oldham

Conniesue B. Oldham, PhD., Group Leader
Source Measurement Technology Group

Enclosures

cc: Ms. Rita Felton-Smith, Florida Dept. of Environmental Protection, Licensing Division
Mr. John Gay, Florida Dept. of Environmental Protection, Licensing Division
Mr. Lee Page, EPA Region 4
Mr. Stephen Shedd, EPA/OAQPS/ESD
Dr. Vipin Varma, NCASI