



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 01 2000

4APT-ARB

MEMORANDUM

SUBJECT: Jefferson Smurfit Request for an Alternative Test Method

FROM: R. Douglas Neeley, Chief *Paul Neeley*
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division

TO: J. David Mobley, Acting Director
Emissions Monitoring and Analysis Division

We are in receipt of an alternative test method request from the Jefferson Smurfit Corporation, Fernandina Beach Mill, Fernandina Beach, Florida. The source is subject to the Pulp and Paper NESHAP, 40 C.F.R. 63, Subpart S, and has submitted a request to use the NCASI direct injection test procedures to analyze for acetaldehyde, methanol, propionaldehyde, and methyl ethyl ketone. Although EPA has concluded that the NCASI test method meets the Method 301 validation criteria for measuring the four hazardous air pollutants in condensate streams, each specific source must make its own alternative test method request.

As stated in Section 7-121 of the Delegation Manual, the Administrator has delegated the authority to approve or disapprove alternatives to test methods to the Director of the Office of Air Quality Planning and Standards, and the redelegation authority to the Branch Chief level or equivalent. Therefore, attached for your attention is the Jefferson Smurfit request for an alternative test method.

Your contacts for this request are Lee Page at the EPA Region 4, (404) 562-9131, Mike Harley, P.E., Florida Department of Environmental Protection, (850) 921-9511, and Mike Holden, Technical Director, Jefferson Smurfit Corporation, (904) 277-5735.

Attachment

cc: Howard L. Rhodes, Director, FDEP
Mike Harley, P.E., DEE, FDEP
Mike Holden, Jefferson Smurfit