



Florida Department of Environmental Protection

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May 15, 2012

Sent by Electronic mail – Received Receipt Requested

Ron Stewart, PE, Executive Director
rstewart@fppaea.org
Florida Pulp and Paper Association Environmental Affairs, Inc.
1238 East Kennedy Boulevard, Unit 803S
Tampa, FL 33602-3570

Re: Update to Alternate Method Test

Dear Mr. Stewart:

This replaces our previous letter on alternate method tests dated May 8, 2012.

The Department has received your request dated April 26, 2012 and e-mail request dated May 9, 2012 for approval to use proposed EPA Test Method 16C for the measurement of total reduced sulfur (TRS) by your member pulp and paper facilities.

In a letter dated March 24, 2010, USEPA Research Triangle Park responded to a request from the Georgia Pacific Facility in Cedar Springs Georgia to use an alternate test method to EPA Method 16A where titration analysis is replaced by a sulfur dioxide analyzer for the determination of TRS emissions from sources subject to the requirements of 40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills. The EPA stated that the method proposed by Georgia Pacific was identical to a proposed new method, EPA Method 16C. EPA indicated that the draft Method 16C could be used at any facility subject to 40 CFR 60, Subpart BB in addition to EPA Methods 16, 16A or 16B. This document can be found at <http://www.epa.gov/ttn/emc/approalt/ALT071.pdf> and is identified as ALT-071 “Approval of Modifications of Method 16A for Kraft Pulp Mills and Petroleum Refineries”.

In a telephone conversation with Mr. Foston Curtis of the USEPA, Office of Air Quality Planning and Standards, Air Quality Assessment Division, Research Triangle Park on May 10, 2012, he stated that the use of proposed EPA Method 16C could be approved on a case-by-case basis for other federal rule applications where TRS is measured by EPA Methods 16, 16A, or 16B. In the case of sources subject to only state regulations, he stated that it would be up to the state’s discretion as to the approval of the use of proposed EPA Method 16C.

Based on this information, the Department has no objection to the use of proposed EPA Method 16C for demonstrating compliance with:

- 40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills, or
- Rule 62-296.404, Florida Administrative Code – Kraft (Sulfate) Pulp Mills and Tall Oil Plants

Should a member facility wish to use proposed EPA Method 16C to demonstrate compliance with a TRS limit *specified in different federal regulation*, prior approval must be granted by EPA. We will assist in obtaining this approval.

ALTERNATE TEST METHOD

When you notify the Compliance Authority of the scheduled test, please identify the alternative test method and provide a copy of this letter.

Should you have any questions or need additional assistance, please do not hesitate to call Edward Svec at 850/717-9031 or contact him at ed.svec@dep.state.fl.us.

Sincerely,
(Electronic Signature)

JFK/sa/ejs

cc: Khalid AlNahdy, Administrator, Northeast District Office: Khalid.AlNahdy@dep.state.fl.us

Rick Bradburn, Administrator, Northwest District Office: Rick.Bradburn@dep.state.fl.us