



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

DEC 11 2000

Mr. Mike Holden
Technical Director
Jefferson Smurfit Corporation
North 8th Street
Fernandina Beach, Florida 32034

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS


Dear Mr. Holden:

This is in response to the letter dated June 15, 2000, from Richard N. Bowman, Environmental Manager, Jefferson Smurfit Corporation, Fernandina Beach Mill, which requests, among other items, the approval of an alternative test method for measuring the hazardous air pollutant (HAP) content of condensate streams at the Fernandina Beach Mill. The method that you are proposing would be an alternative to the method required by 40 CFR Part 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, Section 63.457. Mr. R. Douglas Neeley has already responded to your request for an alternative compliance plan for condensates. Mr. Neeley forwarded your request for the alternative test method to me in a memorandum dated November 1, 2000.

The Fernandina Beach Mill is proposing to use a procedure titled, 'Selected HAPS in Condensates by GC/FID,' developed by the National Council for Air and Stream Improvement (NCASI) to analyze for acetaldehyde, methanol, propionaldehyde, and methyl ethyl ketone in the condensate streams. I notified the NCASI by letter dated September 22, 2000, that this test method met Method 301 criteria for measuring these four HAPS in condensate streams, provided that the tester uses the appropriate correction factor. A copy of this letter is enclosed. Based on the data submitted by the NCASI and the similarity of the source at which you propose to use the method to the source at which the NCASI collected their supporting data, we are approving your request for use of this alternative test method.

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

Sincerely,


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

Enclosures