



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

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4APT-ARB

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

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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To	From
RITA FELTON - SMITH	LEE PAGE
Dept./Agency	Phone #
Fax #	Ex #
904-448-4363	
NSN 7540-01-317-7966	5099-101

GENERAL SERVICES ADMINISTRATION

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 approval of an alternative method for demonstrating compliance with certain requirements of the Pulp and Paper MACT standard in 40 C.F.R. 63, Subpart S. More specifically, the Fernandina Beach Mill has installed a UNOX biological treatment system to control hazardous air pollutant (HAP) emissions in condensates as required in 63.446 and 63.453. Because the UNOX system used by the mill is different from the "open" and "closed" biological systems as described in Subpart S, and the technical amendment to Subpart S, dated September 16, 1998, an alternative method of demonstrating compliance is desirable. Our comments on your proposed alternative compliance plan for condensates follow.

General Comments:

The overall compliance plan for the Fernandina Beach mill's UNOX biological system corresponds to the standards for pulping process condensates in Section 63.446(e)(2)(ii) and the test method requirements in 63.457(l)(4) of the January 25, 2000, proposed rule amendment to Subpart S (please note that the alternative plan request incorrectly referenced 63.457(g)(4) instead of 63.457(l)(4)). The compliance plan consists of direct measurement of vent gas HAP mass; demonstration that the required lbs. HAP per ton of production or percent HAP reduction is achieved by the UNOX process; and selection of compliance operating parameters and establishment of the range of values for those parameters within which the required HAP removal has been demonstrated to have been achieved.

Regarding continuous compliance monitoring, the plan proposes vent gas purity and oxygen feed rate as the monitoring parameters to demonstrate compliance, and mentions, in various places throughout the plan, daily monitoring of parameters. Since daily parameter monitoring does not constitute continuous monitoring, the plan should clarify the monitoring frequency of surrogate parameters which will meet the continuous monitoring requirements. This

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clarification should be provided to your permitting authority as well as to my attention, at your convenience, by way of separate letter or as a part of your initial performance test report. Also, the proposed parameters, however appropriate, can only be approved when the documentation showing compliance is submitted.

With the exception of issues relating to the NCASI test method and the proposed averaging time (described below), we concur that your overall plan for demonstrating compliance with the condensate requirements in 63.446 and 63.453 is acceptable.

NCASI Test Method:

The Fernandina Beach Mill is proposing to use the NCASI direct injection test procedures to analyze for acetaldehyde, methanol, propionaldehyde, and methyl ethyl ketone. By letter dated September 22, 2000, from J. David Mobley, Acting Director, Emissions, Monitoring and Analysis Division, Environmental Protection Agency (EPA) Office of Air Quality Planning and Standards to Dr. Mary Ann Gunsheski, NCASI (enclosed), EPA responded to the NCASI report entitled "EPA Method 301 Validation Report of the NCASI Method 'Selected HAPS in Condensates by GC/FID.'" EPA concluded that the NCASI test method met Method 301 criteria for measuring the four HAPS in condensate streams, provided that the tester use the appropriate correction factor. However, each specific source must make its own alternative test method request. The authority to approve such a request is retained by EPA at Mr. Mobley's Division level, and therefore we have forwarded your request accordingly.

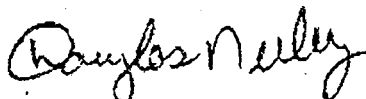
Averaging Time:

The Fernandina Mill is proposing to use a 15-day averaging time for demonstrating compliance with the condensate requirements and has submitted NCASI generated data to justify this averaging time period. Condensate testing averaging time has been an important issue with the pulp & paper industry and was the focus of a letter dated November 5, 1999, from Winston Smith, Director, EPA Region 4 Air Pesticides and Toxics Management Division, to Ronald Gore, Chief, Air Division, Alabama Department of Environmental Management (enclosed). This letter explains that the burden is on the mill to demonstrate what compliance averaging time is appropriate for that particular mill, and that *mill specific data* is required for the demonstration. The NCASI data can be used to supplement your demonstration, but a correlation would have to be made between the NCASI data and the Fernandina Mill condensate data to show that the NCASI data is truly representative data. Therefore, Fernandina Beach Mill condensate data is needed to justify the proposed 15-day averaging time and should be forwarded to the mill's permitting authority for approval.

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If further assistance is needed, please contact Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,



R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

Enclosures

cc: Howard L. Rhodes, Director, FDEP