



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 9 2005

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Alan E. Stinchfield
Environmental Technical Support
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Mr. Stinchfield:

I am writing in response to your letter dated August 29, 2005, which included several alternative method requests. You are requesting the alternative methods on behalf of Georgia-Pacific (GP) facilities in the following cities:

Ahoskie, NC	Grenada, MS	Prosperity, SC
Bay Springs, MS	Hawthorne, FL	Roxboro, NC
Big Island, VA	Holly Hill, SC	Russellville, SC (2)
Bon Weir, TX	Hosford, FL	Savannah, GA (2)
Brookneal, VA	Jarratt, VA	Skippers, VA
Camas, WA	Logansport, LA	Talladega, AL
Cedar Springs, GA	Louisville, MS	Taylorsville, MS
Claxton, GA	Madison, GA	Toledo, OR
Cleveland, TX	Monticello, MS (3)	Tylertown, MS
Crossett, AR (2)	Mt. Hope, WV	Urania, LA
Dudley, NC	Muskogee, OK	Vienna, GA
El Dorado, AR	Old Town, ME	Warm Springs, GA
Emporia, VA	Palatka, FL	Warrenton, GA
Eugene, OR	Peterman, AL	Wauna, OR
Fayette, AL	Phillips, WI	Whiteville, NC
Fordyce, AR	Philomath, OR	
Gaylord, MI	Port Hudson, LA	
Green Bay, WI		

Multiple GP facilities are located in several of the cities listed above: Plywood and Pulp and Paper facilities in Crossett, AR; MDF, Plywood, and Pulp and Paper facilities in Monticello, MS; Particleboard and Plywood facilities in Russellville, SC; and Plywood and Pulp and Paper facilities in Savannah, GA. All the listed facilities operate boilers subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD). The boilers must meet the standards in Subpart DDDDD for Particulate Matter (PM) or Total Select Metals (TSM),

Mercury (Hg), and Hydrogen Chloride (HCl) emissions. These facilities have chosen to comply with Subpart DDDDD by conducting a fuel analysis and comparing the results to the TSM, Hg and HCl standards. Table 6 of Subpart DDDDD lists the various methods allowed for fuel analysis, but you have requested methods not listed in Table 6 for your fuel analysis plans. You have requested approval to use test methods with lower analytical detection limits and better selectivity than those specified in Subpart DDDDD, Table 6.

Pursuant to 40 CFR Part 63, Section 63.7, the U.S. Environmental Protection Agency hereby approves your request to use the following methods at all the facilities listed above:

EPA Method 1631E (Hg measurement)
SW-846-6020 (total select metals measurement)
SW-846-5050 (HCl measurement)

Since individual laboratories following the same method will have different detection capabilities, the facilities should review the specific candidate laboratory's demonstrated detection limits to ensure that they are sufficient to conclusively determine that the boilers comply with the Subpart DDDDD emission limits.

If you have further questions on this matter, please contact Rima Howell at (919) 541-0443.

Sincerely,



Conniesue B. Oldham, Ph.D., Group Leader
Air Measurements & Quality Group