



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

August 10, 2023

Mr. David Phillips, Mill Manager  
International Paper, Columbus Mill  
4335 Carson Road  
Columbus, Mississippi 39701

Dear Mr. Phillips:

This letter is in response to your letter dated March 30, 2023, requesting an alternative monitoring procedure (AMP) for the Kraft pulping system located at the International Paper (IP) Columbus Mill (Mill) in Columbus, Mississippi. The Mill is subject to Title 40, Code of Federal Regulations (C.F.R.), Part 63, Subpart S - National Emission Standards for Hazardous Air Pollutants (NESHAPs) from the Pulp and Paper Industry (Subpart S). Based on the information you provided, your proposed AMP is approved. Details regarding the AMP and the basis for our determination are provided in the remainder of this letter.

The Mill, which includes a bleach plant and an oxygen delignification system, produces softwood pulp in a fiber production line using a digester. In addition to the production of fiber, turpentine, black liquor, and white liquor are also produced. Subpart S is applicable to the Mill because the Mill is a major source as defined in 40 C.F.R. § 63.2 and uses the Kraft process to produce pulp. Under 40 C.F.R. § 63.446(c)(3), the Mill is subject to the pulping process condensates mass collection requirement of 11.1 pounds of hazardous air pollutants per oven-dried ton of pulp and collects pulping process condensate streams resulting from condensation of vapors evolving from the digester, turpentine recovery, and weak liquor feed stages of the evaporator, high-volume low-concentration, and low-volume high-concentration systems. The condensate streams are combined and transported in a closed collection system to a steam stripper feed tank. Under 40 C.F.R. § 63.453(k), the Mill is required to perform visual observations of closed vent systems once every 30 days. Under 40 C.F.R. § 63.453(l), pulping process condensate closed collection systems must be visually inspected every 30 days.

### **AMP Request**

Under 40 C.F.R. § 63.453(m), you request to perform inspections *once during each calendar month*, with at least 14 days elapsed time between inspections. You note that the Mill experiences difficulties in implementing schedules which conform to the rule's requirements, especially when a large number of inspections are required. You also note that IP prefers to conduct inspections on weekdays when maintenance and inspection personnel are generally available, which eliminates the need of the Mill to schedule maintenance and inspection personnel on weekends. Specifically, you request to conduct inspections once during each calendar month, with an allowance of at least 14 days elapsed time between inspections.

To support your request, you included copies of the U.S. Environmental Protection Agency (EPA) approvals which allow facilities to use a similar alternative frequency for the conduct of inspections: (1) the EPA Region 6's February 7, 2001, approval for multiple mills at IP locations: (a) Texarkana, Texas; (b) Pine Bluff, Arkansas; (c) Mansfield, Louisiana; (d) Bastrop, Louisiana; and (e) Pineville, Louisiana; (2) the EPA Region 4's April 30, 2001, approval for the Riegelwood Mill in Riegelwood, North Carolina; and (3) the EPA Region 3's June 26, 2001, approval for the Spring Grove Mill in Spring Grove, Pennsylvania (the EPA's Applicability Determination Index (ADI) - Control Number (CN) M120029).

### **The EPA's Review**

Under 40 C.F.R. § 63.453(k), each enclosure and closed-vent system used to comply with 40 C.F.R. § 63.450(a) shall comply with the following requirements: (1) for each enclosure opening, a visual inspection of the closure mechanism specified in 40 C.F.R. § 63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed; (2) each closed-vent system required by 40 C.F.R. § 63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects; and (3) the valve or closure mechanism specified in 40 C.F.R. § 63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Under 40 CFR 63.453(l), each pulping process condensate closed collection system used to comply with 40 C.F.R. § 63.446(d) shall comply with the following requirements: (1) each pulping process condensate closed collection system shall be visually inspected every 30 days and shall comply with the inspection and monitoring requirements specified in 40 C.F.R. § 63.964 of Subpart RR of part 60, except: i) owners or operators shall comply with the recordkeeping requirements of 40 C.F.R. § 63.454 instead of the requirements specified in 40 C.F.R. § 63.964(a)(1)(vi) and (b)(3) of Subpart RR of Part 60, and ii) owners or operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in paragraphs (a) and (k) of 40 C.F.R. § 63.453 instead of the requirements specified in 40 C.F.R. § 63.964(a)(2) of Subpart RR of Part 60; and (2) if an inspection required by this section identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then corrective actions specified in 40 C.F.R. § 63.964(b) of Subpart RR of this part shall be taken.

### **The EPA's Determination**

Based upon a review of the EPA's ADI, we have identified one previous determination in which the EPA granted approval to conduct periodic inspections on an alternative inspection frequency (ADI CN M120029). Additionally, you included several (six) EPA approvals which were not published in the ADI. The AMPs proposed by IP are consistent with similar AMPs issued by the EPA which allow for alternative inspection frequencies.

Please note that our approval does not alter IP's obligations to meet all other applicable NESHAPs, including, but not limited to, the following NESHAP general provisions:

- The requirement to maintain and operate affected facilities and associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions, per 40 C.F.R. § 63.6, and
- The prohibition against concealing emissions which would otherwise constitute a violation of an applicable standard, including the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, per 40 C.F.R. § 63.4.

My staff consulted with the EPA's Office of Air Quality Planning and Standards and the EPA's Office of Enforcement and Compliance Assurance before approving this request. This approval is consistent with similar approvals issued by the EPA. If you have any questions about this conditional approval, please contact Tracy Watson of my staff at (404) 562-8998 or by email at [watson.marion@epa.gov](mailto:watson.marion@epa.gov).

Sincerely,

**ANTHONY TONEY**  
 Digitally signed by ANTHONY TONEY  
 Date: 2023.08.10 09:41:36 -0400

Anthony G. Toney  
 Acting Director  
 Air and Radiation Division

cc: Melissa Fortenberry, MDEQ  
 Ashley Kimes, IP  
 Matt Kollman, EPA OAQPS  
 Robert Scinta, EPA OECA