

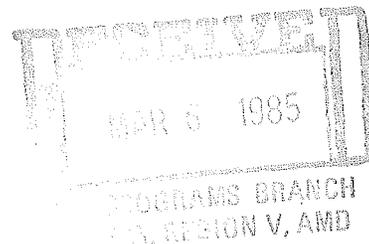
Dean Wilson



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

28 FEB 1985

Mr. David C. Anderson  
Corporate Environmental and  
Energy Affairs  
1400 Holcomb Bridge Road  
Roswell, Georgia 30076



Dear Mr. Anderson:

In response to your February 4, 1985, letter, our staffs have reviewed the revised modeling protocol (copy enclosed) for the Coosa Pines Mill and offer the following comments.

Modeling

1. If your consultant (ERT) has not already done so, they need to establish that their version (SST) of the ISC model produces equivalent results to the EPA Region I version. This is accomplished by running the model on their own computer for certain test cases that EPA's Region I has devised. Contact Stephen Perkins (617-223-4866) for details. If ERT has already satisfied Region I that their model is equivalent, then this fact merely needs to be documented in the final analysis.

2. EPA will be carefully reviewing the background concentrations to be added to the model results. If a single 24-hour background concentration of  $72 \text{ ug/m}^3$  is to be added to all modeled estimates, Alabama DEM should, in the analysis, provide the basis for this number and establish that it is conservative.

3. Kimberly-Clark should establish that the receptor network to be used in Complex I is comprehensive and will not miss receptors of expected high concentration. The estimates of Complex I are sensitive to the elevation of a receptor in relationship to plume height and the standard receptor network will sometimes miss critical points in this regard.

4. For modeling the impacts of Georgia Pacific and Asphalt Products (page 4), a definition of "insignificant" impacts should be provided.

5. Task 6 indicates that annual compliance will be demonstrated using the highest annual ISC estimate over the 5-year period of record. However, in Task 7, for the annual compliance demonstration with VALLEY, the protocol seems to indicate that only 1 year of data would be used. We suggest that this be clarified to be consistent with Task 6, i.e., use 5 years of data.

6. Task 6 appears to address only Alabama Power and Kimberly-Clark for assessment of compliance with the standards. This task should identify which sources are to be modeled for both the short-term and long-term since Task 5 could result in modeling Asphalt Products, Georgia Pacific, Alabama Power, and the mill for both the short- and long-term analyses.

### Stack Height

As you probably know, on November 9, 1984, EPA proposed revised stack height regulations in response to the U.S. Court of Appeal's decision on EPA's 1982 regulations (see 49 Federal Register 44878-44887). As stated on page 44885 of the Federal Register, EPA intends to use the November 9 proposal to govern stack height credits during the period before promulgation of the final stack height regulations. These credits will be subject to review against the final regulations and may need to be revised.

For stacks that are not grandfathered and where stack heights are above 65 meters, only the good engineering practice (GEP) stack height should be input into the national ambient air quality standards (NAAQS) analysis. However, for stacks that are grandfathered or where emission limits were set based on the actual height, the actual stack height should be input for sources that are credited against the prevention of significant deterioration (PSD) baseline, i.e., sources with negative emissions in Table 2.

### Emissions Inventory

1. Current policy on control strategy evaluation and testing with the short-term national ambient air quality standards requires that point sources should be modeled using allowable emission limits and design capacity (100 percent load). For the annual standards, these sources should be modeled at allowable emission limits, design (i.e., permitted) capacity, and historical maximum annual hours of operation as defined by the last 3 years of operation. If any of the sources' physical characteristics make it impossible to emit at the allowable capacity, the achievable maximum capacity may be used as long as this capacity is contained in an enforceable permit. Permitted capacity may also be amended to conform to actual capacity if accompanied with appropriate measures to physically limit emissions to assure that the new permitted capacity will not be exceeded. Emissions from area sources should be based on annual average conditions.

Nearby background point sources which are expected to cause a significant gradient in the vicinity of the source(s) under consideration for a SIP revision should be explicitly modeled. For evaluation against the short-term standards, these background sources should be modeled at the maximum allowable emission limit and full capacity for the full time period at question (i.e., 3-hour, 24-hour). For evaluation against annual standards, these background sources should be modeled at worst case actual emissions with the historical maximum annual number of hours of operation based on

the last 3 years of operation. (For example, as a significant background source, Alabama Power should be modeled at its allowable emission limit and 100 percent operating load for the short-term national ambient air quality standard evaluation. For the annual national ambient air quality standard evaluation, it should be modeled using the maximum actual emission rate and maximum actual capacity with the highest number of operating hours as defined from the last 3 years of operation.) Please review the data in Table 1 against this policy and provide a justification for the data in the final analysis.

2. Kimberly-Clark sources Z001 and Z004, Table 2, are not shown on Table 1. If these sources are shutdown, it should be addressed in the protocol along with any others that closed down.

3. The discussion of the #3 bark boiler, Task 3, states a proposed increase in emissions of 105.8 lbs/hour while Table 2 shows 92.9 lbs/hour.

4. The discussion on Task 3 should clarify the emissions decrease for Kimberly-Clark's #2 smelt tank, Z005, without an associated change in stack parameters if the decrease is due to control equipment.

5. As a general comment about PSD, EPA must be assured that the emission rates in Table 2 to be used for the PSD analysis, meet EPA policy on modeling for comparison against allowable increment. The basis for the emissions in Table 2 should be substantiated in the final analysis. Please confer with EPA Region IV for guidance in this matter.

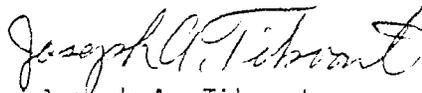
These comments comprise the concerns that EPA/OAQPS has on the protocol; if you have any questions, please feel free to contact either of us. Please be aware that EPA Region IV may have some additional concerns on requirements which need to be satisfied. Please coordinate with them in this regard.

Sincerely,



G. T. Helms  
Chief

Control Programs Operations Branch



Joseph A. Tikvart  
Chief

Source Receptor Analysis Branch

Enclosures

cc: Archie Lee, Region IV  
Steve Perkins, Region I  
Sue Robertson, Alabama DEM

David M. Shea, ERT  
Winston Smith, Region IV