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SENT VIA ELECTRONIC MAIL

July 2, 2021

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Re: New-Indy Catawba LLC Section 114 Information Request for ASB Testing Response

Mr. Taylor and Mr. Foley

New-Indy Catawba LLC (New-Indy) owns and operates a pulp and paper mill in Catawba, SC (Mill). This letter is being submitted in response to the information request issued by the U.S. EPA on June 30, 2021 pursuant to the Section 114(a)(1) of the Clean Air Act (CAA). The following individuals were consulted with in preparing responses to this request:

- Dan Mallett – New-Indy Catawba Environmental Manager
- Sheryl Watkins – ALL4, LLC, Sr. Technical Manager – over 33 years professional experience
- Steve Moore – ALL4, LLC, Sr. Managing Consultant – 33 years professional experience

- Lizzie Smith – ALL4, LLC, Managing Consultant – 6 years professional experience

Responses to the numbered items in the information request are provided below.

1. The EPA request for information issued on June 2, 2021, required the sampling and analysis of the inlet, outlet, and surface of the Post-Aeration Tank. In New Indy's June 15, 2021, response to the EPA request, New Indy stated that the Post-Aeration Tank had been enclosed and a carbon filter installed, with the approval of the South Carolina Department of Health and Environmental (SC DHEC). Since the cover used for the enclosure would have to be removed to conduct the required surface sampling from the Post-Aeration Tank, New Indy requested EPA and SC DHEC approval to remove the cover to perform the sampling. The EPA is approving the temporary removal of the cover for as long as is necessary to take the samples and for New Indy to reinstall the cover immediately after taking the samples in order to minimize uncontrolled emissions from the Post-Aeration Tank.

   New-Indy Response: New-Indy will temporarily remove the cover of the Post-Aeration Tank to allow sampling of the surface of the tank and replace the cover immediately after each sampling event.

2. The EPA request for information issued on June 2, 2021, required the use of the National Council for Air and Stream Improvement (NCASI) Method RSC 02.02 to sample and measure the concentration of all four total reduced sulfur (TRS) compounds (hydrogen sulfide, methyl mercaptan, dimethyl sulfide and dimethyl disulfide) at each sampling point. In New Indy's June 15, 2021, response to the EPA request, New Indy stated it is unaware of any laboratory in the U.S. currently capable of running NCASI Method RSC 02.02 or that will be capable of running NCASI Method RSC 02.02 during the time period of the New Indy initial performance test (IPT). As an alternative, the EPA will allow the use of EPA Method RSK-175, a method that commercial laboratories are equipped to run. Therefore, for all measurements of TRS compounds required by items Nos. 1-3 in the EPA request for information issued on June 2, 2021, that have not yet been sampled, New Indy shall run EPA Method RSK-175 with the following caveat:

   a. The samples collected during the test will not be preserved to a pH of 2 in the field or in transit to the laboratory. New Indy shall require the laboratory to acidify the sample to a pH of 2 immediately before running the analysis to avoid release of hydrogen sulfide prior to the laboratory measurement.

   New-Indy Response: New-Indy will use EPA Method RSK-175 for the TRS compound testing required by the EPA request for all samples that have not been collected as of July 1, 2021. New-Indy also intends to collect samples to be analyzed via the ALS Sulfur Liquid Method in parallel to the EPA Method RSK-175 analysis.

3. The EPA request for information issued on June 2, 2021, required the initial performance testing be completed by no later than July 16, 2021 and submit a report of the testing results and calculations to EPA within 14 days of completion of the testing but no later than July 30, 2021. In New Indy's June 15, 2021, response to the EPA request, New Indy referenced the testing and reporting requirements of 40 CFR §63.7(g)(1) as it related to the requirements of 40 CFR Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (MACT Subpart S). However, the testing and reporting deadlines identified by the EPA in the request for information issued on June 2, 2021, are deadlines set by the information request, pursuant to Section 114(a)(1) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a)(1). As such, the testing deadline of July 16, 2021, and the reporting deadline of July 30, 2021, are established by

the authority of Section 114 of the Act and not by the regulatory requirements of the MACT Subpart S. If New Indy determines that more time is needed, New Indy has the option of formally requesting in writing an extension of the deadlines set in the June 2, 2021, EPA request for information, which will be given proper consideration.

New-Indy Response: New-Indy formally requests an extension of the reporting deadline set in the June 2, 2021, EPA request for information to within 45 days of the completion of the testing but no later than August 30, 2021. The contract laboratories performing the analyses for this sampling program are currently unable to guarantee expedited turnaround times, and as such, New-Indy does not anticipate final quality assured sample results from the various laboratories will be available for at least 14 days following receipt of the samples by each laboratory, which may be up to 48 hours after completion of the testing. Following receipt of all sample results from every laboratory, New-Indy must perform calculations and then quality assurance checks must be completed. New-Indy anticipates the calculations and quality assurance activities will require approximately 14 days following receipt of all laboratory results. Following quality assurance of the required calculations, New-Indy will prepare a final report for submission with 45 days of the completion of testing, but no later than August 30, 2021.

I certify that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001, 1341 and 1505.

If you have any questions or require additional information, please contact Dan Mallett at (803) 981-8010 or dan.mallett@new-indycb.com.

Sincerely,

Charles Cleveland
Technical Manager

CC: David Monroe, SCDHEC