From: Leathers, James
To: Osbourne, Margaret
Cc: Allen, Toni
Subject: Re: Information on Georgia Pacific facilities in Crossett, AR (Ashley County)
Date: Thursday, February 27, 2014 2:56:00 PM

Hi Margaret,

As Mort explained in one of his emails, the facility reports as a multi-establishment, sometimes reporting the same chemical up to three times. I did a cursory review of all three permits focusing on H2S. The permits have performance standards for Total Reduced Sulfur and H2S, referenced in 40 CRF subpart BB-Standards of Performance for Kraft Pulp Mills, A.C.A §8-3-103 Hydrogen Sulfide Emissions, and potentially numerous other federal regulations. However, these limits are difficult to relate to the TRI reported quantity. With some additional time, specific reporting requirements can be investigated if they exist, and applicable reports from the state can be reviewed to help determine compliance.

Mort mentioned that as a starting point, the emission estimate needs to be checked for accuracy. Then, the inputs to the emission calculations can be verified to be point air emissions from specific equipment/processes. There may be very large non point H2S sources that contribute to the large TRI quantity. Then, the appropriate values can be used to verify permit limits. Mort indicated to Toni and me that he would be happy to add an information request to his list for TRI H2S data (our 114 equivalent) for this facility. Otherwise, I don't know how we can know if the large H2S TRI quantity is related to an air compliance issue.

Of course I wish I had something more definitive, but please let me know if you have any questions. Thanks

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