

A-916-56
VII-B-09(rrr)

From: Dipan Shah <DIPAN_SHAH@mail.dnr.state.ga.us>
To: "STELLA.GREG@EPAMAIL.EPA.GOV" <STELLA.GREG@EPAMAIL...>
Date: 4/2/98 9:04am
Subject: International Paper Company's comments on NOx SIP Call -Reply-Reply

Greg,

>From a review of the available information that we have on the subject facility (including its Title V permit application), it appears that the boiler capacities and emission estimates while not exactly same to the second decimal, are close enough to be used for the purposes intended.

Attachment 1 does not indicate SCCs for #2 and #3 Recovery Boilers, Riley Boiler and #3 Power Boiler. As indicated in my earlier e-mail, we do not believe that Riley boiler should be included. The SCCs for the remaining equipment are as follow:

#2 Recovery Boiler SCC 30700104
#3 Recovery Boiler SCC 30700104
#3 Power Boiler SCC 10200601

While we do not mind providing assistance in this matter, we feel that if any further information is required on the equipment (such as stack parameters) then the burden should be on the facility to provide such information.

Thanks,
Dipan

>>> GREG STELLA <STELLA.GREG@epamail.epa.gov> 03/30/98 04:12pm >>>
Dipan,

Thank you for your reply to our letter. What, in fact, we are looking at is more the inventory related issues as opposed to the budget issues. I already feel that the large, medium, and small classifications will change in the next budget calculation and need more the validation of source size and emissions estimates. In attachment 1, if you can verify that the SCC, boiler rated capacity, and International Paper emission estimates are correct, we will include (or not include) the relevant information per your comments.

Thanks,



Greg

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>>> Dipan Shah <DIPAN_SHAH@mail.dnr.state.ga.us> 03/27/98 11:08am
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Gregory,

This is about International Paper Company's comments relevant to the notice of proposed rulemaking for Ozone Transport SIP Call. We appreciate the opportunity to assist in the assessment of these comments. We have reviewed the available information, in the short time we were given, and have the following response to the Emission Inventory Corrections (Attachment 1) request for their facility in Georgia (AIRS No. 13-245-0006).

While the EPA's list of "Large Non-Utility Point Sources" indicates four sources: No. 1 Lime Kiln, No. 2 Lime Kiln, No. 1 Power Boiler, and No. 2 Power Boiler, the facility has requested that No. 1 Lime Kiln be deleted from the list and No. 3 Power Boiler, Riley Boiler, and No. 2 and 3 Recovery Boilers be added to the list. According to the EPA's definition, large sources are those with heat input greater than or equal to 250 MMBTU/hr and medium sources are those with daily emissions greater than 1 ton/day and with heat input less than 250 MMBtu/hr. Using this rationale, it appears that both No. 1 and No. 2 Lime Kilns should be deleted from the list as their heat inputs are less than 250 MMBtu/hr and their daily emissions are less than 1 ton/day. The heat input for each of the two Recovery Boilers (No. 1 and 2) and No. 3 Power Boiler is greater than 250 MMBtu/hr. Therefore, they should be added to the list. However, we believe that the Riley Boiler should not be added to the list as it is only permitte

If you have any additional questions or if you need any further help in updating the inventory files, please contact me at 404/363-7091 or Dale Kemmerick at 404-363-7092.

Dipan

CC: "gordonservice@ipaper.com" <gordonservice@ipaper.c...