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**Subject:** International Paper Company

CT DEP's response to comments from International Paper Company (IPC)  
Docket # A-96-56  
IV-D-87

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In IPC's comments to EPA, they provide several "corrections" to the inventory. For CT, IPC adds one source (Sprague Mill) which they state they could not find in the latest EPA inventory. In fact, the source is already listed in EPA's large source inventory as Federal Paper Board (FPB) Co. The company changed names (or was sold) several years ago, thus the reason for the plant name change. CT DEP recommends that Federal Paper Board Co. be corrected to International Paper. "Sprague Mill" could be used to describe the unit.

After checking CT DEP's inventory, it appears that EPA's value for FPB for "Emissions NOx 1990 (daily tons)" is incorrect. CT DEP believes the value should be 0.92 rather than 0.75.

In general, it appears that IPC's methodology for determining their "Actual Estimate (tpd)" values is not consistent with EPA's methodology. For IPC's CT plant, they used 1996 fuel use data (rather than 1990) and AP-42 uncontrolled emission factors to calculate their Actual Estimates. Despite having a much lower NOx permit limit and having low NOx burners, IPC ignored those factors and just applied the AP-42 emission factors. This seems to be the methodology they used for their sources in other states as well as CT. EPA should not accept IPC's values without further review. IPC should also be asked to re-review the current inventory to find sources they may have overlooked on the first review, such as their source located in CT under a different name.

