



G L A T F E L T E R
Beyond Paper

February 26, 2009

Ms. Jennifer Hunter
Ohio EPA, Division of Air Pollution Control
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43215

Re: Ohio's State Implementation Plan (SIP) for Regional Haze

Dear Ms. Hunter:

P.H. Glatfelter Company – Chillicothe Facility (Glatfelter) is pleased to provide the following comments on Ohio's State Implementation Plan (SIP) for Regional Haze. Glatfelter's facility includes two (2) sources that are specifically identified in the SIP as affected units that must comply with the requirements of Best Available Retrofit Technology (BART). The Chillicothe facility and Ohio EPA have worked cooperatively for a number of years on these requirements and Glatfelter appreciates the efforts and considerations of your staff.

1. Control Technology

The SIP identifies the Overfire Air and Sorbent Injection System (OASIS) as BART (page 21 of 37). OASIS is one technology that was evaluated in the Engineering Analysis process. Glatfelter is prepared to accept that the emission levels achieved by OASIS can serve as BART; however, as indicated in Appendix D, Glatfelter should be permitted to select alternative technologies or strategies that achieve emission levels equivalent or better than levels based on the control capabilities of OASIS.

2. Timing

The SIP identifies (page 22 of 37) the demonstration of compliance with the daily emission limitation by December 31, 2012. On July 6, 2005, US EPA published Appendix Y of 40 CFR Part 51 "Guidelines for BART Determinations under the Regional Haze Rule". Section V Enforceable Limits/Compliance specifies that compliance limits are required no later than five years after EPA approves the Regional Haze SIP. The Regional Haze SIP was due by December 17, 2007; however, Ohio EPA submitted their Regional Haze SIP on December 31, 2008, and US EPA has up to one year to approve Ohio's SIP. This would give Glatfelter only up to three years to attain compliance with these new limits. This would be less time than the SIP provides for electric generating units to meet BART requirements by complying with EPA's Clean Air Interstate Rule ("CAIR"), which phases in tighter emission limits for a higher-emitting range of sources by the year 2015.

In addition, the US EPA is expected to impose additional requirements that may also impact these sources and the selection of appropriate control technology. One such regulation is the

vacated Industrial Boiler MACT (40 CFR Part 63, Subpart DDDDD). That regulation will likely impose emission control requirements for a range of hazardous pollutants which could very well affect the cost or effectiveness of the BART controls if those controls are not designed to reflect the ultimate Boiler MACT requirements as well.

Given the delay in the submittal and approval of the SIP, and the uncertainty of US EPA's response as well as potential future upcoming regulations such as the Boiler MACT rule, it is impossible to adequately design, order, and install control equipment by the date suggested. Glatfelter urges Ohio EPA to require compliance no earlier than the full five (5) years after US EPA approval, as afforded by Appendix Y. That schedule would still be well within the 2018 timeframe set out for SIP reassessment.

3. Economic Conditions

As mentioned in the Long Term Strategy (page 27 of 37), the current bleak economic condition in Ohio precludes justifying additional haze reductions covering a range of additional sources. The economic conditions in Ohio and across the United States are unprecedented. When Glatfelter submitted its BART Engineering Analysis to the Ohio EPA in the fall of 2007, the economic conditions were quite different. Due to these unfortunate and impactful economic times, Glatfelter's Cost Impact Evaluation and Financial Analyses included in the Engineering Analysis (Appendix G) must be reconsidered. Glatfelter should be given the opportunity to reevaluate the cost impact and resubmit the reevaluation for consideration.

Glatfelter appreciates your consideration of these comments and looks forward to further working with Ohio EPA on these requirements. Glatfelter reserves the right to submit future comments on the SIP as permitted and on the anticipated revised permit-to-install for the affected units.

Should you have any questions concerning these comments, please contact me at 740.772.3387.

Sincerely,



Kathy Wiedeman
Director, Environmental, Health and Safety

KAW:tc
File 3.28.1

c: Skip Missimer – Global Director, Environmental Affairs