

# Appendix A

P.H. Glatfelter's February 6, 2014 Letter



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February 6, 2014

Ms. Jennifer VanVlerah  
Ohio EPA, Division of Air Pollution Control  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Ms. VanVlerah,

As we discussed, P.H. Glatfelter Company – Chillicothe Facility (Glatfelter) is requesting a revision to the compliance dates for the Regional Haze Best Available Retrofit Technology (BART) requirements. Glatfelter's facility includes two (2) sources that are specifically identified in the State Implementation Plan (SIP) as affected units that must comply with the requirements of BART. These same sources, Boilers No. 7 (B002) and No. 8 (B003), are also affected sources under the Industrial Boiler MACT (40 CFR Part 63, Subpart DDDDD) regulation. Industrial Boiler MACT (MACT) imposes emission control requirements for a range of hazardous air pollutants including Carbon Monoxide (CO), Particulate Matter (PM), Mercury (Hg) and Hydrogen Chloride (HCl).

As Boilers No. 7 and No. 8 are affected by two separate regulations, the control technology selected must be capable of achieving the emissions limitations of both sets of requirements. Control technologies for the parameters of concern in MACT and BART include scrubbers, flue gas desulfurization, fuel change, boiler furnace modifications and electrostatic precipitators among others. The compliance dates for MACT have changed multiple times. MACT was published as a final rule on September 13, 2004 but was vacated on June 8, 2007. A revised rule was proposed in June 2010, and finalized on March 21, 2011.

The original compliance timetable for BART, December 31, 2014, was based upon, and in alignment with, the compliance timeframes for MACT. The actual Regional Haze rule allowed compliance up to 5 years from approval of Ohio's State Implementation Plan for Regional Haze. That date would be July 2, 2017. MACT was subsequently delayed in May of 2011 for further reconsideration. The most recent version of the MACT rule was published on January 31, 2013. Until the limitations set forth in the final Industrial Boiler MACT were fully promulgated, the planning and design necessary, for a project of this magnitude, was nearly impossible. Glatfelter was not comfortable implementing a strategy to address BART

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without having confidence it would also address MACT and not require an additional investment in time, resources and money that is not necessitated in an already strained economy.

Given that the federal regulations allow BART compliance up to July 2, 2017, Glatfelter requests that the BART compliance date be revised to coincide with the timing of MACT requirements. As you are aware, due to the complexity of the project, Glatfelter requested, and Ohio EPA approved, a 1-year extension request to the MACT compliance deadline (see attached).

Glatfelter appreciates your consideration 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. Glatfelter's Chillicothe facility and Ohio EPA have worked cooperatively for a number of years on these requirements and Glatfelter appreciates the efforts and considerations of you and your staff.

Should you have any questions concerning these comments, please contact me at 740-772-3387.

Sincerely,

Katherine A. Wiedeman  
Director, Environment, Health and Safety

KAW/ts

attachment

cc: Skip Missimer – Global Director, Environmental Affairs  
Eric Wood – VP, Printing and Carbonless Papers



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October 1, 2013

Mr. Dan Canter  
Ohio EPA - DAPC  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138-9031

**Re: Extension Request – 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters**

Dear Mr. Canter,

P.H. Glatfelter Company – Chillicothe Facility (0671010028) is submitting this Extension of Compliance request pursuant to 40 CFR Part 63, Subpart A, 63.6(i) General Provisions and 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Glatfelter has eight (8) industrial emission sources subject to this rule:

1. No. 7 Coal Boiler (B002)
2. No. 8 Coal Boiler (B003)
3. No. 6 Wood Residue Boiler (B013)
4. No. 1 Package Boiler (B014)
5. No. 2 Package Boiler (B015)
6. No. 24 Paper Machine Dryer (P021)
7. No. 12 Paper Machine Dryer (P025)
8. No. 32 Coater Dryers (P350)

No. 1 Package Boiler, No. 2 Package Boiler, No. 24 Paper Machine Dryer, No. 12 Paper Machine Dryer, and No. 32 Coater Dryers are natural gas fired units. These emission units are not subject to emission limits, but require periodic tune ups and a one-time energy assessment. The mill intends to meet the compliance date of January 31, 2016 for these emission units; therefore, the extension request does not include those five emission units.

Glatfelter is currently evaluating options for complying with the Boiler MACT emission limitations, as well as the Best Available Retrofit Technology (BART) requirements, for No. 7 Coal Boiler and No. 8 Boiler. These options include either retrofitting new control equipment or conversion to natural gas combustion, or a combination of both. Conversion to natural gas combustion would require installation of new gas pipelines and feed systems. Glatfelter is also exploring wet electrostatic precipitator (WESP) and combustion upgrades to the No. 6 Wood Residue Boiler to comply with the Boiler MACT emission limits. The necessary equipment selection and design, air permitting, installation, and start-up for all three boilers will likely jeopardize Glatfelter's ability to attain compliance by January 31, 2016.

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Glatfelter respectfully requests a one-year extension for compliance with the requirements of the following sections for the No. 7 Coal Boiler, No. 8 Coal Boiler, and No. 6 Wood Residue Boiler:

- Requirements of 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
- General requirements of 40 CFR Part 63, Subpart A – General Provisions as specified in 40 CFR Part 63, Subpart DDDDD, Table 10.

The following is being submitted as required by Subpart A, 63.6 (i)(6)(i):

(A) Description of the controls to be installed to comply with the standard:

Glatfelter is evaluating two options for No. 7 Coal Boiler and No. 8 Coal Boiler. One is conversion of these units to burn natural gas. This project would entail construction of gas pipelines and feed systems to the Chillicothe mill and to the boilers. The second option is installation of retrofit control equipment, such as a circulating dry scrubber and activated carbon injection system. A combination of these two options is also being reviewed.

Glatfelter is evaluating a WESP upgrade and combustion fuel/air ratio optimizations for the No. 6 Wood Residue Boiler.

(B) Compliance schedule:

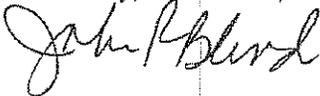
- (1) Contracts for emission control systems, or process changes for emission control, are estimated to be awarded by September 2014.
- (2) On-site construction, installation of emission control equipment or the process changes is estimated to be initiated by June 2015.
- (3) On-site construction, installation of emission control equipment or the process changes is estimated to be completed by September 2016.
- (4) Final compliance will be achieved by January 31, 2017.

(C) Currently, No. 7 Coal Boiler and No. 8 Coal Boiler are controlled with a multi-clone collector and dry ESP. No. 6 Wood Residue Boiler is controlled with a wet scrubber and a wet ESP. While the mill anticipates all three boilers will meet some of the new Boiler MACT standards, they will not meet all requirements. However, all of the boilers are in compliance with current regulations.

Glatfelter requests a letter reply from Ohio EPA indicating whether the requested compliance extension will be granted by Ohio EPA in accordance with the general provisions of 40 CFR 63 and the Ohio Administrative Code.

If you have any questions regarding this Extension of Compliance request, please contact Kathy Wiedeman at 740-772-3387.

Sincerely,



John R Blind  
Division Vice President, Printing and Carbonless Papers

JRB/kl

cc: Kim Lute  
Kathy Wiedeman

