Air Docket Section (6102)
Attention: Docket No. A-92-40
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Sir/Madam:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we are providing comments on the "announcement of supplemental information" for EPA's proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Pulp and Paper Production, which was published in the Federal Register on March 8, 1996 (61 FR 9383).

In general, STAPPA and ALAPCO support the proposed changes to the rule. We believe that most of these revisions improve the rule and make it easier to implement. We offer specific comments below.

Emission Factors

STAPPA and ALAPCO support the development of emission factors for mill "systems" rather than developing emission factors for individual emission points.

Subcategorization

The associations concur with EPA's proposed subcategorization for pulping process standards. The distinguishing characteristics of the four types of pulping processes make this subcategorization reasonable.

Level of Standards - Kraft

With respect to the level of standard for Kraft mills, the supplemental notice indicates that several commentors stated that weak black liquor storage tanks could not be feasibly controlled by simply venting the tanks to a header; rather they claim that more complex air sweep systems would be needed on older tanks because they could collapse if a vacuum were pulled on the tank. Based on this information, STAPPA and ALAPCO believe it is appropriate that any weak black liquor storage tank strong enough to withstand an appropriate vacuum should be subject to controls. Such tanks could be
identified by an appropriate engineering analysis or by age of the tank. Likewise, the standard for new sources should require the control of weak black liquor storage tanks.

**Level of Standards - Sulfite**

In the section describing the level of control for the sulfite industry, EPA states that it will require initial performance tests while the mill is operating under normal operating conditions and set operating and monitoring conditions that show long-term compliance with the standard. STAPPA and ALAPCO believe that periodic performance testing is necessary to account for degradation of the process and control equipment. Accordingly, periodic testing should be conducted to determine if the operating and monitoring conditions set during the initial tests are still appropriate; and if they are no longer appropriate, to adjust them accordingly. This approach should also be employed whenever performance testing is used in the standard to set "surrogate parameters" that determine compliance in lieu of emissions monitoring. Indeed, several state agencies currently require periodic testing of pulp mill emissions units when surrogate parameters are used to monitor compliance with criteria pollutant limits.

Additionally, EPA states that industry recommended a vent emission limit for sulfite mills of 2.5 lb methanol/ODTP as opposed to EPA's calculated limit of 0.45 lb methanol/ODTP derived from the same data set. STAPPA and ALAPCO believe that EPA should explain the reasoning and assumptions used to justify such a large increase in the standard.

**Level of Standards - Bleaching**

STAPPA and ALAPCO are concerned with EPA's decision to move away from using methanol as a surrogate for organic HAPs from bleaching processes and whether organic HAPs will be adequately controlled from the bleaching process. In conjunction with the lack of adequate organic HAP removal, odor reductions (total reduced sulfur (TRS)), will not be accomplished as a result of improvements in air emissions controls necessary to remove organic HAPs. The elimination of hypochlorite bleaching (see next comment) will result in chloroform reductions from the bleaching process. Since much of the rest of the organic HAP originates from the use of "dirty" wash water, the organic HAP emissions could be reduced by limiting the organic HAP content of the wash water. If methanol is not used as a surrogate for organic HAPs, the associations urge EPA to clearly define how the chosen approach will control the organic HAP and TRS emissions from the bleaching processes.

While the control of chloroform from bleaching processes will be regulated by EPA's Office of Water (OW), STAPPA and ALAPCO believe that it is appropriate to comment on this control requirement as part of this supplemental notice. The associations support the elimination of hypochlorite bleaching through chlorine dioxide substitution for all paper grades where it is technically feasible. Several state agencies have identified mills that have successfully eliminated hypochlorite bleaching, thereby eliminating chloroform
emissions. Based on these experiences, it appears that the elimination of hypochlorite bleaching is the only economically feasible method for controlling chloroform emissions.

Compliance Extension for Kraft Mills

STAPPA and ALAPCO support the 5-year compliance extension for existing brownstock washers and oxygen delignification units at kraft mills. We agree that due to the unique compliance and timing issues involved in the cluster rule, additional compliance time to allow for a complete evaluation of all pollution control options for kraft mills will produce greater environmental benefits than requiring compliance within three years.

Emission Averaging

With respect to EPA's consideration of emissions averaging for this standard, STAPPA and ALAPCO are generally opposed to the use of emissions averaging for HAPs, but believe that in this instance limited emissions averaging may be useful to minimize the overall cost of compliance while still achieving the desired emissions reduction. It is important that any emissions averaging plan contain enforceable mechanisms and be able to achieve reductions equal to or greater than those under the NESHAP or best available technology (BAT).

In order for an emissions averaging plan to be enforceable, a facility should be able to demonstrate compliance for any single emissions unit at any given point in time. To help accomplish this goal, the number of emissions points included in the emissions averaging should be limited (as is done in 63.150(f)(1) of the Hazardous Organic NESHAP (HON)). STAPPA and ALAPCO believe that the emissions averaging scheme should be "static," not "dynamic." A dynamic emissions averaging scheme changes the number of emissions points and their levels of control over time. In contrast, under a static emissions averaging scheme, the facility proposes the emissions units to be included in the emissions averaging and their levels of control in an emissions averaging plan prior to the compliance date. A static emissions averaging scheme enhances enforceability because limits and/or requirements for the emissions units could only be changed with the prior approval of the permitting agency.

STAPPA and ALAPCO believe EPA should take appropriate steps to prevent problems that are associated with emissions averaging. There are two potential problems with emissions averaging that can reduce the overall environmental benefit of the standard. The first is inter-pollutant trading. Due to the complexities of quantifying the potential health effects of trading emissions of different pollutants, emissions averaging should be restricted to emissions streams of similar pollutants. Obviously the emissions from bleaching processes would be significantly different than those in the pulping processes or wastewater systems. But there also exists differences in the characteristics of emission streams within the pulping process and of the various wastewater streams. The second problem can arise when the health risks resulting from emissions averaging is greater than would be otherwise due to the location, dispersion characteristics, and compositions of the emissions streams involved in the emissions averaging. To address this problem,
permitting agencies should be allowed to require facilities to demonstrate that the overall health risks due to the emissions averaging is equal to or less than the risks if there were no emissions averaging.

Finally, permitting agencies should be given the option to restrict the use of emissions averaging, as in the emissions averaging provisions promulgated under the HON and Petroleum Refinery NESHAP.

**Relationship to Other Rules - New Source Review/Prevention of Significant Deterioration (NSR/PSD)**

STAPPA and ALAPCO are strongly opposed to the proposed provision under the "Relationship to Other Rules" -- NSR/PSD. We have identified several problems with exempting control device projects installed to comply with the Pulp & Paper MACT as pollution control projects. The associations assert, for reasons stated below, that these projects are not necessarily environmentally beneficial and should not be eligible for exemption from major NSR as pollution control projects. EPA should not provide a specific exclusion in the major NSR rules for these types of controls installed to comply with the MACT portion of the cluster rule. If EPA chooses to grant the exemption, then increment and NAAQS modeling and NSR offsets should still be required to ensure that progress made by permitting agencies to reduce air pollution are not compromised.

The combustion of TRS laden gases from pulping vents and stream stripper overheads can result in the emission of hundreds of tons per year of sulfur dioxide from a typical kraft pulp mill. According to table 2-4 of the background document for the proposed standard, the emission factor for pulping system vents and wastewater condensates for TRS is about 4-5 times higher than the HAP emission factor for the same emission streams. Since the combustion of a pound of TRS (measured as H2S) results in approximately 2 pounds of SO2, the increase in emissions resulting from the uncontrolled combustion of TRS can be an order of magnitude greater than the reduction achieved from complying with the NESHAP. Increased fuel burning or the addition of a new boiler to support vent gas combustion and the generation of additional steam for steam stripper can also result in significant emissions increases depending on the additional amount of fuel that will be burned and the type of boiler or combustion device. If this large increase in emissions is exempt from PSD or NSR requirements, the implementation of this NESHAP could result in less environmentally beneficial emissions than without the NESHAP.

The PSD and NSR procedures require the installation of BACT or LAER, respectively, which often means incineration of the TRS laden gases in lime kilns or incinerators with caustic scrubbers. Several states have reported the use of these controls either as BACT or LAER to reduce SO2 emissions below PSD/NSR applicability levels. We are unaware of significant operating problems with these systems. Without the requirements of PSD and NSR, many permitting agencies would lack the authority to require SO2 controls.
If emissions offsets are not required, an agency's efforts in achieving compliance with NAAQS may be jeopardized for those pollutants whose emissions increases are located in areas designated as nonattainment for those pollutants. For this reason, nonattainment requirements, including NSR and offsets, should be required for emissions increases caused by the implementation of this NESHAP for mills located in nonattainment areas.

The exemption of control device projects installed to comply with the Pulp & Paper MACT from PSD/NSR relieves the source from demonstrating that the PSD increment or NAAQS will not be exceeded. STAPPA and ALAPCO maintain that the PSD and NSR requirements should remain because increases in pollutants do consume incrementS and could contribute to modeled NAAQS violations. The associations urge EPA to require increment and NAAQS modeling to ensure that these standards are not violated, even if EPA does exclude these control device projects from PSD/NSR as pollution control projects. If sources are allowed to increase criteria pollutants without conducting modeling, subsequent construction or modifications in the area may be precluded if the increment or NAAQS has already been violated.

Relationship with Other Rules -
Kraft New Source Performance Standards (NSPS)

While STAPPA and ALAPCO support efforts to reduce conflict or redundancy between the Pulp & Paper NSPS and this NESHAP, the associations maintain that allowing a facility to choose compliance with the NESHAP in lieu of the NSPS for certain process equipment is inappropriate. In any case, changes in either standard should be made to ensure that the emissions reductions required by both standards are achieved. Obviously, revising the frequency of reporting in the NESHAP to be consistent with the NSPS should not compromise any emissions. The emissions units that require TRS monitors (recovery furnaces, lime kilns, and brown stock washer, multiple-effect evaporator, and condensate stripper systems that are not incinerated) are not the same as those regulated under the NSPS. When the same non-condensable gases (NCG) are required to be captured and controlled under both the NSPS and NESHAP, the incinerator monitoring, record keeping, and reporting requirements, should be "streamlined" so as not to conflict. In fact, this concept of "streamlining" has already been recognized in EPA's "White Paper II" and could be accomplished through a mill's Part 70 permit provided the permitting agency has incorporated the appropriate language into it's SIP. Finally, the associations urge caution in exercising these options because the NSPS and NESHAP standards were written to regulate different types of pollutants.

Thank you for the opportunity to provide our comments. If you have any questions, please do not hesitate to contact us, or the STAPPA/ALAPCO Secretariat.

Sincerely,

Robert H. Colby
Chairman
ALAPCO Air Toxics Committee
Donald F. Theiler  
Chairman  
STAPPA Air Toxics Committee  

cc: Penny Lassiter (MD-13, OAQPS)