



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

Rec'd by DAPC, OEPA

2014 FEB -7 AM 9:47

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

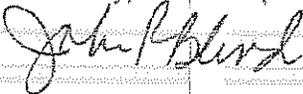
- (1) Contracts for emission control systems, or process changes for emission control, are estimated to be awarded by September 2014.
- (2) On-site construction, installation of emission control equipment or the process changes is estimated to be initiated by June 2015.
- (3) On-site construction, installation 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

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**Public Notice**  
**Ohio Environmental Protection Agency**  
**Revision to Ohio's Regional Haze State Implementation Plan**

Notice is hereby given that the Director of the Ohio Environmental Protection Agency, (Ohio EPA) is requesting that the United States Environmental Protection Agency (U.S. EPA) revise the current approved State Implementation Plan (SIP) for Regional Haze. On March 11, 2011, Ohio EPA submitted our Regional Haze SIP to U.S. EPA. Ohio's SIP was subsequently approved on July 2, 2012 (77 FR 39177). Ohio's SIP included the applicability of Best Available Retrofit Technology (BART) to Ohio's only BART source, P.H. Glatfelter. Ohio's submittal included a compliance date for BART emission reductions of December 31, 2014. This compliance date was aligned with P.H. Glatfelter's expected compliance date for the Industrial Boiler Maximum Achievable Control Technology (MACT) requirements promulgated by U.S. EPA in March of 2011 and allowed for achievement of BART well before the compliance date required by U.S. EPA's BART regulations. Under U.S. EPA's regulations (40 CFR 51.308(3)(1)(iv)), BART is to be implemented "as expeditiously as practicable, but in no event later than 5 years after approval of the implementation plan revision." This date is July 2, 2017.

U.S. EPA's Industrial Boiler MACT was subsequently litigated and a final revision was issued by U.S. EPA on January 31, 2013 which established a new compliance date for the MACT. On February 6, 2014, Ohio EPA received a request from P.H. Glatfelter to extend the original compliance date for BART to January 31, 2017 to align the BART compliance with the new compliance date associated with the Industrial Boiler MACT (as extended by Ohio EPA). The original compliance date was designed so that these dates aligned and allowed for P.H. Glatfelter to select and implement a control strategy that would address both the MACT and BART.

Ohio EPA is requesting U.S. EPA revise the approved Regional Haze SIP to allow for a compliance date of January 31, 2017 for BART.

These actions must be noticed to allow public comment and to satisfy USEPA requirements for public involvement in SIP related activities. This notice addresses Ohio EPA's request for U.S. EPA to approve a revision of the BART compliance requirements under the Regional Haze SIP. Written comments will be received on or before March 25, 2014 at the following address:

E-mail: [jennifer.vanvlerah@epa.state.oh.us](mailto:jennifer.vanvlerah@epa.state.oh.us)

Mailing address: Jennifer Van Vlerah  
Ohio Environmental Protection Agency, DAPC  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Pursuant to Section 119.03 of the Ohio Revised Code, a public hearing on this

redesignation request will be conducted as follows: **March 25, 2014 at 3:00 PM**, in Conference Room B at Ohio EPA, 50 West Town Street, Suite 700, Columbus, OH 43215.

All interested persons are entitled to attend or be represented at the hearings and give written or oral comments on these changes. All oral comments presented at the hearing, and all written statements submitted at the hearing or to the above address by the close of business on March 25, 2014 will be considered by Ohio EPA prior to final action on this redesignation. Written statements submitted after March 25, 2014 may be considered as time and circumstances permit, but will not be part of the official record of the hearing.

This redesignation and maintenance request is available on Ohio EPA DAPC's Web page for electronic downloading at: <http://www.epa.ohio.gov/dapc/SIP/haze.aspx>. Questions regarding accessing the web site should be directed to Arunee Niamlarb at 614-728-1342; other questions or comments about this document should be directed to Jennifer Van Vlerah, (614)-644-3696, or [Jennifer.vanvlerah@epa.ohio.gov](mailto:Jennifer.vanvlerah@epa.ohio.gov) or mailed to Jennifer Van Vlerah at the above address.



## 1                   P R O C E E D I N G S

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3                   MS. KENT: My name is Amber Kent. I am a  
4 Public Involvement Coordinator for Ohio Environmental  
5 Protection Agency's Public Interest Center. I will be  
6 presiding over today's public hearing.

7                   Thank you for taking the time to attend this  
8 hearing before Ohio Environmental Protection Agency.  
9 The purpose of the hearing today is to obtain comments  
10 from any interested person regarding Ohio EPA's  
11 proposed action.

12                  The State of Ohio is submitting to U.S. EPA a  
13 revision of the State Implementation Plan for Regional  
14 Haze for the State of Ohio.

15                  All interested persons are entitled to attend  
16 or be represented and to present oral and/or written  
17 comments concerning the proposed action. All written  
18 and oral comments received as part of the official  
19 record will be considered by the Director of Ohio EPA.

20                  To be included in the official record,  
21 written comments must be received by Ohio EPA by the  
22 close of business today, March 25th, 2014. These  
23 comments may be filed with me today or emailed to  
24 jennifervanvlerah@epa.ohio.gov.

1 All written comments submitted for the record  
2 receive the same consideration as oral testimony given  
3 today. Written statements submitted after today may be  
4 considered as time and circumstances permit, but will  
5 not be part of the official record of the hearing.

6 If you wish to present oral testimony at this  
7 hearing today and have not already signed the  
8 registration sheet, please do so at this time.

9 There is no cross-examination of speakers or  
10 representatives of Ohio EPA in public hearings such as  
11 this. Ohio EPA hearings such as this afford citizens  
12 the opportunity to provide comments on the official  
13 record, therefore we will not be able to answer any  
14 questions during the hearing. However, members of the  
15 panel may ask clarifying questions of the person  
16 testifying to ensure the record is as complete and  
17 accurate as possible.

18 Is there anyone here who wishes to testify at  
19 this time?

20 (No verbal response.)

21 As there is no one present who wishes to  
22 provide testimony, we will go off the record for 30  
23 minutes. It is currently 3:07 on March 25th, 2014.

24 (A recess was taken.)

1 MS. KENT: We are now back on the record. It  
2 is 3:37. There are no attendees present to present  
3 testimony, so I will remind you that written comments  
4 can be submitted through 5:00 today.

5 ~~Thank you for attending. The time is now~~

6 3:37 and this hearing is adjourned.

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8 Thereupon, on Tuesday, March 25, 2014, at

9 3:37 p.m. the hearing was adjourned.

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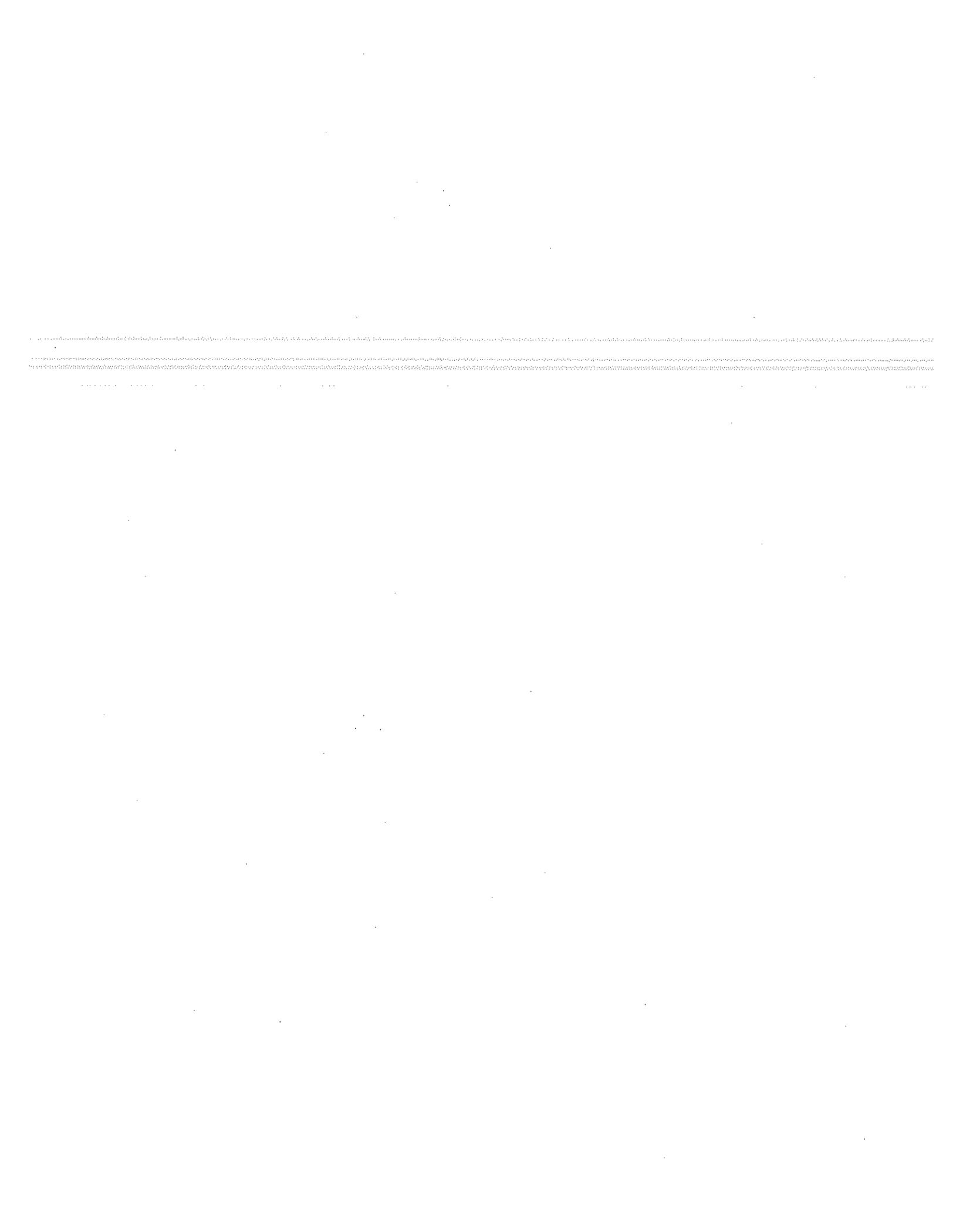
CERTIFICATE

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I do hereby certify that the foregoing is a true and correct transcript of the proceedings taken by me in this matter before the Ohio EPA, on Tuesday, March 25, 2014.

DIANE L. SCHAD,  
COURT REPORTER.

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## Division of Air Pollution Control

### Response to Comments

#### Revision to Ohio's State Implementation Plan (SIP) for Regional Haze – BART Compliance Date for P.H. Glatfelter

##### Agency Contacts for this Project

Division Contact: (Jennifer Van Vlerah, Division of Air Pollution Control, 614-644-3696, jennifer.vanvlerah@epa.ohio.gov)

Ohio EPA held a public hearing in Columbus, OH on March 25, 2014, regarding the revised State Implementation Plan for Regional Haze BART compliance date for P. H. Glatfelter. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on March 25, 2014.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

**Comment 1:** Thank you for your email alerting us to Ohio's requested Regional Haze SIP revision to extend the BART compliance date for P.H. Glatfelter. We recognize that the requested extension does fall within the timeframe required under the Federal BART rule, and therefore have no formal comments on the requested SIP revision. We would, however, still like to encourage "BART installation and operation as expeditiously as practicable." (Claire O'Dea- USDA Forest Service Eastern Region, submitted via email)

**Response 1:** Thank you for your comment. Ohio EPA agrees with the commenter that the extension falls within the Federal BART rule timeframe and; therefore, Ohio EPA believes the request should be approvable. The installation and operation of BART as expeditiously as practicable is a high priority to

Ohio EPA and the agency feels this is being observed by P.H. Glatfelter.

**Comment 2:**

Thank you for the opportunity to review Ohio's proposed SIP revision for P.H. Glatfelter. P.H. Glatfelter is subject to an alternative to BART. P.H. Glatfelter is required to install a control device, use alternate fuel, use low sulfur fuel, use a combination of measures, or permanently shut down a boiler to achieve a SO<sub>2</sub> emission limit of 24,930 pounds per calendar day for Boilers 7 and 8 combined. P.H. Glatfelter is to comply with the alternative to BART emission limits by December 31, 2014.

We are aware of requirements to add SO<sub>2</sub> scrubbers to satisfy BART at two other similar paper mills. The Georgia Pacific mill at Big Island, VA has, instead converted the subject boiler to natural gas firing. The Georgia Pacific mill in Green Bay, WI has a compliance date for adding scrubbers (and tail-end selective catalytic reduction) by the end of 2015. We know of no paper mill (besides Glatfelter) that has requested (or received) an extension of its BART compliance deadline.

The Regional Haze Rule requires compliance as expeditiously as possible. Similar paper mills have either complied or are on a schedule to comply well before the July 2, 2017 date proposed by Glatfelter. In the absence of a compelling reason for an extension, we believe that Glatfelter should meet its previously-approved December 31, 2014 compliance deadline. **(Pat Brewer- National Park Service, submitted via email)**

**Response 2:**

Thank you for submitting comments. Ohio EPA feels that P.H. Glatfelter's request for a BART compliance deadline extension from December 31, 2014 to January 31, 2017 is reasonable and they have provided justifiable reasons for this request. Ohio EPA is in agreement with this extension; due to the extension being within the original regulatory compliance date deadline of July 2, 2017. Ohio EPA believes this extension should be granted and will be sending P. H. Glatfelter's request to U.S. EPA for final approval.

**End of Response to Comments**