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April 23, 2021

**Via Electronic Mail (shealyrg@dhec.sc.gov)**

Renee Shealy, Chief  
Bureau of Environmental Health Services  
2600 Bull Street  
Columbia, South Carolina 29201

Re: New-Indy Catawba LLC – Response to DHEC April 9, 2021 York and Lancaster Odor Investigation Letter

Dear Renee:

This letter provides New-Indy's responses to the questions raised in your letter of April 9, 2021. Thank you for agreeing to an extension of time for us to respond to your letter.

Question #1 – What source(s) is the foul condensate tank collecting?

As part of New-Indy's compliance with the pulping condensates collection and treatment under 40 C.F.R. Part 63, Subpart S, the following streams are collected in the foul condensate tank:

- No. 1 Evaporator Pre-condenser, Intercondenser, and Aftercondenser Foul Condensates [40 C.F.R. § 63.446(b)(3)(i and ii)];
- No. 2 Evaporator Intercondenser and Aftercondenser Foul Condensates [40 C.F.R. § 63.446(b)(3)(i and ii)];
- No. 2 Evaporator - Surface Condenser Foul Condensates [40 C.F.R. § 63.446(b)(3)(ii)];
- No. 3 Evaporator Feed Effects (5th and 6th Effects) and Flash Tank Condensates [40 C.F.R. § 63.446(b)(3)(i)];
- HVLC Collection System Condensates [40 C.F.R. § 63.446(b)(4)]; and
- LVHC Collection System Condensates [40 C.F.R. § 63.446(b)(5)].

Question #1(a) – What are the estimated increased air emissions of total reduced sulfur (TRS), including hydrogen sulfide (H<sub>2</sub>S), from that activity into the wastewater treatment basin?

As described in Section 3.0, Section 4.2, and Tables 1 and 2 of the April 2020 Project Columbia Construction Permit Application Addendum, the TRS emissions from the wastewater system are projected to increase from 127.61 tons per year to 128.92 tons per year, and the H<sub>2</sub>S emissions from the wastewater system are projected to increase from 5.83 tons per year to 9.96 tons per year.

Question #1(b) – Can you test TRS, including H<sub>2</sub>S, emissions from sources going into the foul condensate tank? If no, why not?

Yes, it is possible to test streams that enter the foul condensate tank for TRS, including H<sub>2</sub>S.

Question #2(a) – It appears that the facility expects the total volume of wastewater to be treated and the methanol in the foul condensate to both be reduced by 50%. Is the facility experiencing that expected reduction at the WWTP at this time?

The new process at the mill began initial start-up on approximately February 1, 2021. The anticipated 50% wastewater volume reduction is outlined in the Project Description on page 2-1 of the April 2020 Project Columbia Construction Permit Application Addendum. An initial performance test (IPT) is required under the Addendum and we will conduct methanol studies at that time to determine if the process is achieving the anticipated 50% volume reduction.

Question #2(b) – How are the TRS emissions treated at the WWTP?

Depending on the compound, a portion of TRS remains in solution, a portion is emitted, and a portion is biodegraded.

Question #2(c) – Can the TRS emissions be tested at the WWTP?

Yes, it is possible to test the WWTP for TRS emissions.

Question #3(a) – The TRS air emissions from the paper machines appear to have increased. How and where are these emissions vented/released to the atmosphere? Are there any fugitive sources at the paper machines?

As described in Section 3.2 of the June 2019 Project Columbia Construction Permit Application and Section 4.2 and Tables 1 and 2 of the April 2020 Project Columbia Construction Permit Application Addendum, the TRS emissions from the paper machines are projected to increase (as described in more detail below). The paper machine emissions include vents and stacks to atmosphere and fugitive emissions inside of the paper machine buildings.

Question #3(b) – Can the TRS emissions be tested at these sources?

Yes, it is possible to test vents and stacks for TRS emissions.

Question #4 – Identify and quantify any other sources of emission increases.

The emissions increases and decreases are described in Section 3.0 of the June 2019 Project Columbia Construction Permit Application and Section 3.0, Section 4.2 and Tables 1 and 2 of the April 2020 Project Columbia Construction Permit Application Addendum. The TRS emissions from the paper machines are projected to increase from 1.15 tons per year to 18.33 tons per year. The TRS emissions from the wastewater system are projected to increase from 127.61 tons per year to 128.92 tons per year. The H<sub>2</sub>S emissions from the wastewater system are projected to increase from 5.83 tons per year to 9.96 tons per year. The TRS emissions from the Kraft mill non-condensable gases (NCG) system are projected to decrease from 17.24 to 7.00 tons per year. The H<sub>2</sub>S emissions from the Kraft mill NCG system are projected to decrease from 3.83 tons per year to 1.90 tons per year. The TRS emissions from the Kraft mill bleach plant are projected to decrease from 1.16 tons per year to 0.00 tons per year. No other increases or decreases in TRS or H<sub>2</sub>S emissions are projected in the June 2019 Application and April 2020 Addendum.

Question #5 – Conduct air dispersion modeling to characterize the impact from this project as compared to pre-modification.

Air dispersion modeling evaluations for this project were completed and are described in Sections 4.1, 4.5 and 4.6 of the June 2019 Application and Sections 4.1, 4.3 and 4.4 of the April 2020 Addendum.

Question #6 – What percentage of overall emissions are now fugitive or uncontrolled versus being emitted via a stack and controlled?

The controlled and uncontrolled stack and fugitive TRS and H<sub>2</sub>S emissions are described in the June 2019 Application, April 2020 Addendum, and February 2021 Title V permit modification request. They are also included in the chart below for reference:

	H <sub>2</sub> S	H <sub>2</sub> S	TRS	TRS
	tons per year	Percent	tons per year	percent
Uncontrolled Stack	9.68	41%	32.86	14%
Uncontrolled Fugitive	1.82	8%	62.29	27%
Controlled Stack (NCG System)	1.90	8%	7.01	3%
Controlled Fugitive (WWTP)	9.96	43%	128.92	56%
Total Emissions	23.36		231.07	

Please let us know if you have additional questions.

Sincerely,



Daniel J. Mallett  
Environmental Manager