



October 11, 2021

Submitted electronically through the Pennsylvania Department of Environmental Protection's eComment portal <http://www.ahs.dep.pa.gov/eComment>

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

**Re: Domtar Paper Company, LLC – Johnsonburg, PA Mill
Comments on RACT III Proposed Rulemaking**

To Whom It May Concern:

Domtar Paper Company, LLC (Domtar) owns and operates a pulp and paper mill in Johnsonburg, Pennsylvania (Johnsonburg or Mill). Domtar is submitting comments on the proposed rulemaking for the Additional Reasonably Available Control Technology (RACT) Requirements for Major Sources of Nitrogen Oxides (NO_x) and Volatile Organic Compounds (VOC) for the 2015 Ozone National Ambient Air Quality Standards (NAAQS), i.e., RACT III rule, prior to the deadline of October 12, 2021.

Domtar respectfully submits the following comments:

1. Proposed RACT III provision §129.112(g)(1) generally retains the RACT II presumptive emissions limitations for combustion units and process heaters from 25 Pa. Code §129.97(g)(1) while changing the 30-operating day average to a daily average at proposed provision 25 Pa. Code §129.115(b)(4). Requiring compliance be demonstrated on a daily averaging period, as opposed to the current 30-operating day averaging period, is a very significant tightening of those presumptive limits. This presents a significant compliance challenge for the vast majority of affected units that supply steam in a varying industrial setting such as our Mill.

Domtar operates two natural gas-fired boilers that supply steam through a common steam supply system. These boilers primarily provide steam for paper pulp production, paper making, and electrical generation most typically in a combined heat and power (CHP) mode with a steam turbine for electricity generation. While steady operation is always our goal, which is also our most efficient operation, we are an industrial operation that can have varying conditions that affect the load on the boilers and thereby also affect the NO_x emissions rate during startup, shutdown, low load conditions, and varying load conditions. At low fire and during transitional steam demand periods, boiler lb/MMBtu NO_x emissions tend to be higher than when at a steady full fire level. The current 30-day averaging period “normalizes” all of the different boiler steam load periods and has resulted in compliance with the NO_x limit under RACT II.



In addition to varying fuel firing conditions, a presumptive NO_x limit on a daily average basis cannot be met during periods of cold startups. These occur during unit outages for maintenance, when power outages occur, and when the entire Mill is shut down for an annual maintenance period. Restarts of the entire Mill can take days, as each paper machine must be brought up from a cold condition one at a time because of power and steam demand limits. The proposed rule makes no consideration for boiler cold starts.

Even on a 30-operating day average basis there cannot be many periods of operation above the emissions rate limit to demonstrate compliance, and a daily average leaves no allowance for varying industrial conditions. CEMS procedures for substituting missing data with the highest value recorded in the quarter almost always will assure non-compliance with the daily limits. PADEP can verify a number of these problems by reprocessing already submitted CEMS NO_x emissions data. Changing from a 30-operating day averaging period to a daily averaging period for industrial boilers and process heaters will not reduce NO_x emissions; rather, it will increase non-compliance with no economically feasible means to reasonably address compliance with this new averaging period.

As such, Domtar requests that the 30-operating day average as defined at proposed 25 Pa. Code §129.115(b)(1) apply for boilers and process heaters subject to proposed 25 Pa. Code §129.112(g)(1) to maintain the operational flexibility needed for these sources to meet the presumptive NO_x emissions limitation. Suggested revisions to the proposed rule are provided below in redline. Alternatively, Domtar requests the establishment of alternative standards (e.g., higher numerical emissions limitations or work practice standards) during periods such as low load operating conditions.

§129.115(b)(1) For an air contamination source with a CEMS, monitoring and testing in accordance with the requirements of Chapter 139, Subchapter C (relating to requirements for source monitoring for stationary sources) using a 30-operating day rolling average, except for municipal waste combustors subject to § 129.112(f) and combustion units or process heaters subject to § 129.112(g)(1).

§129.115(b)(4) For a combustion unit or process heater subject to § 129.112(g)(1) with a CEMS, monitoring and testing in accordance with the requirements in Chapter 139, Subchapter C, using a daily average.

In addition, although Domtar is requesting to eliminate the daily average, the term “daily average” is not defined in the proposed RACT III rule. Based on the current Continuous Source Monitoring Manual (CSMM) Revision 8, Domtar requests that the RACT III rule define this averaging period to be calculated and validated as follows: 1) a daily block average (one calculated compliance average per day), 2) calculated as the arithmetic mean of the 1-hour averages in the daily period, and 3) considered valid if it contains at least 18 valid 1-hour averages during the daily period.



2. Proposed §129.111(a) uses the language “in existence on or before August 3, 2018” to describe facilities subject to the rule. The term “in existence” is not defined. Domtar believes that the use of a term that is not otherwise defined, and in this instance makes the RACT applicability date unclear for some air emissions units, adds unnecessary confusion to implementation of this regulatory provision. Domtar proposes that PADEP add clarifying language to this provision as follows:

§129.111(a) ... that were in existence on or before August 3, 2018 (The term “in existence” for the purposes of applicability under §129.111 is defined as when an emissions unit has completed construction/installation and commenced operation as a source of air emissions).

3. For the 2016 RACT II submittal, Domtar expended significant time and resources to develop case by case analyses for the sources both with and without presumptive limits. For sources where the RACT II presumptive limit either did not change or is still not presented in the proposed RACT III regulations, Domtar requests that PADEP accept the 2016 cost analyses as valid case-by-case analyses for RACT III where the control cost exceeds the RACT III levels of \$3,750 per ton of NO_x and \$7,500 per ton of VOC as presented by PADEP in their regulatory analysis documents for RACT III. For Domtar’s Mill, redoing the previously submitted RACT analyses would take significant amount of time and effort, would not change the conclusion, and would lead to no environmental benefit.

Should you have any questions or require additional information, please contact me at (814) 965-6309.

Sincerely,
Domtar Paper Company, LLC

A handwritten signature in black ink that reads "Tony Casilio".

Tony Casilio
Environmental, Health and Safety Manager