

## **Appendix 9L**

**New Page- Paper Company BART Letter**

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February 2, 2010

AIR QUALITY DIV.

Mr. Bob Irvine  
Michigan Department of Natural Resources and Environment  
525 West Allegan Street  
P.O. Box 30260  
Lansing, Michigan 48909-0260

**Re: Escanaba Paper Company (EPC) Best Available Retrofit Technology (BART) Response**

Dear Mr. Irvine:

NewPage Corporation Escanaba Paper Company (EPC) has prepared the following response to address outstanding issues related to the Best Available Retrofit Technology (BART) analyses. EPC has prepared this response to reaffirm the conclusions of the original BART analysis and to reiterate that EPC believes that the original BART analysis is consistent with the intent of the BART guidance contained in 40 CFR Part 51 Appendix Y as well as the current U.S. EPA interpretation of BART requirements.

### **Background**

There are five (5) emission units at the EPC mill that have start-up dates between August 7, 1962 and August 7, 1977. EPC conducted a visibility modeling analysis using 24-hour worst-case actual emissions for each VIP for the BART-eligible source (i.e., each of the five emission units) at the mill. The results of the baseline visibility modeling indicated the BART-eligible source could contribute to visibility impairment under worst-case meteorological conditions and when all of the BART-eligible sources at the mill were emitting at their maximum 24-hour actual emission rates. Therefore the emission units (i.e. the BART-eligible source) are *subject to BART*. EPC then conducted a case-by-case five-step BART analysis for each emission unit comprising the BART-eligible source. The conclusions of the five-step BART analysis were provided to Michigan DEQ in a January 2007 report. Supplemental information has been submitted to Michigan DEQ to clarify and expand on the original BART report. The most recent information related directly to the BART report was submitted to Michigan DEQ in May 2008 and reflected the use of the 20% best days background data and the use of U.S. EPA's refined Interagency Monitoring of Protected Visual Environments (IMPROVE) equation.

### **EPC's BART Analysis**

The BART report that EPC prepared and submitted to Michigan DEQ in January 2007 outlined the potential control options for each of the five (5) emission units at the EPC mill. Using vendor quotes for control equipment and U.S. EPA's 2003 Air Pollution Control Cost Manual, EPC provided costs for installing and operating the control options where it was technically feasible to install control equipment. The control costs for all emission units were generally greater than \$10,000 per ton of VIP removed except for the No. 8 Power Boiler where select control costs for sulfur dioxide (SO<sub>2</sub>) and oxides of

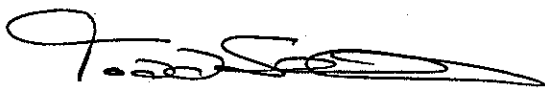
nitrogen (NO<sub>x</sub>) were approximately \$4,000 per ton of VIP removed. EPC believes that the SO<sub>2</sub> and NO<sub>x</sub> control costs for the No. 8 Power Boiler are at the high range of cost effectiveness. However, the consideration of a control cost by itself is an incomplete review under the Five Step case-by-case BART analysis. The five step evaluation of visibility impacts must be included in the case-by-case BART analysis.

The visibility modeling performed by EPC included pre-control and post control visibility impacts for each of the five emission units where control options were technically feasible. The visibility modeling demonstrated that the application of a control technology did not result in a meaningful improvement in visibility. For example, the addition of low NO<sub>x</sub> burners on the No. 8 Power Boiler would result in 0.12 deciview change in the 98<sup>th</sup> percentile visibility value. It is important to note that the procedures identified in 40 CFR Part 51 Appendix Y state the evaluation of visibility modeling is just a portion of the overall BART process and that even if modeled visibility impacts above 0.5 deciviews are predicted, the visibility impacts can be judged on a relative basis not an absolute basis. This means that 98<sup>th</sup> percentile results above 0.5 deciview can be judged to be acceptable.

Considering all of the factors in the five step case-by-case BART analysis, EPC believes there is no best available retrofit technology that would apply to any of the five (5) emission units at the mill. Therefore, since there is no BART, there are no control requirements and no enforceable emission limits that need to be established. As described in 40 CFR Part 51 Appendix Y enforceable emission limits are necessary when there are BART requirements (i.e., emission controls).

If Michigan DNRE has questions concerning this letter or the information that was presented in the January 2007 BART report, please do not hesitate to contact me at 906-233-2929.

Sincerely



Todd Schmidt  
Environmental Manager