



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

December 19, 2022

Troy Gayer
Environmental Engineer
International Paper Company
Orange Mill
1750 IP Way
Orange, TX 77632

Troy.gayer@ipaper.com

RE: Alternative Monitoring Plan (“AMP”) – Visual Inspections for Closed-Vent and Closed-Collection Systems Subject to National Emission Standards for Hazardous Air Pollutants (“NESHAP”) from the Pulp and Paper Industry (40 CFR Part 63, Subpart S) at the International Paper Company’s Orange Mill (“Orange Mill”) located in Orange, Texas; FRS 110053192264; Permit Number Operating Permit O-1408, TCEQ NSR 9654A.

Dear Mr. Gayer:

This letter is in response to your AMP dated July 14, 2022, for the Closed-Vent Systems and Pulping Process Condensate Closed-Collection Systems located at the Orange Mill in Orange, Texas. These systems are subject to NESHAP Subpart S. Based upon review of information provided, the United States Environmental Protection Agency (“EPA”) conditionally approves your request, as delineated in the enclosure to this letter.

This conditional approval is based upon prior consultation with our Office of Air Quality Planning and Standards (OAQPS) and our Office of Enforcement and Compliance Assurance (OECA) and is consistent with similar approvals issued by other regions. If you have any questions concerning this response, please contact Sarah Frey of my staff at (214) 665-6499 or frey.sarah@epa.gov.

Sincerely,

**JAMES
LEATHERS** Digitally signed by JAMES
LEATHERS
Date: 2022.12.19
13:02:10 -06'00'

For Steve Thompson
Chief,
Air Enforcement Branch

Enclosure

Ec: Kelley Spence, EPA OAQPS
Sarah Ayres, EPA OECA
Michael De La Cruz, Manager, Air Enforcement Section, Air Division, Texas Commission on Environmental Quality

ENCLOSURE

International Paper Company – Orange Mill Alternative Monitoring Plan (AMP) NESHAP Subpart S

International Paper Company (“IP”) submitted information pertaining to their Closed-Vent and Pulping Process Condensate Closed-Collection systems located at the Orange Mill in Orange, Texas. The AMP includes a proposed change to inspection frequencies in order to provide flexibility for actual mill operations and trained employee scheduling of required inspections.

The General Provisions of 40 CFR Part 63 provide for approval of minor modifications to monitoring requirements at 40 CFR §63.8(b)(1)(i), if the modification not decrease the stringency of the relevant regulation or is site-specific, made to reflect or accommodate the operational characteristics, physical constraints, or safety concerns. Under the provisions of 40 CFR §§ 63.453(k)(1) and (k)(5), inspections are to be performed “at least once every 30 days” and under the provisions of 40 CFR §§ 63.453(k)(2) and 63.453 (l)(1), inspections are to be conducted “every 30 days”.

Specifically, IP proposes a change to the fixed 30-day frequency for inspections required for the closed-vent and closed-collection systems subject to 40 CFR §§ 63.453(k) and (l). The required 30-day inspections may fall on weekends, vacations, or holiday periods when the appropriately trained personnel are not present to perform the required visual inspections. Therefore, IP has proposed that required inspections occur once each calendar month, with at least 21 days elapsed time between inspections.

To allow more flexibility without impacting the stringency of the standard, EPA is approving IP’s proposal to conduct inspections once per calendar month with at least 21 days elapsed between inspections. In addition, EPA also requires the inspections to occur with no more than 45 days elapsing between inspections:

For each applicable inspection requirement in 40 CFR §§ 63.453(k) and (l) that is currently conducted every 30 days, your required inspection frequency shall now be once per calendar month, with no less than 21 and no more than 45 calendar days elapsed between inspections.

This approval is subject to the following conditions:

- 1) International Paper Company – Orange Mill shall provide EPA with a copy of the site-specific monitoring plan at least 15 days before ceasing compliance with the regulatory frequency requirements of 40 CFR §§ 63.453(k) and 63.453(l). This plan will incorporate the alternative monitoring provisions outlined in this letter. Please submit this information electronically to Sarah Frey at frey.sarah@epa.gov.
- 2) International Paper Company – Orange Mill shall satisfy all applicable monitoring requirements found in 40 CFR §§ 63.453(k) and 63.453(l).

AMP Request, NESHAP Subpart S
International Paper Company – Orange Mill

Finally, and as provided at 40 CFR §63.8(f)(3), EPA may require the use of another specified monitoring method, requirement, or procedure if EPA finds reasonable grounds to dispute the justification provided for any exemption or any results obtained under this alternative monitoring method.