



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 18 2007

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Floyd Whitmire
IP Riegelwood Mill Manager
International Paper
865 John L. Riegel Road
Riegelwood, NC 28456

Dear Mr. Whitmire:

This is in response to your letter dated August 17, 2007, which requests the approval of an alternative test method for measuring the methanol concentration of gas emission streams from your Kraft pulp mill in Riegelwood, North Carolina. The method that you are proposing would be an alternative to Method 308 required by 40 CFR Part 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry, Section 63.457. You are proposing to use NCASI Method CI/SG/PULP-94.03, entitled, "Chilled Impinger Test Method for Use on Pulp Mill Sources to Quantify Methanol Emissions," developed by the National Council for Air and Stream Improvement (NCASI) to measure methanol emissions. I notified the NCASI by letter dated October 6, 2004, that this test method met Method 301 criteria for measuring methanol from pulp and paper mill sources provided that the tester uses the appropriate correction factor. A copy of this letter is enclosed. Based on the data submitted by the NCASI, we are approving your request for use of this alternative test method at your facility in Riegelwood, North Carolina.

Because we believe that this procedure is acceptable for use at any Kraft pulp mill, this approval to use NCASI Method CI/SG/PULP-94.03 applies to any other Kraft pulp mill owned by your company. In addition, this alternative to Method 308 may be used by any other company that owns a Kraft pulp mill if they choose to use it. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of this alternative to Method 308 is broadly applicable to all Kraft pulp mills. If you need further assistance, please contact Gary McAlister at (919) 541-1062.

Sincerely,

A handwritten signature in cursive script that reads "Conniesue B. Oldham".

Conniesue B. Oldham, Ph.D., Group Leader
Measurement Technology Group

Enclosure

cc: Jim Hammond, NC DENR
Stephen Shedd, EPA/OAQPS/SPPD

Mr. Jim Hammond
Division of Air Quality
North Carolina Department of Environment and Natural Resources
1641 Mail Service Center
Raleigh, North Carolina 27699-1641