

Attachment 13

From: [Kler, Denis](#)
To: [Foley, Patrick](#); [Fried, Gregory](#)
Cc: [Caballero, Kathryn](#); [Pratt, Marirose](#); [Dressler, Jason](#); [Russo, Todd](#); [Taylor, Kevin](#); [Mills, Andrew](#)
Subject: RE: New Indy steam stripper
Date: Monday, May 10, 2021 2:45:39 PM

Keeping everyone in the loop.

I got a call from Dan Mallett, New Indy, today at 1:21 pm. Dan stated that the steam stripper foul condensate flow rate averaged about 400 gallons/minute last week, and the foul condensate flow rate averaged about 197 gallons/minute to the ASB last week. I asked about the max foul condensate flow rate to the ASB and he said the max flow rate was about 300 gallons/minute to ASB. Dan stated that the max foul condensate flow rate to the AEB before the steam stripper restart was about 800-825 gallons/minute.

Dan also stated that the mill production is still struggling and the mill is still in the 180 startup period.

Dan mentioned that the even though the steam stripper has started operation, the mill and DHEC have still been receiving complaints, so we may want to be open to other potential sources of the emissions.

Denis B. Kler
U.S. EPA Region 4
Enforcement and Compliance Assurance Division
Policy, Oversight and Liaison Office
Phone: 404-562-9199

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From: Kler, Denis
Sent: Wednesday, May 5, 2021 8:54 AM
To: Foley, Patrick <Foley.Patrick@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>
Subject: RE: New Indy steam stripper

Pat,

One of the items in the steam stripper re-start table the company provided was the functionality of the incineration nozzles in the combination boilers. But I can double check that the SOGs are being incinerated in the one of the combination boilers.

According to my notes from the onsite evaluation on April 15, neither combination boiler #1 nor #2 have SO2 CEMS. They only have opacity monitors. To follow up on the SO2 question is that in the permit application dated April 24, 2020 (to shutdown the steam stripper and send all the foul condensate to the ASB), the company stated that there would be reductions in SO2, NOX, VOC, CO, TRS and H2S emissions from the combination boilers since they would no longer be incinerating the SOGs in the combination boilers. Now that the steam stripper is back online then those reductions are no longer there.

Moving forward, if they increase the steam stripper capacity to handle the additional foul condensate load, which will increase the amount of SOGs produced, then we would expect to see an increase in SO2 and other pollutants from the combination boilers due the incineration of the additional SOGs.

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From: Foley, Patrick <Foley.Patrick@epa.gov>
Sent: Wednesday, May 5, 2021 8:13 AM
To: Kler, Denis <Kler.Denis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>
Subject: RE: New Indy steam stripper

That sounds right to me as well. So after turning the stripper back on we still have almost 4x as much condensate going to the ASB as we did before the changes. They reduced the impacts but probably have not eliminated them.

Can you verify that incineration of TRS laden stripper off-gasses (SOG) is happening as expected in the boiler and identify which boiler is receiving them and whether it has an SO2 CEMS?

I do think at some point we need to have another discussion with the company. Can we talk about whether we do that soon or wait until after the 303 Order goes out? These impacts may go on until they either reduce operating rate to match condensate production to stripper capacity or install additional stripper capacity. It may make sense to lead them by the nose to that conclusion. Long term, they will need additional stripper capacity especially if they want to increase throughput as their recent permit application stated.

From: Kler, Denis <Kler.Denis@epa.gov>

Sent: Wednesday, May 5, 2021 8:04 AM

To: Foley, Patrick <Foley.Patrick@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>

Subject: RE: New Indy steam stripper

Pat I think we are on the same page here. During the opening meeting with the company on April 14, the company stated that as part of the conversion (from bleached to unbleached), the #1 evaporator train was modified to allow for higher black liquor throughput. I asked the company if they are running more black liquor through the evaporator train then are you producing more condensate, and they said yes. This seems to account for the increase in foul condensate being piped directly into the ASB (about 750-800 gallons/minute). It would also explain why the company had to install a larger diameter pipe from the foul condensate tank to the ASB (going from 90 gallons/minute to 750-800 gallons/minute). One question I have asked the company is now that the steam stripper is back in operation what is the flow rate of the foul condensate from the foul condensate tank directly to the ASB. The company responded to by saying they have to wait and see on the data. My guess is it will have to be about 370 gallons/minute (800 – 430).

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From: Foley, Patrick <Foley.Patrick@epa.gov>

Sent: Tuesday, May 4, 2021 3:59 PM

To: Kler, Denis <Kler.Denis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>;
Dressler, Jason <Dressler.Jason@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Taylor, Kevin
<Taylor.Kevin@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>
Subject: RE: New Indy steam stripper

The way I read the email from Dan Mallet is that prior to the change, they were stripping $430/(430+90) = 82.7\%$ of the foul condensate and after the change were stripping none of it. Put another way, using the current amount of foul condensate produced, they increased the amount of foul condensate hard-piped to the ASB by $800/90 = 778\%$ or are now sending almost $800/90 = 9$ times as much foul condensate to the ASB than they had previously. I think what Denis is saying they are now PRODUCING twice as much foul condensate as they previously produced.

Do you think what I wrote is right Denis? Its possible we are getting inconsistent descriptions of volumes and what is being counted as foul condensate and how it is getting to the ASB (hard-piped versus main flow to ASB).

From: Kler, Denis <Kler.Denis@epa.gov>
Sent: Tuesday, May 4, 2021 3:19 PM
To: Foley, Patrick <Foley.Patrick@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>;
Dressler, Jason <Dressler.Jason@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Taylor, Kevin
<Taylor.Kevin@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>
Subject: FW: New Indy steam stripper

Now the mill is sending about 750-800 gallons/minute directly to the ASB (little less than double).

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From: Dan Mallett <Dan.Mallett@new-indycb.com>
Sent: Tuesday, May 4, 2021 2:59 PM
To: Kler, Denis <Kler.Denis@epa.gov>
Cc: Pratt, Marirose <Pratt.Marirose@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason

<Dressler.Jason@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Pete Cleveland <pete.cleveland@new-indycb.com>

Subject: RE: New Indy steam stripper

Using a 12 month average prior from May 2019-May 2020, the average flow to the stripper was 430 gpm and the flow to the ASB through the hardpipe was 90 gpm.

DANIEL MALLET

Environmental Manager

Office: (803) 981-8010

Mobile: (207) 951-6216



From: Kler, Denis [<mailto:Kler.Denis@epa.gov>]

Sent: Tuesday, May 4, 2021 11:53 AM

To: Dan Mallett <Dan.Mallett@new-indycb.com>

Cc: Pratt, Marirose <Pratt.Marirose@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Pete Cleveland <pete.cleveland@new-indycb.com>

Subject: New Indy steam stripper

External E-Mail - Caution - This email originated outside of New-Indy. .

Dan,

I hope you are having a good day. I had a follow up question about our conversation we had on Monday morning. It is my understanding and correct me if I am wrong, that prior to September 2020, all the foul condensate was collected in the steam stripper feed tank (foul condensate tank). From the steam stripper feed tank about 400 gallons/minute was sent to the steam stripper. What was the flow rate from the foul condensate tank to the aeration stabilization basin prior to September 2020?

Let me know if you have any questions.

Thanks,

Denis

Denis B. Kler

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