Attachment 2

Policy, Oversight and Liaison Office
Phone: 404-562-9199

From: Kler, Denis
Sent: Thursday, October 14, 2021 9:05 AM
To: Russo, Todd <Russo.Todd@epa.gov>
Subject: New Indy - H2S in TRS

Following up our discussion yesterday about H2S being one of the largest components that make up TRS gases. See below.

New Indy test report dated July 21, 2021 (page17, table 2-15), data suggests that hydrogen sulfide in largest component in wastewater

New Indy test report dated August 2021 (page 3-3, table 3-1), data suggests that hydrogen sulfide in largest component in wastewater

"However, hydrogen sulfide is the predominant TRS compound emitted by kraft pulp mills." (page 2-3, EPA-450/2-78-003a, January 1978)

"However, hydrogen sulfide is the predominant TRS compound emitted by kraft pulp mills." (page 2-3, EPA-450/2-78-003b, March January 1979)

40 CFR Subpart BB, Standards of Performance for Kraft Pulp Mills
§ 60.281 Definitions.
(c) Total reduced sulfur (TRS) means the sum of the sulfur compounds hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide, that are released during the kraft pulping operation and measured by Method 16.

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