

Attachment 2

Phone: 404-562-9199

CONFIDENTIALITY NOTICE:

This electronic message, including attachments, may contain information that is proprietary, privileged, or confidential, and is exempt from disclosure. If you are not the intended recipient of this message, you may not disclose, forward, distribute, copy, or use this message or its content. If you have received this communication in error, please notify the sender immediately by electronic mail and delete the original message and all the copies from your system. Thank you.

From: Kler, Denis

Sent: Thursday, October 14, 2021 9:05 AM

To: Russo, Todd <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 (page 17, table 2-15), data suggests that hydrogen sulfide is largest component in wastewater

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

CONFIDENTIALITY NOTICE:

This electronic message, including attachments, may contain information that is proprietary, privileged, or confidential, and is exempt from disclosure. If you are not the intended recipient of this message, you may not disclose, forward, distribute, copy, or use this message or its content. If you have received this communication in error, please notify the sender immediately by electronic mail and delete the original message and all the copies from your system. Thank you.