EXHIBIT E

CORRECTIVE ACTION PLAN

AIR DISPERSION MODELING ANALYSIS

NEW-INDY CATAWBA, LLC – CATAWBA, SC MILL

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Submitted by:

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5.2.7 Background Ambient Air Data

Ambient background 1-hour and 3-hour SO_2 concentrations were considered for the Standard No. 2 AAQS compliance demonstration. The Mill added SO_2 design concentrations, maintained by DHEC, representing the most-recent three years maintained by DHEC (2017-2019) from the Greenville Employment Security Commission (ESC) ambient monitor (Site ID: 45-045-0015) located in Greenville, South Carolina.

Although the Greenville ESC ambient monitoring site is not the closest ambient monitor to the Mill, the closer sites in Lexington and Richland Counties are in more urban areas near Columbia. The Greenville ESC monitoring station is located in similar topography and land use as the Mill. Based on the similarities, the Greenville ESC monitor is representative of the conditions at the Mill.

SO_2 design values included in the air dispersion modeling analysis (post-model) are presented in Table 5-5.

Table 5-5
Background Concentrations

Pollutant	Averaging Period	Design Value Form	Design Value ($\mu g/m^3$)
SO_2	1-hour	99th percentile of daily maximum 1-hour averaged over 3 years	2.6
	3-hour	3-hour 2nd-High averaged over 3 years	3.8

5.3 AIR QUALITY MODELING RESULTS

Model-predicted ambient concentrations were compared to AAQS and MAAC to demonstrate compliance with Standard No. 2 and Standard No. 8, respectively. In addition, 1-hour model-predicted concentrations for H_2S and TRS were evaluated against the U.S. EPA 30-minute H_2S

Action Level. The air dispersion modeling analysis demonstrates that Mill-wide emissions of TRS (as H_2S), H_2S, and SO_2 are below the respective compliance levels for all averaging periods (Table 5-6).

5.3.1 South Carolina Standard No. 2 Results

Model-predicted ambient concentrations of SO_2 at 1-hour and 3-hour averaging periods were compared to AAQS. Representative background concentrations were added to the modeled concentrations after modeling was conducted. The results of the AAQS analysis demonstrate that Mill-wide SO_2 emissions do not cause an AAQS violation.

5.3.2 South Carolina Standard No. 8 Results

Model-predicted ambient concentrations of TRS (as H_2S) and H_2S at a 24-hour averaging period were compared to respective MAAC. The results of the air dispersion modeling analysis demonstrate that Mill-wide TRS (as H_2S) and H_2S emissions do not cause any MAAC violations.

Table 5-6

Summary of Air Dispersion Modeling Results

Pollutant	Averaging Period[1]	Rank	Modeled Concentration ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total ($\mu g/m^3$)	AAQS/ MAAC/ Action Level ($\mu g/m^3$)[2]	Compliant (Y/N)
SO_2	1-hour	4th-High Average Daily Maximum	141.16	2.6	143.76	196	Y
	3-hour	1st-High	182.89	3.8	186.69	1,300	Y
H_2S	24-hour	1st-High	14.26	-	14.26	140	Y
	30-minute	1st-High	73.28	-	73.28	837	Y
TRS	24-hour	1st-High	52.17	-	52.17	140	Y
	30-minute	1st-High	383.94	-	383.94	837	Y

1 H_2S and TRS 1st highest 1-hour modeled concentrations compared to 30-minute U.S. EPA Action Levels.

2 TRS is not subject to a MAAC. For the purpose of this analysis, TRS as H_2S is evaluated using the H_2S MAAC.

Spatial representation of model-predicted ambient concentrations are provided in Figure 5-4, Figure 5-5, Figure 5-6, Figure 5-7, Figure 5-8, and Figure 5-9. Background concentrations were not included in the concentration contour plots, as they were added post-model.