



New-Indy Catawba LLC
P.O. Box 7
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Catawba, SC 29704

SENT VIA ELECTRONIC MAIL

January 16, 2023

Denis B. Kler
U.S. Environmental Protection Agency (U.S. EPA), Region 4
Enforcement and Compliance Assurance Division
Policy, Oversight and Liaison Office
61 Forsyth Street, S.W.
Atlanta, GA 30303
Kler.Denis@epa.gov

Re: New-Indy Catawba LLC Consent Order Response to Appendix A Condition IV

Mr. Kler:

New-Indy Catawba LLC (New-Indy Catawba) owns and operates a pulp and paper mill in Catawba, SC (Mill). The installation of the new cover and carbon filtration system on the Post Aeration Tank was completed on June 29, 2022. As required by Condition IV.c.i, New -Indy Catawba is submitting this information regarding this new installation.

Condition IV.

- c. Upon completion of installing the cover and carbon filtration system on the Post Aeration Tank, Defendant shall:
 - i. Provide a completion report, within 30 days, describing the cover and carbon filtration system on the Post Aeration Tank, including how New-Indy will monitor and change out the filtration media to ensure that breakthrough does not occur,
 - ii. Monitor, on a weekly basis, the VOC outlet concentration of the filtration system, using Scentroid TR8+ Pollutracker monitor to ensure the filtration system is operating effectively. New Indy must follow manufacturers maintenance, operations, and calibration requirements for the Scentroid TR8+ Pollutracker monitor;
 - iii. Change out the filtration media before it reaches its breakthrough point, defined as 500 ppm total VOC above background, and
 - iv. Maintain records of the weekly VOC monitoring and records of any filtration media change-outs, and make such records available to the EPA upon request.

Response:

IV.c.i: The completion of the Post Aeration Bason cover and filtration system was submitted by New-Indy Catawba LLC to you on July 28, 2022 which completed the Consent requirement for item IV.c.i. Having now completed over 6 months of operating time on the permanent system, New-Indy is submitting this update for items IV.c.ii-iv (VOC monitoring, filter media change plan, and recordkeeping).

IV.c.ii & iv: As required by the Consent, New-Indy has monitored VOC's on a weekly basis since before the Consent became effective on November 16, 2022. Prior to the effective Consent date, New Indy Catawba experienced a failure for both the primary and backup Scentroid TR8+ Pollutracker instruments. While awaiting repairs from the manufacturer, New Indy Catawba used a Method 21 compatible PID instrument to check and track VOC concentrations. The data is shown in the attached Table 1, complete with which instrument was being used for the VOC monitoring. As can be seen in the Table 1, the repaired Scentroid units continue to show an appreciably lower concentration for VOC's in comparison to the PID instrument. That said, even the higher readings from the PID instrument consistently run at or below 0.10% of the allowable 500 ppm limit. The data clearly shows that not only are the VOC concentrations exceptionally low entering the filtration unit, the unit is effective at reducing even that low level of VOC's.

While the Scentroid unit had indicated great potential, the unit appears to not be quite as sensitive as the PID instrument. Furthermore, service from Scentroid was a serious challenge in getting the units repaired and returned in a timely manner. Given these two facts, New-Indy Catawba would like to switch over to using a PID instrument which is much more readily available from various manufacturers. If EPA will allow this adjustment, New-Indy Catawba's strategy would be to use PID instruments which are compatible with the requirements listed in section 6 of Method 21 for monitoring ambient VOC concentrations. Otherwise, there is an undesirable risk that New-Indy will be able to reliably provide the data.

IV.c.iii: The initial filter media change out plan proposed by New-Indy Catawba was based on experience with a much smaller rental unit, and that experience included times when the presence of hydrogen sulfide was more noticeably present than it has been since September of 2021. Consequently, New-Indy Catawba proposed to change the filter media either once quarterly or whenever the filter's discharge VOC levels exceeded 100 ppm above background (only 20% of the allowable 500 ppm). The to-date VOC monitoring data demonstrates that the cleaner ambient environment around the Post Aeration Basin and the larger size of the permanent filtration unit makes the new system much more effective than had been anticipated, and media change out has not been required to-date.

Consequently, New-Indy shall change the media filtration change plan to the following criteria:

- A) VOC's at the filter discharge increase to greater than 100 ppm above background, or
- B) If Criteria A has not been reached within 12 months, the media will be changed proactively, or
- C) Should there arise some other compelling reason to change earlier than a 12-month cycle (downtime schedules, media availability, etc.), then New-Indy Catawba will change the media earlier than the 12-month run time.

Sincerely,



Tony Hobson
Senior Vice President of Strategic Planning and Kraft Operations

TABLE 1 – Weekly VOC Check Data

Post Aeration Basin Weekly Check - VOC's									
Allowable Limit:	500	ppm					parts per million data		
	calculated	manual entry	manual entry	calculated		manual entry	calculated		
	Actual vs Limit	Discharge Conc.	Inlet Conc.	In - Out	MONITOR Used	Comments	Discharge Conc.	Inlet Conc.	In - Out
Date	%	ppb	ppb	ppb			ppm	ppm	ppm
11 / 04 / 2022	0.10 %	507	935	428	PID	PID monitor, waiting for TR8+ return from OEM	0.51	0.94	0.43
11 / 10 / 2022	0.07 %	363	401	38	PID	PID monitor, waiting for TR8+ return from OEM	0.36	0.40	0.04
11 / 18 / 2022	0.02 %	100	170	70	PID	PID monitor, waiting for TR8+ return from OEM	0.10	0.17	0.07
11 / 23 / 2022	0.03 %	141	233	92	PID	First measurement since TR8+ was returned. TR8+ showing different	0.14	0.23	0.09
11 / 23 / 2022	0.00 %	0	0	0	TR8+	First measurement since TR8+ was returned. TR8+ showing different	0.00	0.00	0.00
12 / 02 / 2022	0.03 %	155	202	47	PID	PID monitor, waiting for TR8+ return from OEM	0.16	0.20	0.05
12 / 09 / 2022	0.00 %	0	0	0	TR8+	TR8+ PT022201 (value in ppm not ppb)	0.00	0.00	0.00
12 / 13 / 2022	0.00 %	0	0	0	TR8+	TR8+ PT022201 (value in ppm not ppb)	0.00	0.00	0.00
12 / 21 / 2022	0.00 %	0	0	0	TR8+	TR8+ PT022201 (value in ppm not ppb) Teddy Smith	0.00	0.00	0.00
12 / 30 / 2022	0.00 %	0	0	0	TR8+	TR8+ PT022201 (value in ppm not ppb) Teddy Smith	0.00	0.00	0.00
01 / 05 / 2023	0.00 %	0	0	0	TR8+	TR8+ PT022201 (value in ppm not ppb) Teddy Smith	0.00	0.00	0.00

Media Changes: No changes since project completion on June 29, 2020.