



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY**

**REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270-2102**

June 25, 2021

C. Brandon Ayers  
Sr. Environmental Engineer  
Domtar A.W. LLC - Ashdown Mill  
285 Highway 71 South  
Ashdown, AR 71822  
brandon.ayers@domtar.com

RE: Domtar A.W. LLC-Ashdown, AR Mill - 40 Code of Federal Regulations (CFR) Part 63  
Subpart S - Alternative Monitoring Plan Request - Change Inspection Frequency from  
Every Thirty Days to Each Calendar Month

Dear Mr. Ayers:

This letter is in response to your AMP request dated February 17, 2021, for the closure mechanisms, closed vent systems, and closed-collection systems that are subject to requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart S, and located at the Ashdown Mill in Ashdown, Arkansas. The AMP request included a proposed change to inspection frequencies in order to provide flexibility for actual mill operations and trained employee scheduling of required inspections. Based upon review of information provided, the United States Environmental Protection Agency ("EPA") conditionally approves your request, as delineated in the enclosure to this letter.

This conditional approval is based upon prior consultation with our Office of Air Quality Planning and Standards and our Office of Enforcement and Compliance Assurance, and is consistent with similar approvals issued by other regions. If you have any questions concerning this response, please contact Ben Rosenthal of my staff at (214) 665-6453 or rosenthal.benjamin@epa.gov.

Sincerely,

STEVEN THOMPSON

Digitally signed by STEVEN THOMPSON  
DN: cn=US, o=U.S. Government, ou=Environmental  
Protection Agency, cn=STEVEN THOMPSON,  
c=US, 2.5.4.2.19200000.100.1.1=6601000652657  
Date: 2021.06.25 08:38:18 -0500

Steve Thompson  
Branch Chief  
Air Enforcement Branch

Enclosure

Ee: Bill Schrock, EPA OAQPS (schrock.bill@epa.gov)  
Sarah Ayres, EPA OECA (ayres.sarah@epa.gov)  
Heinz Braun, Arkansas Department of Environmental Quality (braun@adeq.state.ar.us)

## ENCLOSURE

### **Domtar A.W. LLC - Ashdown Mill, Ashdown, Arkansas Alternative Monitoring Plan (AMP) NESHAP Subpart S**

Domtar A.W. LLC ("Domtar") submitted information pertaining to their closed collection systems, closed vent systems, and closure mechanisms at the Ashdown Mill in Ashdown, Arkansas. The AMP includes a proposed change to inspection frequencies in order to provide flexibility for actual mill operations and trained employee scheduling of required inspections.

The General Provisions of 40 CFR Part 63 provide for approval of minor modifications to monitoring requirements at 40 CFR § 63.8(b)(1)(i), if the modification does not decrease the stringency of the relevant regulation or is site-specific, and is made to reflect or accommodate the operational characteristics, physical constraints, or safety concerns of the facility.

Under the provisions of 40 CFR §§ 63.453(k)(1) and (k)(5), inspections are to be performed "*at least once every 30 days*". Under the provisions of 40 CFR §§ 63.453(k)(2) and 63.453(1)(1), inspections are to be conducted "*every 30 days*". Domtar specifically proposes a change to the fixed 30-day frequency for inspections required for the closed-collection systems subject to 40 CFR §§ 63.453(k) and (1). Mill employees normally work 5-day weeks and the required 30-day inspections may fall on weekends or holiday periods when the mill has fewer personnel available to perform the required visual inspections. Moreover, individual employees trained to conduct the visual inspections may be unavailable during this time or have scheduled time off. Therefore, Domtar has proposed that required inspections occur once each calendar month, with at least 21 days elapsed time between inspections.

Domtar's proposal to conduct inspections once per calendar month with at least 21 days between inspections will allow more flexibility, without impact on the stringency of the standard. Therefore, EPA can approve Domtar's request to conduct inspections each calendar month rather than every thirty days. For each applicable inspection requirement in 40 CFR §§ 63.453(k) and (1) that currently must be conducted every 30 days, your required inspection frequency shall now be once per calendar month, with no less than 21 calendar days elapsed between inspections.

This approval is subject to the following conditions:

- 1) The Domtar Ashdown Mill shall provide EPA with a copy of the revised site-specific monitoring plan at least 30 days before changing from the current regulatory monitoring requirements of 40 CFR §§ 63.453(k) and 63.453(1). The revised plan will incorporate the approved alternative monitoring provisions outlined in this response. Please submit this information electronically to Ben Rosenthal at [rosenthal.benjamin@epa.gov](mailto:rosenthal.benjamin@epa.gov); and,
- 2) The Domtar Ashdown Mill shall continue to satisfy all other applicable monitoring requirements found in 40 CFR §§ 63.453(k) and 63.453(1).

Finally, as provided at 40 CFR § 63.8(f)(3), EPA may require the use of another specified monitoring method, requirement, or procedure if EPA finds reasonable grounds to dispute the justification provided for any exemption or any results obtained under this approved alternative monitoring method.