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August 27, 2021

Manager, Air Toxics Section  
South Carolina Department of Health and Environmental Control  
Bureau of Air Quality  
2600 Bull Street  
Columbia, South Carolina 29201

Director, Air, Pesticides, and Toxic Management Division  
EPA Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-3104

Re: Notification of Compliance Status and Initial Performance Test Report  
40 CFR Part 63, Subpart S  
New-Indy Catawba LLC  
Title V Air Permit No. TV-2440-0005  
Catawba, South Carolina 29704

Dear Sir/Madam:

Pursuant to the requirements of 40 CFR Part 63, Subpart S, National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry, the New-Indy Catawba LLC (New-Indy Catawba) Mill located in Catawba, South Carolina (Mill) is hereby providing a Notification of Compliance Status (NOCS) to update the Mill's compliance approach with the Subpart S requirements for pulping condensates and report the results of the recent Initial Performance Test (IPT) conducted to demonstrate compliance with the pulping condensate collection and treatment requirements at 40 CFR §63.446.

In the Fall of 2020, the Mill was converted from manufacturing bleached paper grades (lightweight coated paper and market pulp) to manufacturing unbleached or brown paper (linerboard and market pulp). Concurrent with this conversion, the Mill installed a hard pipe from the foul condensate collection tank directly to the Mill's aerated stabilization basin (ASB), for the purpose of using the ASB to treat the foul condensates to comply with 40 CFR Part 63, Subpart S. No other physical changes were made to the ASB, with the exception of planned dredging activities, which are still underway. The new hard pipe discharges the foul condensates below the liquid surface of the existing ASB per 40 CFR §63.446(e)(2) to allow for biological treatment of the hazardous air pollutants (HAPs) present in the condensates, primarily methanol. The Mill is also

operating its Steam Stripper for purposes of treating foul condensate to comply with Subpart S; flow to the Steam Stripper is currently being maximized, with the remaining condensate flow being directed to the ASB via the hardpipe for treatment. Subpart S provides options for condensate collection and treatment; the Mill has chosen to comply with the following requirements, using both the existing Steam Stripper and the ASB for treatment:

- The Mill collects a minimum of 7.2 pounds of hazardous air pollutants (HAP) per oven-dried ton of pulp (lb HAP/ODTP) per 40 CFR §63.446(c)(3); and
- The Mill treats a minimum of 6.6 lb HAP/ton ODTP in the Steam Stripper and ASB (combined) per 40 CFR §63.446(e)(4).

New-Indy Catawba conducted a new compliance demonstration (attached) for the requirements of 40 CFR §63.446(c) and (e) (kraft pulping process condensates) within 180 days of startup of the unbleached kraft pulping system. The Mill conducted the IPT from June 23 to July 11, 2021. A description of the affected units and the details of the testing methodology and data gathered are contained in the attached report. The results of the testing are included in Table 2-9 of the attached report and show that the Mill is meeting both the collection and treatment requirements. Section 2.5 of the attached report details the Mill's approach to demonstrating continuous compliance with the condensate collection and treatment requirements. Table 1 below summarizes the locations within the attached IPT report where the requirements of 40 CFR §63.9(h)(2)(i) are met.

**Table 1**  
**NOCS Requirements of 40 CFR §63.9(h)(2)(i)**

<b>40 CFR §63.9(h)(2)(i)...</b>	<b>IPT Report Document Section Number(s)</b>
(A) The methods that were used to determine compliance;	Section 2.1
(B) The results of any performance tests, opacity or visible emissions observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;	Section 2.1, Section 2.4, Appendix E (CMS verifications)
(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;	Section 2.5
(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standards;	Section 2.4

**Table 1**  
**NOCS Requirements of 40 CFR §63.9(h)(2)(i)**

40 CFR §63.9(h)(2)(i)...	IPT Report Document Section Number(s)
(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);	The Mill is a major source
(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and	Sections 2.1, 2.4
(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.	Herein; Section 2.4

**CERTIFICATION STATEMENT**

I certify that based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this submittal are true, accurate, and complete.

Charles Cleveland  
Name of Responsible Official

Technical Manager  
Title

27-Aug-2021  
Date



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Signature of Responsible Official