



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 14 2003

OFFICE OF
AIR AND RADIATION

Larry T. Price
General Manager
St. Laurent Paperboard (US), Inc.
19th and Main Streets
P. O. Box 100
West Point, VA 23181

Re: Petition to Use a Default Moisture Value for Periods of Residual Oil Firing, for
West Point Paper Mill (Facility ID (ORISPL) 010017)

Dear Mr. Price:

This is in response to your February 19, 2003 petition under § 75.66 (a) in which St. Laurent Paperboard (US), Inc. (St. Laurent) requested permission to use a default moisture value of 6.0% H₂O for periods in which residual oil is fired in Power Boiler No. 8 at the West Point, Virginia mill. EPA approves the petition, for the reasons discussed below.

Background

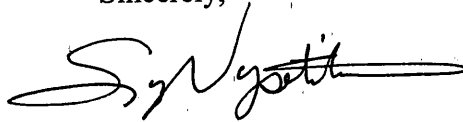
St. Laurent owns and operates a coal-fired boiler, known as Boiler No. 8, at its West Point, Virginia facility. Boiler No. 8 burns principally coal, but occasionally residual oil is combusted in the unit, either alone or in combination with coal. The boiler is an affected unit under the NO_x Budget Trading program, as specified in 9 VAC Chapter 140, Article 8.

To meet the NO_x mass emission and heat input reporting requirements of the NO_x Budget Trading Program for Boiler No. 8, St. Laurent will continuously monitor NO_x emission rate using dry-basis NO_x and O₂ monitors and will use a stack flow monitor in conjunction with the O₂ monitor to measure the hourly unit heat input rate. Since the O₂ monitor measures on a dry basis and the stack flow rate is measured on a wet basis, a moisture correction term is needed in the heat input rate equation (Equation F-18 in Appendix F of 40 CFR Part 75). When moisture corrections are necessary, Part 75 requires the owner or operator to either install and certify a continuous moisture monitoring system or to use a constant, default moisture value. For bituminous coal combustion, § 75.11(b) specifies a default moisture value of 6.0% H₂O.

If Boiler No. 8 combusted only bituminous coal, the default moisture value of 6.0% H₂O could be used without a special petition. However, since the unit sometimes burns residual oil

questions or concerns about this matter, please contact Robert Vollaro of my staff at (202) 564-9116. Thank you for your continued cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Napolitano", with a long horizontal flourish extending to the right.

Sam Napolitano, Acting Director
Clean Air Markets Division

cc: Renee McLaughlin, EPA Region III
Chris Bednar, Virginia DEQ
Robert Vollaro, EPA, CAMD