



March 31, 2016

U.S. Environmental Protection Agency  
EPA Docket Center  
Docket: EPA-HQ-OAR-2014-0464  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

FILED VIA U.S. MAIL AND EMAIL

RE: **Docket ID No. EPA-HQ-OAR-2014-0464**  
Comments to EPA Recommendation for SO<sub>2</sub> NAAQS Designation  
LDEQ Agency Interest No. 328

Dear Sir or Madam:

These comments are submitted by the Louisiana Pulp & Paper Association (“LPPA”) and concern designations by the U.S. Environmental Protection Agency (“EPA”) for the 1-hour sulfur dioxide (“SO<sub>2</sub>”) national ambient air quality standard (“NAAQS”) in Louisiana.<sup>1</sup> These comments specifically relate to the SO<sub>2</sub> NAAQS final designation for the DeSoto Parish area.

LPPA has become aware of EPA’s proposal to designate a portion of DeSoto Parish, Louisiana as nonattainment with the 1-hour SO<sub>2</sub> NAAQS. *See*, Letter from Ron Curry to Gov. John Bel Edwards, dated Feb. 11, 2016, attaching *Technical Analysis for the DeSoto Parish, Louisiana Area* (“*Technical Analysis for DeSoto*”), pp. 6-19. As discussed in this letter, EPA intends to modify a recommendation of “attainment” by the Louisiana Department of Environmental Quality (“LDEQ”) for this geographic area. EPA also intends to include a paper mill located in Mansfield, Louisiana in the nonattainment area within DeSoto Parish in addition to a coal-fired utility.

EPA seeks to include International Paper’s Mansfield Mill in the proposed nonattainment area within DeSoto Parish despite the fact that modeling analyses submitted by the Sierra Club and the LDEQ did *not* include SO<sub>2</sub> emissions from the paper mill. Thus, EPA has no scientific or technical basis to conclude that the paper mill contributes to concentration gradients near those caused by the coal-fired utility. For this reason, LPPA encourages EPA to make a final designation based solely on the information that has been presented to it, including any supplemental information submitted as a part of this public comment period.

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<sup>1</sup> The LPPA is a nonprofit Louisiana corporation that includes seven member companies located at eight pulp and paper mills in Louisiana.

It is our understanding that International Paper and the LDEQ have submitted (or will submit) comments to EPA related to the SO<sub>2</sub> NAAQS designation for DeSoto Parish and that these comments may include a higher quality air modeling analysis than what was previously submitted by the Sierra Club. LPPA urges EPA to closely review the supplemental modeling. If the modeling demonstrates that SO<sub>2</sub> emissions from the paper mill have a *de minimis* impact to any modeled exceedances of the SO<sub>2</sub> NAAQS for this area, EPA should unquestionably exclude the paper mill from the final nonattainment area. There is no legal basis to include a stationary source in a nonattainment area simply because it emits above a certain threshold. In fact, this is the very reason air modeling is used by EPA and states to determine which geographic areas should be included within a particular boundary. If other modeling supports a designation of attainment for the entire parish, then LPPA urges EPA to accept LDEQ's initial recommendation for this area by July 2, 2016.

Finally, LPPA urges EPA to make the final designation based solely on what is in the administrative record on or before its court-ordered deadline. Based on current information, it is arbitrary and capricious for EPA to include International Paper's Mansfield Mill in the proposed nonattainment area for DeSoto Parish. EPA made several conclusory statements within the technical analysis concerning the paper mill. For example, despite Sierra Club's failure to include the paper mill in its modeling, EPA concluded that "it is likely that the source causes concentration gradients that extend to area impacted by Dolet Hills with some of the higher modeled values that are near the standard." *Technical Analysis for DeSoto*, p. 10. EPA's analysis further states that the "[i]nclusion of IP emissions may likely increase modeled values just below the standard to exceedance levels." *Id.*, p. 12. EPA's decision to include or not include the paper mill in a nonattainment area should not be based on conjecture or speculation. Rather, such a weighty and impactful decision should be based on data that is known and that has been closely evaluated and critiqued by the state and federal agencies.

For these reasons, LPPA requests that EPA *exclude* International Paper's Mansfield Mill from any nonattainment area in DeSoto Parish. LPPA further encourages EPA to consider data that supports an attainment designation for this area. Finally, EPA should base its final decision strictly on information that is known to it and has been included in the administrative record.

If you have any questions concerning these comments, I can be reached at (225)336-845.

Very truly yours,



Kyle B. Beall