

IN THE MATTER
WESTVACO CORPORATION

* BEFORE THE MARYLAND
* STATE DEPARTMENT OF
* HEALTH AND MENTAL
* HYGIENE

CONSENT ORDER

1. Starting in 1975 the Department of Health and Mental Hygiene of the State of Maryland (the "Department"), entered into a series of related Consent Orders with Westvaco Corporation (the "Company"), concerning the sulfur dioxide emissions of the Company's facility located in Luke, Maryland.
2. The Consent Orders were submitted to the U.S. Environmental Protection Agency ("EPA"), as proposed amendments to the Maryland State Implementation Plan ("SIP"), on July 16, 1975, November 18, 1977 and June 15, 1979 respectively.
3. On April 25, 1980, 45 FR 27933, EPA approved the Consent Orders as a revision of the Maryland State Implementation Plan.
4. The Consent Orders, specifically Paragraph 2 of the 1977 Order and Paragraph 1 of the 1979 Order, provided for an interim emission limitation which would be effective until a permanent emission limitation was determined based on a two-year monitoring and model validation program specified in the Orders.
5. The monitoring and model validation program was completed on schedule. Extensive amounts of meteorological and sulfur dioxide monitoring data were collected. No violations of National Ambient Air Quality Standards were ever measured. A diffusion analysis satisfactory to the Department and EPA has been submitted by the Company. The analysis shows that the Luke facility will meet all National Ambient Air Quality

Standards for sulfur dioxide when operated with an emission limitation of 66 tons per day and up to 17.6 tons per three-hour period.

6. COMAR 10.18.09.07A(1)(a) establishes a sulfur dioxide emission limitation of 3.5 lbs/MM BTU. The Department has determined that the emission standard in Paragraph 1 of this Order is equivalent.

ORDER

1. Sulfur dioxide emissions from all fuel burning equipment at the Luke facility may not exceed:
 - a) 66 tons per day as calculated from midnight to midnight.
 - b) For each three-hour period (calculated as block averages), a range of 9.4 tons at 50% buoyancy to 17.6 tons at 100% buoyancy, represented by a curve defined as follows:

$$Y = -11.16 X^2 + 33.14 X - 4.38$$

where

X = fractional plume buoyancy (0.5 to 1.0)

and

Y = emission limit (ton/3 hours)

For purposes of control and reporting, combined boiler load and buoyancy are considered directly proportional.

2. A continuous in-stack monitoring system approved by the Department shall be provided and operated by the Company to determine compliance with the emission standard in Paragraph 1 of this Order.
3. A quarterly report shall be submitted to the Department ten days after the end of each calendar quarter summarizing the data collected by the continuous in-stack monitoring system.
4. Annual operating permits for the Company's fuel burning equipment will be issued by the Department provided that

Company complies with the requirements of this Order and other requirements applicable to the equipment.

5. This Order supersedes the previous Orders issued by the Department on July 6, 1975, October 21, 1977 and June 12, 1979.

September 6, 1983
Date

George Plummer
Director of Air Management
Administration
Department of Health and
Mental Hygiene

The above Order is agreed to and the written conditions consented to.

Westvaco Corporation

6/30/83
Date

Harold A. Sutphen
By: Senior Vice President

IN THE MATTER OF
WESTVACO CORPORATION

BEFORE THE MARYLAND STATE
DEPARTMENT OF HEALTH AND
MENTAL HYGIENE

* * * * *

AMENDED CONSENT ORDER

On September 6, 1983, the Department of Health and Mental Hygiene of the State of Maryland (the "Department") entered into a Consent Order with the Westvaco Corporation (the "Company"), concerning the sulfur dioxide emissions of the Company's facility located in Luke, Maryland.

After consultations following final execution of the Order, the parties agreed that the maximum three-hour emission limit established in the Order should be adjusted to reflect the Company's commitment not to exceed certain emission levels.

ORDER

Therefore, it is hereby ORDERED this 26th day of January, that:

1. The Consent Order between the Department and the Company, dated September 6, 1983, concerning the Company's sulfur dioxide emissions from its Luke, Maryland facility is hereby amended by restating paragraph 1.b) as follows:

b) For each three-hour period (calculated as block averages), a range of 9.4 tons at 50% buoyancy to 17.0 tons at 100% buoyancy, represented by a curve defined as follows:

$$Y = -16.0 x^2 + 39.2 x - 6.2$$

where

x = fractional plume buoyancy (0.5 to 1.0)

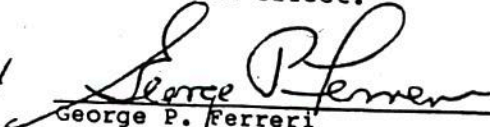
and

y = emission limit (tons/3 hours)


For purposes of control and reporting, combined boiler load and buoyancy are considered directly proportional.

5

2. Except as herein amended, the provisions, terms and conditions of the Consent Order dated September 6, 1983 are hereby reaffirmed and remain in full force and effect.

Date January 26, 1984 
George P. Ferreri
Director
Air Management Administration

The above Order is agreed to and the written conditions consented to.


Westvaco Corporation
Date January 20, 1984
By: Harold Sutphen
Senior Vice President 