

Domtar
Nekoosa Mill
301 Point Basse Avenue
Nekoosa, WI 54457-1422
Tel. : (715) 886-7785
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September 30, 2014

U.S. Environmental Protection Agency-Region 6
Attn: Dayana Medina
1445 Ross Avenue #1200
Dallas, TX 75202-2733

SUBJECT:

Domtar A.W. LLC's Response to Request to Provide Information Pursuant to the Clean Air Act dated June 4, 2014

Dear Ms. Medina:

In response to your voicemail to me on September 5, 2014, enclosed is additional information related to the operation of the existing SO₂ scrubber at an average 90% SO₂ removal for Power Boiler 2. As noted in the response, the Ashdown Mill was on shutdown during September. Engineering staff were fully occupied with the mill shutdown maintenance activities and did not have time to assist. Thus, the information represents a preliminary estimate of costs.

Domtar is interested in scheduling a time when we can discuss BART for the Ashdown Mill. If you could provide me with a list of potential dates, that would be appreciated

Sincerely,



Annabeth Reitter
Corporate Manager, Environmental Regulation

Enclosures

cc: Mark A. Thimke, Foley & Lardner LLP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

IN THE MATTER OF:

Domtar A.W. LLC
Domtar Ashdown Mill
285 Highway 71 South
Ashdown, AR 71822

**SUPPLEMENTAL RESPONSE OF
DOMTAR A.W. LLC TO
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY'S
CLEAN AIR ACT SECTION 114(A) INFORMATION REQUEST**

September 30, 2014

Domtar A.W. LLC ("Domtar") prepared the following responses to the United States Environmental Protection Agency's ("U.S. EPA") questions raised during an August 21, 2014 webinar presentation and follow-up discussion of the answers provided on July 9, July 21, and August 15, 2014, in response to the Clean Air Act, Section 114(a) Information Request dated June 4, 2014 ("Information Request") regarding Domtar's facility at 285 Highway 71 South, Ashdown, Arkansas (hereinafter referred to as the "Ashdown Mill").

General Objections

Domtar's objections are made without in any way waiving or intending to waive but, on the contrary, preserving and intending to preserve:

- (a) all questions and/or objections as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the responses or subject matter thereof, in any subsequent proceeding involving Domtar;
- (b) the right to object on any ground to the use of these responses or the subject matter thereof in any subsequent proceeding involving Domtar; and
- (c) the right to object on any ground at any time to other requests or discovery procedures involving or relating to the subject of these responses.

Domtar has a corporate document retention program that limits the availability of older records and information. These responses are based on, and therefore necessarily limited by, the records and information still in existence, presently recollected, and thus far discovered in

the course of preparing these responses. Domtar reserves the right to supplement and make any changes to these responses if it appears at any time that omissions or errors have been made or that more accurate information is available.

Domtar has not included in this response copies of any attorney/client privilege or attorney work product doctrine documents protected by such privileges. All responses were prepared with the assistance and advice of counsel and such discussions are covered by attorney/client and attorney work product privileges.

SUPPLEMENTAL RESPONSE

SUPPLEMENTAL REQUEST 13: *Operating costs associated with additional caustic to Power Boiler 2 scrubber – 90% removal.*

Response: The U.S. EPA requested additional information on the operation of the caustic scrubber controls used to reduce SO₂ emissions from Power Boiler 2. As previously noted, the Ashdown Mill was in a maintenance shutdown mode for most of September and is now beginning the startup process. During a maintenance shutdown and mill startup, mill engineering and operating personnel are not available for other tasks due to the time-consuming and time-sensitive nature of the work. Also, the Ashdown Mill was not able to retain outside experts to assist in preparing the cost assessment given the limited internal resources.

Cost information relating to the increased use of the scrubber for SO₂ control was compiled and is attached as ASHDOWN MILL-Supp13-000001. It is not a detailed cost estimate, and due to the shutdown, input from engineering staff was limited. Thus, this is a high level, preliminary engineering estimate.

AS TO OBJECTIONS:

FOLEY & LARDNER LLP

Dated: September 30, 2014

By 
Mark A. Thimke
Attorney for Domtar Corporation

P.O. ADDRESS:

777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
414-297-5832
mthimke@foley.com

AFFIDAVIT OF ANNABETH REITTER

STATE OF WISCONSIN)
) ss.
COUNTY OF WOOD)

Annabeth Reitter, being first duly sworn on oath, states as follows:

- (1) I am Corporate Manager, Environmental Regulation for Domtar Corporation ("Domtar") located at 301 Pointe Basse Avenue, Nekoosa, Wisconsin 54457.
- (2) I make this affidavit in support of Domtar's response to the additional questions raised by the United States Environmental Protection Agency ("U.S. EPA") pursuant to Section 114 of the Clean Air Act for information regarding Domtar's Ashdown, Arkansas mill dated June 4, 2014, and received by Domtar on June 9, 2014 (the "Response").
- (3) The objections asserted in the Response are authorized by Domtar.
- (4) Domtar has completed a diligent record search and a diligent interviewing process with employees who may have relevant knowledge of the operations and activities at the Ashdown mill that are the subject of the Response.
- (5) To the best of my knowledge, based upon the information currently available to Domtar and subject to the objections asserted in the Response, this Response is true, correct and accurate. Domtar reserves the right to revise, amend and/or update the Response in the future if Domtar obtains additional relevant or responsive information.

Annabeth Reitter
Corporate Manager, Environmental Regulation

Subscribed and sworn to before me
this ____ day of September, 2014

NOTARY PUBLIC, State of Wisconsin
My Commission is/expires: _____

Operating expenses:

Maximum Month (2011-2013)

12.72 TPD SO2 Loading

11.448 =90% removal requirement

22896 =lbs NaOH per lb SO2 to be removed / day*

*(2013 Lundberg estimate of 1 lb NaOH per lb of SO2 removal)

\$	5,472.14	/day	@	\$	0.24	/lb NaOH	(5-Year Avg NaOH pricing)
\$	1,942,611.12	/year					

Conversion:

2.04 lb NaOH / gallon of 20% solution

Waste water treatment cost

3,984,353 gallons / year

\$	0.22	/k gallon	(2014 budget)
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\$	856.64	/year
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Raw water treatment cost

3,984,353 gallons / year

\$	270.17	/MMGal	(2014 budget)
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\$	1,076.45	/year
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Energy cost

25 hp/pump

50 hp (2 pumps)

37.3 kW (1hp = 0.746kW)

\$	15,889.80	/year	@	0.05	\$/kWh	(Arkansas Industrial Energy Clearinghouse)
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\$	1,960,434.01	/year additional cost for 90% removal average
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The NaOH pricing is based on a 5-year average for Ashdown

Wastewater and raw water costs are based on estimated additional gallons from the NaOH and 2014 budget costs.

The energy costs are an estimate assuming two new ~50 gpm pumps (Engineering estimated capital expense to be approximately

\$200,000 for 2 pumps, piping and electrical).

Capital expenses:

Pump Upgrade (2 pumps, one for each scrubber system)

~ \$ 200,000.00