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April 21, 2017

William K. Montgomery, Policy & Planning Branch Manager
Arkansas Department of Environmental Quality
Office of Air Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: *Domtar A.W. LLC*
New CALPUFF Modeling Scenarios to Support BART FIP Alternative Options

Dear Mr. Montgomery:

During the conference call on Monday, April 17, 2017, ADEQ staff requested additional CALPUFF modeling for scenarios showing a visibility improvement comparable to or better than the value presented in the final FIP: 0.139 Δ dv. Per the request, Domtar is providing modeling files (attached via electronic mail with this letter) for four scenarios:

- Revised Baseline Scenario – Power Boiler No. 1 on natural gas only and Power Boiler No. 2 at baseline rates for SO₂ and PM and BART FIP rate for NO_x.
- BART Alternate Scenario 1 – Power Boiler No. 1 Shutdown and Power Boiler No. 2 at baseline rates for SO₂ and PM and BART FIP rate for NO_x.
- BART Alternate Scenario 2 – Power Boiler No. 1 on natural gas only and Power Boiler No. 2 at baseline rate for PM and reduced emission rates for SO₂ and NO_x. Compared to the final BART FIP emission rates, this scenario further decreases NO_x emissions in favor of increased SO₂ emissions.
- BART Alternate Scenario 3 – Power Boiler No. 1 on natural gas only and Power Boiler No. 2 at baseline rate for PM and reduced emission rates for SO₂ and NO_x. Compared to scenario 2, this scenario decreases SO₂ emissions in favor of increased NO_x emissions.

The emission rates and modeling results associated with each of the alternate scenarios are summarized in the following table.

BART Alternate Scenario	Scenario Description / Power Boiler Status	Modeled Emission Rates			Modeled Visibility Improvement at Caney Creek (Δv)
		SO ₂ (lb/hr)	NO _x (lb/hr)	PM (lb/hr)	
1	Power Boiler No. 1 Shutdown	0	0	0	0.258
	Power Boiler No. 2 at baseline rates for SO ₂ and PM and BART FIP rate for NO _x	788.2	345	81.6	
2	Power Boiler No. 1 on natural gas only	0.5	191.1	5.2	0.140
	Power Boiler No. 2 at baseline rate for PM and reduced emission rates for SO ₂ and NO _x	435	293	81.6	
3	Power Boiler No. 1 on natural gas only	0.5	191.1	5.2	0.140
	Power Boiler No. 2 at baseline rate for PM and reduced emission rates for SO ₂ and NO _x	325	315	81.6	

Thank you for your consideration of this information. Please contact me with any questions and to set up a call or meeting to discuss any additional data needs and next steps.

Sincerely,



Kelley Crouch
Environmental Manager

cc: Annabeth Reitter, Domtar
Mark A. Thimke, Foley & Lardner LLP
Jeremy Jewell, Trinity Consultants, Inc.