



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

October 1, 2020

TRANSMITTED VIA EMAIL

Stephen Morgan
General Manager
WestRock Texas, L.P.
1913 FM 105
Evadale, TX 77615

Stephen.morgan@westrock.com

Re: Performance Testing Extension Request – WestRock Texas, L.P., Evadale, TX – Force Majeure Events - National Emission Standard for Hazardous Air Pollutants (NESHAP) - 40 Code of Federal Regulations (CFR), Part 63, Subpart A (General Provisions) and Subpart MM (Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills)

Dear Mr. Morgan,

This letter is in response to a request submitted on your behalf by Mr. Steven Black of WestRock, dated September 22, 2020, for an extension of time to conduct performance tests required by NESHAP Subpart A and Subpart MM. Per 40 CFR § 63.865, affected sources or process units subject to Subpart MM are required to conduct both initial and periodic performance tests using test methods or procedures specified within the subpart. The testing deadline is October 13, 2020.

The extension is requested due to a claim of force *majeure* events as provided in 40 CFR § 63.7(a)(4). You stated that the COVID-19 pandemic and Hurricane Laura interfered with personnel and equipment availability. You requested a thirty (30) day extension to the performance testing deadline for the 3 Recovery Furnace, 3 Smelt Dissolving Tank, 1 Lime Kiln, and 7 Lime Kiln, setting a new deadline of November 12, 2020.

Based upon a review of all available information that you have submitted, the United States Environmental Protection Agency (EPA) grants your request for a thirty (30) day extension. Pursuant to 40 CFR 63.7(a), EPA approves a thirty (30) day extension to the performance testing requirements of 40 CFR Subpart A and Subpart MM for the 3 Recovery Furnace, 3 Smelt Dissolving Tank, 1 Lime Kiln, and 7 Lime Kiln. The performance tests must be performed no later than November 12, 2020.

Please coordinate with the Texas Commission on Environmental Quality (TCEQ) to complete the performance testing based on the previously submitted testing protocol. If you have any questions concerning this extension approval, please contact Mr. Justin Chen of my staff at 214-665-2273, or by email at chen.justin@epa.gov.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
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Date: 2020.10.01 09:23:16 -0500

Steve Thompson
Chief
Air Enforcement Branch

Ecc: Sarah Kirsey, TCEQ, Sarah.Kirksey@tceq.texas.gov
Steven Black, WestRock Texas, L.P., steven.black@westrock.com