



ASSISTANT ADMINISTRATOR FOR AIR AND RADIATION

WASHINGTON, D.C. 20460

June 21, 2026

Mr. Chris Wellman
Sr. Environmental Engineer
Clearwater Paper, Augusta Mill
4278 Mike Padgett Highway
Augusta, Georgia 30906

Dear Mr. Wellman,

I am writing in response to your November 26, 2025, letter to Daniel McCain with the Georgia Environmental Protection Division (GEPD). GEPD subsequently forwarded this letter to the U.S. Environmental Protection Agency (EPA) for review. In that letter, Clearwater Paper requests approval of an alternative test method for demonstrating compliance with 40 CFR part 63, Subpart S, *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry* (Subpart S). Clearwater Paper seeks to use NCASI Method DI/MEOH-94.03 in lieu of Method 308 (40 CFR part 63, Appendix A), as required by 40 CFR 63.457(b)(5), to determine the methanol vent gas concentrations on the No. 3 Fiberline at the Clearwater Paper - August Mill location. The EPA's Office of Air and Radiation is the delegated authority for approval determinations on any major alternatives to test methods and other compliance determination procedures required under 40 CFR parts 59, 60, 61, 63, and 65.

Based on the information provided in your letter dated November 26, 2025, the EPA approves Clearwater Paper's request to use NCASI Method DI/MEOH-94.03 as an alternative test method when measuring the methanol vent gas concentration on the No. 3 Fiberline at the August Mill location in Augusta, Georgia. A copy of this letter and the enclosures must be included in any certification test report or test plan for which this alternative test method is used for compliance with Subpart S requirements.

If there are additional questions regarding this approval, please contact Sharyn Lie at Lie.Sharyn@epa.gov.

Sincerely,

Aaron Szabo
Assistant Administrator
Office of Air and Radiation

Enclosures (2)

1. Request Letter Dated November 26, 2025
2. Details Regarding No. 3 Fiberline Screen System - Proposed Alternate Test Method and Site-Specific Test Plan: Clearwater Paper Corporation - Augusta Mill

cc: Sharyn Lie, EPA
Jake Carpenter, EPA
Kim Garnett, EPA
Gerri Garwood, EPA
Dan McCain, GEPA
Kevin McGinn, EPA

Enclosure 1 –Request Letter dated November 26, 2025

Enclosure 2 – Details Regarding No. 3 Fiberline Screen System - Proposed Alternate Test Method and Site-specific Test Plan: Clearwater Paper Corporation - Augusta Mill

Clearwater Paper recently replaced components of its screen system and now must conduct initial performance testing. The request stated that emissions from several units within the screen system cannot be accurately measured using the vent sampling requirements listed in 40 CFR part 63, Subpart S. Clearwater Paper proposed, in lieu of Method 308, to conduct liquid sampling of the vent input streams to confirm that the methanol entering the screen system is below the applicable emission threshold for hazardous air pollutant (HAP) control requirements, conservatively assuming that all HAP entering the screen system is subsequently volatilized and emitted. Subpart S allows the total HAP concentration to be measured as methanol concentration. The request proposed use of NCASI Method DI/MEOH 94.03 to measure the liquid methanol concentration.

Applicable Regulations and Relevant References

- National Emission Standards for Hazardous Air Pollutants, 40 CFR part 63, Subpart S
 - §63.443: *Standards for pulping system at kraft, soda, and semi-chemical processes*
 - Emissions threshold for HAP control requirements for screen systems - emissions of 0.2 pounds per over-dried ton of pulp (0.2 lb/ODT): §63.443(a)(1)(ii)(B).
 - §63.457: *Test methods and procedures*
 - Requirement for initial performance testing for screen systems: §63.457(a)(1).
 - Specific testing requirements for vent sampling required for systems applicable to §63.443 (and certain other NESHAP S) standards: §63.457(b).
 - Use of NCASI Method DI/MEOH-94.03 for liquid sampling to determine methanol concentrations: §63.457(c)(3)(ii).
 - Testing option to measure total HAP concentration as methanol: §63.457(f).