



## OFFICE OF AIR QUALITY PLANNING AND STANDARDS

RESEARCH TRIANGLE PARK, NC 27711

November 20, 2024

Mr. John Piotrowski  
VP, Environmental Operations  
Packaging Corporation of America  
N9090 County Road E  
Tomahawk, Wisconsin 54487

Via electronic mail: [jpiotrowski@packagingcorp.com](mailto:jpiotrowski@packagingcorp.com)

Dear Mr. Piotrowski,

Pursuant to section 114 of the Clean Air Act (CAA), 42 U.S.C. section 7414(a), the U.S. Environmental Protection Agency (EPA) is collecting information related to the EPA's upcoming reviews of the New Source Performance Standards (NSPS) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) related to the pulp and paper sector, specifically the NSPS for Kraft Pulp Mills (40 CFR part 60, subpart BB/BBa), the NESHAP for the Pulp and Paper Industry (40 CFR part 63, subpart S), and the NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR part 63, subpart MM). The EPA requires your assistance in these efforts by responding to this CAA section 114 request.

The EPA is requesting this information in order to complete reviews mandated by the CAA. CAA section 111(b)(1)(B) requires the EPA to review and, if appropriate, revise each NSPS at least every eight years. CAA section 112(d)(6) requires the EPA to review, and, if appropriate, revise each NESHAP at least every eight years, taking into account developments in practices, processes, and control technologies. The EPA is also requesting data and related information to inform the development of emissions standards for currently unregulated HAP, as required by recent judicial interpretation of the CAA (*Louisiana Environmental Action Network et al. v. EPA*, 955 F.3d 1088 (D.C. Cir. 2020)).

The current stage of information collection features a questionnaire that focuses on chemical recovery combustion sources at pulp mills. Referred to as "the subpart MM questionnaire," the questionnaire is designed to collect information concerning emissions and other relevant aspects of chemical recovery operations at kraft, sulfite, and stand-alone semichemical pulp mills, and the EPA will use the information collected to review both NESHAP subpart MM and NSPS subpart BB/BBa. In addition to the subpart MM questionnaire, the EPA intends to issue a questionnaire that focuses on non-combustion pulp and paper sources, information from which will be used to review NESHAP subpart S and NSPS subpart BB/BBa. The EPA also intends to issue emissions testing supplements for NESHAP subparts MM

and S. Information submitted to the EPA in response to the questionnaires will help inform the contents of the testing supplements.

In the current stage, the EPA is requesting information for each of the following facilities that operate emission units subject to 40 CFR part 63, subpart MM:

Survey ID	Facility Name
141	PCA - Tomahawk, WI
142	PCA - Counce, TN
143	PCA - Valdosta, GA
201	PCA - Deridder, LA
202	PCA - International Falls, MN
203	PCA - Wallula, WA
205	PCA - Jackson, AL
247	PCA - Filer City, MI

Six enclosures accompany this request. **Enclosure 1** contains criteria and instructions for exempting mills from this survey. **Enclosure 2** contains the questionnaire and instructions for completing and submitting your response to our inquiry. We have created a Microsoft® Excel® answer file for your questionnaire response, which is attached to this letter. **Enclosures 3** through **6** provide supplemental information.

Please note that emissions data provided under section 114 of the CAA are not entitled to confidential treatment under 40 CFR Part 2.<sup>1</sup> If there is any information related to facility operations other than emissions data that you would like to claim as confidential business information (CBI), please follow the instructions in **Enclosures 2** and **5** to ensure the appropriate handling and submission of your response. You are required to return all **Enclosure 2** associated responses and documents within **120 days** after receipt of this request. Also note that our contractors and other authorized representatives discussed in **Enclosure 6** must follow the policies and procedures for handling trade secrets and CBI outlined in **Enclosure 5**, which ensures your rights and protects any privileged information you submit for this request.

Supplemental information is provided in the following enclosures:

Enclosure #	Description
1	Exemption Request for True Area Source, Non-Operational, or Non-Applicable Status
2	CAA Section 114 Survey for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills – Questionnaire and Instructions
3	EPA's Information Gathering Authority Under Section 114 of the Clean Air Act
4	Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and 114(c) of the Clean Air Act

---

<sup>1</sup> For additional information on emission data, please see 40 CFR 2.301.

Enclosure #	Description
5	Summary of Procedures for Safeguarding Clean Air Act Confidential Business Information
6	Designation of Authorized Representative for Standards of Performance for New Stationary Sources (Section 111) and National Emission Standards for Hazardous Air Pollutants (Section 112)

This CAA section 114 request for information is one step in an established public process for collecting foundational information as part of our NSPS and NESHAP reviews required by the CAA. The public and stakeholders will continue to have an opportunity to comment on the EPA's NESHAP subpart MM and NSPS subpart BB/BBa rules, including a formal notice-and-comment period on any proposed action. CAA section 114(a) authorizes the EPA Administrator to require the submission of information, including information from an owner or operator of an emission source for the purpose of developing or assisting in the development of NESHAP under CAA section 112. This authority has been delegated to the Director of the Sector Policies and Programs Division (SPPD) in the U.S. EPA Office of Air and Radiation (OAR), Office of Air Quality Planning and Standards (OAQPS).

Thank you for your assistance in this effort. Your response will provide comprehensive information about the pulp and paper source category, which will lead to a more effective rulemaking. If you have questions regarding this questionnaire, please contact Matt Kollman in the EPA's Sector Policies and Programs Division at (919) 541-1920 or [kollman.matthew@epa.gov](mailto:kollman.matthew@epa.gov).

Sincerely,

Penny Lassiter  
Director  
Sector Policies and Programs Division

cc: Rich Garber, Packaging Corporation of America  
Matt Kollman, EPA OAQPS  
Denisse Diaz, EPA Region 4  
John Mooney, EPA Region 5  
David Garcia, EPA Region 6  
Krishna Viswanathan, EPA Region 10  
Ron Gore, Alabama Dept. of Environmental Management  
Jim Boylan, Georgia Dept. of Natural Resources, Environmental Protection Division  
Bryan D. Johnston, Louisiana Dept. of Environmental Quality  
Annette Switzer, Michigan Dept. of Environmental Quality  
Frank Kohlasch, Minnesota Pollution Control Agency  
Lida Warden, Tennessee Dept. of Environment and Conservation  
Kathy Taylor, Washington State Dept. of Ecology

Gail Good, Wisconsin Dept. of Natural Resources