



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OCT 22 2012

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Michael Basore  
Plant Manager  
Innovia Films  
6000 SE 2<sup>nd</sup> Street  
Tecumseh, KS 66542-9609

Dear Mr. Basore:

This is in response to your August 26, 2012 letter, where you asked to use a sulfur dioxide (SO<sub>2</sub>) continuous emission monitoring system (CEMS) in place of hydrogen sulfide (H<sub>2</sub>S) and carbon disulfide (CS<sub>2</sub>) CEMS. These CEMS would be used to measure total sulfides at the inlet and outlet of control devices on the process vents at the Innovia Films facility in Tecumseh, KS. This facility is subject to 40 CFR Part 63, Subpart UUUU - National Emission Standards for Hazardous Air Pollutants from Cellulose Products Manufacturing. Under Subpart UUUU, you are allowed to demonstrate compliance of the process vent control device by measuring H<sub>2</sub>S and CS<sub>2</sub>. You desire to use a wet-basis SO<sub>2</sub> CEMS that dilutes and dries the sample before converting the sulfides to SO<sub>2</sub> for subsequent measurement. This SO<sub>2</sub> would be converted to CS<sub>2</sub> equivalents, which serves as the basis for the standard. You ask that this technique be approved, since it is an accepted practice for sulfides in similar regulated industries.

At your facility, you plan to monitor SO<sub>2</sub> on both the tall stack and the vent line to the flare. The CS<sub>2</sub> added to the CBX and the CS<sub>2</sub> recovered in recovery will be determined. From this, a mass balance will be calculated. The CS<sub>2</sub> lost from the system to the waste water treatment plant will be measured by difference. Your calculations for this mass balance and subsequent calculation for control efficiency appears workable.

From our review of your proposal, we find it should produce the results intended in the testing requirements. This technology of measuring reduced sulfur as SO<sub>2</sub> is allowed and has worked well in other regulated industries. We, therefore, approve your request to use an SO<sub>2</sub> CEMS in place of H<sub>2</sub>S and CS<sub>2</sub> CEMS to measure total sulfides at process vents. This alternative method approval is granted for Subpart UUUU of 40 CFR Part 63. Since this approval is applicable to other facilities wishing to use these options, we will be posting this letter on our web site at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have further questions in this matter, please contact Foston Curtis of my group at (919)541-1063.

Sincerely,

A handwritten signature in blue ink that reads "Connie Oldham".

Conniesue B. Oldham, Ph.D., Group Leader  
Measurement Technology Group

cc: Rick Bolfig, KDHE  
Foston Curtis, E143-02  
Scott Postma, Region 7