



August 16, 2021

Tony Hobson
Vice President, Manufacturing
New-Indy Catawba, LLC
PO Box 7
Catawba, SC 29704

Re: New-Indy Catawba Mill Corrective Action Plan dated July 12, 2021

Dear Mr. Hobson:

We have completed our review of the New-Indy Catawba Mill Corrective Action Plan Revision 2 Submitted: July 12, 2021 (CAP). The Department is generally concerned that the CAP does not clearly and succinctly set forth the activities being undertaken to correct the undesirable levels of air contaminants, how these activities will achieve results, and the timeframe when activities are expected to be completed.

Please develop a summary table for the CAP which captures all the items identified as corrective actions that New Indy is currently implementing and proposes to implement. The table must include the corrective action title, a brief summary of the action, the current status, and the date for anticipated completion. If you are unable to define exact timelines and deadlines for an action because its implementation is dependent on the completion of another identified corrective action and/or it requires long-term financial planning, you must summarize how and at what point a determination will be made as to the action's necessity and feasibility. The table must be conducive to adding additional or removing corrective actions to address new sources of odors that may be identified or other necessary updates during implementation of the CAP.

In addition to the overall goal of correcting undesirable levels of air contaminants, the table must clearly demonstrate the CAP activities will address the following specific issues:

- The long-term plan for pressing and removing the sludge from the primary clarifier;
- Reducing the non-wastewater loads to the primary clarifier; and
- Investigation of the proper handling method for the non-wastewater loads that will no longer be sent to the primary clarifier.

Additionally, please provide the following on or before September 1, 2021:

- Provide geotechnical studies addressing the capacity of lagoon 4 to take on the increased expedited addition of sludge, fiber, and solids from current operations onsite removing this material from the ASB.

- Provide a gas study to ensure that the increased expedited addition of sludge, fiber, and solids into lagoon 4 is not contributing to odors. If it is determined to be a contributor, please include in the above summary table.
- Provide a summary of the methanol and foul condensate stream process control data for the ASB since January 2021.
- Clarify the locations of ambient monitoring Stations 1 and 2 during the period 4/9/21 through 5/25/21. The description and mapped location for Station 2 is inconsistent and the coordinates for those two locations are unresolvable (greater than 60 minutes in reported latitude and longitude).

We look forward to your response by September 10, 2021.

Sincerely,



Renee G. Shealy, Chief
Bureau of Environmental Health Services
