

DHEC ORDER MAY 14th STATUS UPDATE

Paragraph of Order	Requirement	Agency Due Date	Status
1	New-Indy must provide public notice of activities that may increase odors.	5/17	New-Indy is building a website to provide updates to the public on the activities the mill is taking to address the odor concerns.
2	Update and submit to DHEC a Notification of Intent for returning the stripper to operation	5/17	A draft of the Notice of Intent has been prepared and is undergoing internal review in preparation for submittal by Monday's deadline. New-Indy is working to identify certified laboratories available to complete the Sulfur Liquid Method ASTM D 5504 that is an alternative to the NCASI method.
3	New-Indy is required to evaluate all potential sources of odors on-site with NCASI, with focus on how the conversion from bleached to brown paper impacts emissions.	6/1	New-Indy is engaged in discussions with NCASI to evaluate all potential sources of odors on-site with NCASI, with focus on how the conversion from bleached to brown paper impacts emissions.
4	New-Indy is required to develop a QAPP to monitor H2S onsite and offsite.	6/1	New-Indy is preparing the QAPP to monitor H2S.
5	New-Indy is required to develop a plan to test the stacks and vents to determine if emissions have increased.	6/1	New-Indy has initiated discussions with Weston Solutions and NCASI to develop the test plan. The project team is currently finalizing the scope of the testing requirements.
5	New-Indy must commence that test with DHEC personnel to observe.	6/15	New-Indy will provide the required notice and opportunity to observe the testing to DHEC personnel.
5	Test the stacks and vents to determine if emissions have increased.	6/30	As noted in #5, preparation of the test plan is underway.

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5	New-Indy must conduct a facility wide air dispersion analysis.	7/15	New-Indy is working with NCASI and consultants to completed the air dispersion modeling analysis.
6	Develop a corrective action plan for results of the evaluation of potential sources of H2S at the mill (order 3), which will become an “enforceable part of this Order” upon DHEC approval.	6/15	The corrective action plan will be drafted once the results of the analysis of the potential sources of odors has been completed.
7	Develop a CAP for the wastewater treatment plant.	6/15	The corrective action plan for the wastewater treatment plant will be drafted once the results of the analysis of the potential sources of odors has been completed. NCASI is currently investigating modeling of the H2S using their H2S modeling simulator. New-Indy needs to collect some additional sample parameters that are not measured at this time. Environmental Business Specialists LLC (EBS) performed diagnostic testing of the wastewater treatment plant and the ASB biological health on May 11, 2021. Flagellates and free-swimming ciliates observed in the ASB effluent. SCF initiated ASB solids removal activities and aerator repairs on May 12, 2021.
8	Submit a weekly report each Friday to Renee regarding implementation of this order.	5/14	New-Indy is submitting this first weekly report today and will continue to do so weekly.