



Mr. Brian Hug Deputy Program Manager Air Quality Planning Program Air & Radiation Management Administration Maryland Department of the Environment 1800 Washington Boulevard Baltimore, MD 21232

Dear Mr. Hug:

In the September 20, 2007 meeting, you discussed the requirements through the Clean Air Act of 1999 that all States would be required to submit State Implementation Plans (SIP) to address Regional Haze in Class 1 areas throughout the country. Maryland has participated in ongoing regional planning and Maryland's SIP will address potential SO₂, NOx, and PM emission sources in the State.

Maryland Department of the Environment (MDE) will address regional haze through the Best Available Retrofit Technology (BART) program finalized by EPA in June 2005. Major sources that were placed into operation in the years 1962 through 1977 with the potential to emit more than 250 tons per year of the above pollutants will have to be reviewed with respect to BART.

At the above referenced meeting, the impact of Regional Haze regulations upon NewPage was discussed. In that discussion, MDE stated that the facility would be subject to BART, and that the only emission source to be addressed was No. 25 Power Boiler. Through the work with MANE-VU, presumptive levels of control for industrial boilers have been established. These are 90% control for SO₂, NOx emissions between 0.1 to 0.4 lb/mmbtu, depending upon boiler and fuel type, and PM emissions between 0.02 to 0.07 lb/mmbtu.

The Luke Paper Company has reviewed these presumptive levels of control for the specific pollutants and is proposing the following. The Luke Paper Company will reduce emissions to the equivalent levels of 90% control of SO₂ emissions, reduce NOx emissions to the level of 0.4 lb/mmbtu, and control PM emissions level to 0.07 lb/mmbtu for No. 25 Power Boiler on a yearly basis. We understand that these emission reductions will be put in place within five years of EPA approval of Maryland's SIP.

If you have any questions regarding this proposal, please contact Kenneth Wendell at (301) 359-3311, Extension 3370.

Sincerely yours,

Gary M. Curtis Vice President, Luke Operations

GMC:plt

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