

BUCKEYE

ONE BUCKEYE DRIVE
PERRY, FLORIDA 32347
TEL 850.584.1121 FAX 850.584.1220

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APR 14 1999

BUREAU OF
AIR REGULATION

April 8, 1999

Mr. Christopher L. Kirts, P.E.
Northeast District Air Program Administrator
Florida Department of Environmental Protection
Suite B-200, 7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Subject: Construction of Condensate Collection System
Buckeye Florida, Limited Partnership
Facility ID Number 1230001

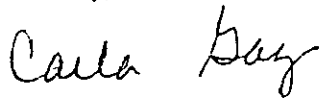
Dear Mr. Kirts,

The Buckeye Florida, Limited Partnership facility at Foley provides notice of its intention to proceed with the condensate collection project. The Maximum Achievable Control Technology (MACT) standards require the collection of regulated pulping condensates and biotreatment of these condensates in the wastewater treatment system as specified in 40 CFR 446(c)(3) and 446(e)(3). As these condensates are currently treated in the wastewater treatment system, the method of condensate treatment will not change. The only change is the conveyance via enclosed piping instead of open u-drains and sewer lines. Therefore, this project represents no increase in air emissions and no significant change in the wastewater treatment system.

The Foley mill is prepared to start construction of the condensate piping immediately. The project implementation will allow mill personnel to conduct modeling studies that we believe are necessary to assure compliance with the April 16, 2001 deadline.

Should you have any questions or disagree with our evaluation of the Department's permitting rules, please let me know immediately. You can contact me by phone (850) 584-1339 or email (carla_gay@bkitech.com).

Sincerely,



Carla Gay
Environmental Regulatory Support Manager

Copies: Mr. Jerry Owen, Florida DEP, NE District
Mr. Bruce Mitchell, Florida DEP Tallahassee

cc: S. Ariz, BAR
C. Phillips

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April 8, 1999

Mr. Christopher L. Kirts, P.E.
Northeast District Air Program Administrator
Florida Department of Environmental Protection
Suite B-200, 7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Subject: MACT Notification for Buckeye Florida, Limited Partnership
Facility ID Number 1230001

Dear Mr. Kirts,

The Buckeye Florida, Limited Partnership facility at Foley is subject to the Maximum Achievable Control Technology (MACT) requirements found in 40 CFR Part 63 Subpart S and adopted by reference in the Florida Administrative Code. In accordance with 40 CFR 63.455 (b), the Foley mill is submitting the initial notification report which includes the non-binding control strategy report (see Table 1) and the information specified in 40 CFR 63.9(b)(2) of Subpart A.

Subpart A Notification Requirements, Section 63.9(b)(2):

- (i) The name and address of the owner is Buckeye Florida, Limited Partnership
One Buckeye Drive
Perry, Florida 32347
- (ii) The address of the affected source is One Buckeye Drive (Highway 30)
Taylor County
Perry, Florida 32347
- (iii) The relevant standard is 40 CFR Subpart S with a compliance date of April 16, 2001
except for Section 63.440(d)(1), which has a compliance date
of April 17, 2006.
- (iv) The facility is a fully integrated dissolving and bleached papergrade kraft mill with a nominal capacity of 2532 tons per day of air-dried unbleached pulp. Major activities include areas such as wood handling facility, pulping systems, purification, chemical recovery, powerhouse, pulp drying/ converting/ warehouse, associated processes and equipment, and unregulated emissions units. Hazardous air pollutants are emitted from the purification systems, the pulping systems, the High Volume Low Concentration and Low Volume High Concentration non-condensable gas systems, the multiple evaporator systems, the pulping process condensates, and the turpentine recovery systems.
- (v) The facility is a major source.

Subpart S Notification Requirements, Section 63.445(b):

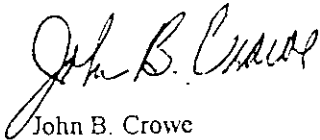
(1) A description of the emission controls or process modifications selected for compliance with the control requirements of the standard:

- Gas Collection and Combustion: HVLC, LVHC, pulp washing
- Wet Scrubbers: purification plants
- Collection via Hardpiping and Biotreatment: regulated condensates
- No treatment: knotters and screening located post-washing

(2) A compliance schedule or non-binding control strategy for systems subject to the April 16, 2001 is presented in the attached Table 1. Compliance with the standards for the HVLC system will be achieved by April 17, 2006.

To the best of my knowledge, this submittal meets the initial notification reporting requirements. If you have questions or need additional information, please contact Carla Gay at (850) 584-1339.

Sincerely,



John B. Crowe
Vice-President of Wood Cellulose Manufacturing

Attachment: Table 1, Control Strategy for MACT Compliance

Copies: Mr. Bruce Mitchell, Florida DEP, Tallahassee
Mr. Al Linero, Florida DEP, Tallahassee
Mr. David Buff, Golder and Associates
Mr. Terry Cole, Oertel, Hoffman, Fernandez, and Cole, P.A.

TABLE 1. MACT CONTROL STRATEGY REPORT FOR BUCKEYE FLORIDA

Regulation (see note)	Scope Description	Schedule						Emissions Impact	EU's Affected	EU Rate Impact	Comments
		Study Complete	Funding/ PO's	Const. Start	Const. Finish	Final Compliance	Compliance Tests				
63.443	Collection/combustion of HAP emissions from the Turpentine Decanter & Turpentine Underflow tank (enclosures, piping connection to existing NCG transport systems)	Dec-99	Apr-00	Jul-00	Jan-01	Mar-01	Jun-01	S02 <15tpy, HAPS Reduction	Digesting, Turpentine, #1 Bark Boiler	None	
63.443	Backup combustion of HAP emissions from the HVLC and LVIIC systems in existing #4 Recovery Boiler (piping and injection nozzles in boiler)	Dec-99	Apr-00	Jul-00	Jan-01	Mar-01	Jun-01	HAPS Reduction	#4 Recovery Boiler	None	
63.443	Collection/combustion of HAP emissions from #1 and #2 Mill Brownstock Knotter, Washing, Screening and Decker Systems (hoods and new gas transport system to boiler)	Dec-03	Jun-04	Jan-05	Jan-06	Mar-06	Jun-06	S02 <5tpy, HAPS Reduction	Brownstock Washers, Screening, #1 Bark Boiler, #4 Recovery Boiler	None	
63.445	Control of chlorinated HAPs from the #2 Mill Purification Plant with Wet Scrubber and installation of CMS as specified in 63.453(e)	Dec-99	Apr-00	Jul-00	Jan-01	Mar-01	Jun-01	HAPS Reduction	#2 Purification	None	
63.446	Collection and piping of condensates from Turpentine Decanter, Digesting Accumulator Tank, and #1, 2 & #4 Evaporators feed effects to Wastewater Treatment System for treatment (pumps and piping) and installation of CMS as specified in 63.453	Dec-98	Mar-99	Apr-99	Jan-00	Mar-01	Jun-01	HAPS Reduction	Digesting, Turpentine, #1,2,3,&4 Evaps	None	

Non- Applicable Regulations and Basis:

Regulation Basis

63.444 Not a Sulfite Mill

63.445 #1 Purification Plant produces dissolving kraft pulp. Bleaching system standards will be implemented as required after the promulgation of the Dissolving Kraft subcategory effluent guidelines.

63.447 Clean condensate alternative option will not be used

Note: Regulatory reference is to the particular section of part 63 and would include any internal references to other standards.

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BUREAU OF
AIR REGULATION

April 8, 1999

Mr. Lee Page
U.S. Environmental Protection Agency
Region IV
Atlanta Federal Center
100 Alabama Street
Atlanta, Georgia 30303

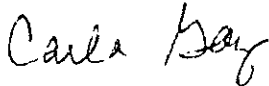
Subject: MACT Notification for Buckeye Florida, Limited Partnership
Foley Facility

Dear Mr. Page,

The Buckeye Florida, Limited Partnership facility at Foley, Florida is subject to the Maximum Achievable Control Technology (MACT) requirements found in 40 CFR Part 63 Subpart S and adopted by reference in the Florida Administrative Code. In accordance with 40 CFR 63.455 (b), the Foley mill has submitted the initial notification report to the Florida Department of Environmental Protection. A copy of the submittal is enclosed for your records. The initial notification report includes the non-binding control strategy report (see Table 1) and the information specified in 40 CFR 63.9(b)(2) of Subpart A.

If you have questions or need additional information, please contact Carla Gay at (850) 584-1339.

Sincerely,



Carla Gay
Environmental Regulatory Support Manager
Buckeye Technologies Inc.

Enclosure: Initial Notification Report

Copies w/o enclosure: Mr. Bruce Mitchell, Florida DEP, Tallahassee
Mr. Al Linero, Florida DEP, Tallahassee
Mr. Christopher Kirts, Florida DEP Jacksonville
David Buff, Golder and Associates
Mr. Terry Cole, Oertel, Hoffman, Fernandez, and Cole, P.A.

cc: J. Arif, BARR
C. Phillips, BARR