



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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**DIVISION OF AIR
RESOURCE MANAGEMENT**

4APT-ATMB

Mr. Michael Cooke
Director
Division of Air Resource Management
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Cooke:

We have received a June 28, 2005, letter from Ms. Rita Felton-Smith requesting a determination regarding the applicability of New Source Performance Standards (NSPS) Subpart BB - "Standards of Performance for Kraft Pulp Mills." The request relates to the proposed No. 2 Mill Brown Stock Washer (BSW) system at the Buckeye Florida Limited Partnership facility in Perry, Florida. The No. 2 Mill BSW system will be subject to Subpart BB, and Buckeye has requested an exemption from the Total Reduced Sulfur (TRS) standard. Subpart BB at §60.283(a)(1)(iv) allows owners and operators of brown stock washer systems to request an exemption from the TRS standard if it is technologically or economically infeasible to incinerate the exhaust gases. Any system which is exempt will, however, become subject to the provisions of Subpart BB if the facility is changed so that the gases can be incinerated. Based on our review, we have determined that an exemption from the TRS standard is appropriate for the No. 2 Mill BSW system due to the unreasonable cost of controlling emissions. The No. 2 Mill BSW system will be subject to the Subpart BB standard for TRS if future changes in the mill make the control of emissions cost effective.

The Environmental Protection Agency (EPA) Region 4 provided a determination on December 12, 2000, regarding a previous proposal to change the No. 2 Mill BSW system. The determination exempted the No. 2 Mill BSW system from the Subpart BB standard for TRS until April 16, 2006. That determination was based on the high cost of controlling TRS emissions and due to the fact that 40 CFR Part 63 Subpart S would require the collection and incineration of High Volume Low Concentration (HVLC) vent gases by no later than April 16, 2006. At the time of our previous determination, Buckeye intended to consolidate HVLC gas collection and incineration for the No. 1 Mill BSW and No. 2 Mill BSW into one integrated system. Since then, the company has indicated it will comply with Subpart S by using the Clean Condensate Alternative (40 CFR 63.447), in lieu of HVLC gas collection and incineration. Therefore, the collection and incineration of HVLC vent gases from the No. 1 Mill and No. 2 Mill BSW systems, as previously proposed by Buckeye, will no longer be required by 40 CFR Part 63 Subpart S.

The design of the proposed No. 2 BSW system has been revised since EPA Region 4's December 12, 2000, determination. The revised proposed change to the No. 2 Mill BSW system involves the replacement of the existing three-stage rotary drum washer system with a new vacuum washer with a totally enclosed hood, followed by a four-stage drum displacer washer. While changes are being contemplated for the No. 1 Mill BSW system, that project is described as being several years away from completion and is not expected to result in the No. 1 Mill BSW system being subject to Subpart BB. Buckeye is requesting an exemption from the Subpart BB TRS standard for the No. 2 Mill BSW system due to the cost of control.

Buckeye has provided information indicating an annualized cost of \$1,055,446 for a vent gas collection system for the No. 2 Mill BSW. The vent gas control would reduce TRS emissions by 14.8 tons per year at maximum capacity, as estimated from an emission factor based on information provided in National Council for Air and Stream Improvement Technical Bulletin No. 849, August 2002. This results in a control cost of \$71,314/ton. The cost estimate is based on the vent gas collection system being routed to existing mill combustion devices. The No. 1 bark boiler would be the primary combustion device, and the backup combustion device would be the No. 1 power boiler. Based on the control cost estimate provided, EPA Region 4 has determined that an exemption from the Subpart BB standard for TRS is justified for the No. 2 Mill BSW system. This determination is consistent with previous determinations which have been made regarding economic infeasibility of controlling TRS emissions from BSW systems. If any future changes at the mill make the control of TRS emissions from the No. 2 Mill BSW system cost effective, the exemption under §60.283(a)(1)(iv) will no longer apply, and it will be necessary for Buckeye to control TRS emissions.

If there are any questions regarding this letter, please contact Mr. Keith Goff of the EPA Region 4 staff at (404) 562-9137.

Sincerely,



Beverly H. Banister

Director

Air, Pesticides & Toxics
Management Division



2:20 PM

Florida Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 10/12/05

TO: Chris Kirts - and Rita Felton-Smith

PHONE: _____ FAX: sc # 880-4363

FROM: Vickie Gibson PHONE: sc # 291-9504

Division of Air Resources Management FAX: **850.922.6979**

RE: EPA Letter on Buckeye

CC: _____

Total number of pages including cover sheet: 3

Message

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

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