

BUCKEYE

ONE BUCKEYE DRIVE
PERRY, FLORIDA 32348-7702
TEL 850.584.1121 FAX 850.584.1220

May 15, 2002

Ms. Cindy Phillips, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
MS 5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Buckeye Florida, Limited Partnership
40 CFR Part 63 Subpart B Notification

Dear Ms. Phillips:

The Buckeye Florida, Limited Partnership (i.e. Buckeye) is a manufacturing facility located in Perry, Florida. The Buckeye facility produces purified dissolving kraft and papergrade pulp with major activities such as wood handling, pulping processes, purification, chemical recovery, power and steam generation, and pulp drying. Power and steam are supplied by the plant industrial boilers and associated turbine generators. The facility is currently subject to the MACT requirements in 40 CFR Part 63: Subparts A - General Provisions, Subpart B - Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections 112(g) and 112(j), Subpart S - NESHAPS from the Pulp and Paper Industry, and Subpart MM - NESHAPS for Chemical Recovery Combustion Sources at Kraft Mills. The Buckeye facility may be subject to the future Maximum Achievable Control Technology (MACT) standards for process heaters and boilers. As of the date of this letter, EPA has not promulgated a MACT standard affecting industrial boilers. Therefore, this Part 1 notification is submitted to satisfy the requirements of 40 CFR Part 63 Subpart B.

Based on the current air emissions inventory, the Buckeye facility is a major source of hazardous air pollutants source as defined in 40 CFR Part 63.2. Therefore, the facility is subject to the current MACT standards described above and is expected to be affected by the future MACT requirements for Industrial, Commercial, and Institutional Boilers and Indirect-fired Process Heaters which have not been proposed. This notice contains the information required for a Clean Air Act 112(j) part 1 MACT application to comply with the May 15, 2002 deadline.

With regard to the Clean Air Act, Section 112(j) matters, Buckeye is engaged in the manufacturing of dissolving kraft and papergrade wood cellulose pulp with steam and power provided by the facility boilers and associated turbine generators. This facility is located at One Buckeye Drive, Perry, Florida, Taylor County. It is possible that this source will be subject to the emission standards of Subpart DDDDD, the MACT rule for industrial, commercial, and institutional boilers and process heaters.

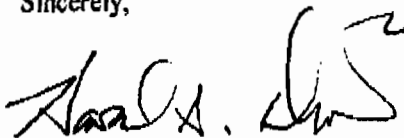
There are four industrial steam-generating boilers at the Buckeye facility: two power boilers and two bark boilers. The two power boilers are permitted to burn natural gas and No. 6 fuel oil. The power boilers may also use No. 2 fuel oil as a pilot fuel for startup, shutdown, or malfunction or to dry out the boiler after a maintenance wash. The No. 1 power boiler (EU# 002) and the No. 2 power boiler (EU# 003) are each rated at 249 million BTU per hour (MMBTU/hr). The two bark boilers are permitted to burn carbonaceous fuel (i.e. bark, chips, sawdust, and other wood fiber material) and No. 6 fuel oil. The bark boilers may also use natural gas or No. 2 fuel oil as a pilot fuel for startup, shutdown, or malfunction or to dry out the boiler after a maintenance wash. The No. 1 bark boiler (EU# 004) is rated at 300 MMBTU/hr. The No. 2 bark boiler (EU# 019) is rated at 601 MMBTU/hr. Each bark boiler is equipped with a venturi scrubber for air emissions control. All four boilers are vented through a common stack. The Low Volume High Concentration (LVHC) gases are burned in the No. 1 bark boiler with the No. 1 power boiler serving as a backup combustion unit.

The part 1 application must also contain information on any Clean Air Act 112(g) determinations and a certification by the responsible official. Regarding the Clean Air Act 112 (g) determination for a case-by-case MACT standard, this type of site-specific determination has not been required at the Buckeye plant. The required certification is included as follows:

I certify that I am a responsible official of the company, as defined in 40 CFR 63.2. Also, based upon information and belief I formed after reasonable inquiry, I certify that the statements and information provided above are true, accurate, and complete.

Please feel free to contact Ms. Carla Ferguson at (850) 584-1339, Mr. Ray Perry at (850) 584-1333, or me at (850) 584-1656 if there are any questions about this matter.

Sincerely,



Howard A. Drew
Vice-President
Wood Cellulose Manufacturing

HAD/clf

Copies: Mr. Christopher L. Kirts, P.E.
District Air Program Administrator
Northeast District
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-759

Mr. Douglas Neeley
US EPA, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

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RECEIVED

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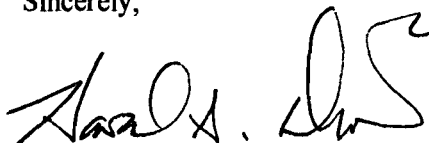
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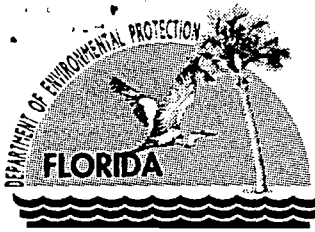


Howard A. Drew
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7825 Baymeadows Way, Suite B200
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61 Forsyth Street
Atlanta, Georgia 30303



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

May 16, 2002

Mr. Howard A. Drew
Vice President
Wood Cellulose Manufacturing
Buckeye Florida
One Buckeye Drive
Perry, Florida 32348

Re: 112(j) Notification Information Submittal

Dear Mr. Drew:

Thank you for submitting the referenced information in your letter received May 15, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter states that your notice contains information required for "a Clean Air Act 112(j) part 1 MACT application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

c: Ms. Carla Ferguson, Buckeye