



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-ARB

JUL 23 2001

Howard Drew
Vice President,
Wood Cellulose Manufacturing
Buckeye Florida, Limited Partnership
One Buckeye Drive
Perry, Florida 32348-7702

RECEIVED
JUL 27 2001

Dear Mr. Drew:

Your letter dated April 17, 2001, regarding an alternative monitoring request by the Buckeye Florida mill in Perry, Florida (Buckeye) has been forwarded to this office for approval by the Florida Department of Environmental Protection (FLDEP). Buckeye is requesting approval of an alternative monitoring parameter for the bleach plant scrubber, pursuant to the Pulp & Paper MACT standard, 40 CFR 63, Subpart S. More specifically, Buckeye is proposing to monitor the on/off operation of the bleach plant exhaust gas fan as an alternative to monitoring the gas scrubber vent gas inlet flow rate, as required in 63.453(c)(2).

Based on the discussion of the alternative monitoring parameter issue in the Environmental Protection Agency's (EPA's) Q&A Document for the Pulp & Paper MACT (Volume 1, Page 8 - 10), Region 4 concurs that adequate rationale for using an alternative parameter (as required in 63.453(n)), has been demonstrated. Therefore, Region 4 concurs with the Buckeye request to substitute vent gas fan on/off operation as an alternative monitoring parameter to 63.453(c)(2) and accordingly approves this specific request. Please note that as a condition for using fan data as an alternative parameter, the fan should be run at maximum speed during the performance test to demonstrate compliance. If you have any questions, please contact Mr. Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: Howard Rhodes, Division Director, FDEP
Rita Felton-Smith, FDEP