



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

APR 14 2003

4APT-ATMB

Howard A. Drew, Vice President
Buckeye Florida
One Buckeye Drive
Perry, Florida 32348-7702

Dear Mr. Drew:

This is in response to your letter dated October 31, 2002, to Mr. Christopher L. Kirts, Florida Department of Environmental Protection, Northeast District, requesting approval of alternative monitoring procedures for three smelt dissolving tank wet scrubbers, subject to the Pulp and Paper MACT, 40 CFR 63, Subpart MM. The continuous monitoring parameters for wet scrubbers, as defined in Section 63.864(a)(2), include pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15-minute period. However, Buckeye is requesting to monitor only the scrubbing liquid flow rate for the No. 2, No.3, and the No. 4 smelt dissolving tank wet scrubbers.

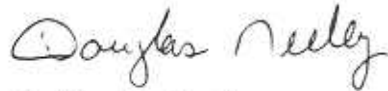
Justification for the alternative monitoring procedure is based on the "impingement type" of wet scrubbers used by Buckeye on its three smelt dissolving tanks. This particular design of scrubber introduces scrubbing liquid into the scrubber system via spray nozzles directly onto the scrubber fan and into the ductwork. Therefore, pressure-drop, the required monitoring parameter, is virtually non-existent and has no functional impact on scrubber performance.

The Environmental Protection Agency (EPA) has reviewed Buckeye's rationale for the alternative monitoring request and concurs that pressure-drop across the scrubber will provide little in assuring continuous compliance. However, we have received similar requests from various other mills, and in all such submittals the mills have requested the substitution of another monitoring parameter (usually fan data) in lieu of monitoring pressure drop. The combination of continuously monitoring the scrubbers liquid flow rate and fan data offers a more reasonable assurance of compliance than monitoring the liquid flow rate only. Therefore, the EPA will provide Buckeye with the same flexibility as provided other mills with similar requests, by approving fan data as an alternative monitoring parameter for the mills No. 2, No. 3, and No. 4 smelt dissolving tank wet scrubbers, in lieu of monitoring pressure drop. If Buckeye would rather monitor a parameter other than fan data, then a new alternative monitoring request should be submitted. If Buckeye accepts fan data as an alternative monitoring parameter, then the specific fan data to be monitored (e.g. amperage) should be identified and supplied to your Permitting Authority.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
2003 APR 22 P 1:56
NORTHEAST DISTRICT
JACKSONVILLE, FL

If further assistance is needed, please contact Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Neeley".

R. Douglas Neeley

Chief

Air Toxics and Monitoring Branch

Air, Pesticides and Toxics

Management Division

cc: Christopher L. Kirts, P.E., FDEP NE District
Rita Felton-Smith, FDEP NE District