



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 26, 2004

Mr. Howard Drew, Vice President
Wood Cellulose Manufacturing
Buckeye Florida, Inc.
One Buckeye Drive
Perry, Florida 32348-7702

RECEIVED
JUL 28 2004

Re: Alternative Opacity Monitoring Location on Lime Kiln

Dear Mr. Drew:

The Emissions Monitoring Section has reviewed the additional information that Buckeye submitted in support of its request for approval of an alternate monitoring location for the continuous opacity monitor on the lime kiln. The submitted material demonstrated the average opacity measured at the alternative location is equivalent to the opacity measured at the stack exit as described in Section 8.1(2)(iii) of Performance Specification 1. This was accomplished using EPA's Method 9 for comparison with the continuous opacity monitor reading.

Buckeye seeks approval pursuant to Section 8.1 of Performance Specification 1 to install and operate a continuous opacity monitor on its lime kiln due to EPA's promulgated NESHAPs for Kraft Chemical Recovery Combustion Sources (40 CFR Part 63 Subpart MM). The department approves the alternative location of the opacity monitor, which is located in the straight section of the duct immediately upstream of the stack, in the plane defined by the bend.

If you have any questions concerning the above, please contact Leigh-Ann Pell at 850/921-9510, or write to me.

Sincerely,

Leigh-Ann Pell
Emissions Monitoring Section
Bureau of Air Monitoring
and Mobile Sources

lp/

cc: Chris Kirts, Northeast District

"More Protection, Less Process"

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