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

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4APT-ATMB

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

Dear Mr. Drew:

Your request regarding an alternative test procedure by the Buckeye Foley mill has been forwarded to this office for approval by the Florida Department of Environmental Protection. Buckeye is requesting approval of an alternative sampling time when using Test Method 26A for the determination of total chlorinated HAPs as chlorine, pursuant to the Pulp & Paper MACT standard, 40 CFR 63, Subpart S. More specifically, Buckeye will test as required for at least one hour during each of the 3 runs and the neutral and acid titers of each run will be used to calculate the chlorine concentration. However, as an alternative to the requirement in 40 CFR 63.457(b)(5)(ii)(F)(4), for additional testing over longer sampling times if the neutral titer is less than 0.5 milliliter (ml), Buckeye will use the neutral titer even if it is less than 0.5 ml. If there is no color change, Buckeye will use 0.1 ml for both the neutral and acid titers and calculate the chlorine concentrations as "less than 0.8 ppm."

In support of its request, Buckeye states that the National Council for Air and Stream Improvement (NCASI), the research group that developed the titration procedure for Method 26A, conducted a study to demonstrate that a color change can be observed at a neutral titer of less than 0.5 ml and a valid test can be conducted, even if there is no color change, by using 0.1 ml for both the neutral and acid titers and calculating the chlorine concentration. If there is no color change, NCASI reports that the chlorine concentration should be reported as a "less than" measurement.

We have discussed this request with Mr. Gary McAlister of the Environmental Protection Agency's (EPA's) Emissions Monitoring and Analysis Division in the Office of Air Quality Planning and Standards, and concur that the requested alternative titration procedure for Method

26A is acceptable, and therefore, Region 4 approves this specific request. If you have any questions, please contact Mr. Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,

Douglas Neeley

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

cc: Carla L. Ferguson, Buckeye
Rita Felton-Smith, FDEP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

AUG 29 2001

Mr. Gary Lloyd
Technical Director
Roy F. Weston, Inc.
1625 Pumphrey Avenue
Auburn, AL 39832-4303

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Lloyd:

This is in response to your letter of July 31, 2001 describing the modifications that you would like to make to the procedures for measuring chlorine described in 40 CFR Part 63.457(b)(5)(ii)(A) through 63.457(b)(5)(ii)(K). These proposed changes are listed here:

1. To use a dry gas meter to measure the sample volume rather than use a calibrated orifice as required by the method.

2. To sample at a flow rate of 1000 mL/min to increase sample sensitivity rather than the rate of 200 - 250 mL/min required by the method.

3. To follow guidelines developed by the NCASI for dealing with low level samples rather than repeating any test that has a neutral titer of less than 0.5 mL as required by the method.

I have reviewed your proposed changes and the supporting information produced by the NCASI to support these changes. I have concluded that the changes you have proposed are minor changes that would not change the results of the method in a way that would affect the stringency of any emission limit. The guidelines developed by the NCASI are described in detail in the attached document from the NCASI.

Sincerely

Gary McAlister
Emission Measurement Center

Enclosure

cc: Steve Shedd (MD-13)