



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

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STATE OF FLORIDA  
DEPARTMENT OF ENV. PROTECTION  
NORTHEAST DISTRICT - JACKSONVILLE

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

**SUBJECT:** Buckeye's Request for an Alternative Test Method

**FROM:** Conniesue B. Oldham, Group Leader  
Measurement Technology Group

**TO:** R. Douglas Neeley, Chief  
Air Toxics & Monitoring Branch

I am writing in response to your April 7, 2006, memorandum requesting we evaluate the use of fan curves as an alternative to EPA Methods 1 and 2 (40 CFR 60, Appendix A) for the National Emission Standards for Hazardous Air Pollutants for the Pulp and Paper MACT standard for existing kraft pulp mills (40 CFR Part 63.443). We understand that the testing to be conducted is to demonstrate compliance with the Clean Condensate Alternative (CCA) as allowed by 40 CFR 63.447 at the Buckeye Pulp and Paper Mill, One Buckeye Drive, Perry, Florida 32348-7702.

Buckeye hired a contractor to conduct site-specific testing of methanol emissions from the High Volume Low Concentration (HVLC) sources at the Foley Mill. In all cases where it was physically possible (filtrate tanks, surge chests, foam tower vents, etc), EPA methods were used to determine volumetric flow rates. In the case of the hood vents from the No. 1 and No. 2 Brownstock Washers, fan curves were used to obtain worst-case estimates of volumetric flow rates.

The vents from the Brownstock Washers are horizontal and exit from the side of a building, making the use of stack extensions impractical. With the fans running continuously at the rated horse power and the absence of variable speed drives to alter the fan speed, fan curve estimates are worst-case scenarios. Fan curve estimates for volumetric flow rates reflect optimal performance of new equipment, and deterioration of performance due to equipment age would result in lower flow rates and lower emissions.

Based on information regarding reductions using the CCA approach, we agree that using fan curves to determine volumetric flow rates at the Brownstock Washers No. 1 and No. 2 are an

acceptable alternative to using EPA Methods 1 and 2 at the Buckeye facility located at One Buckeye Drive, Perry, Florida 32348-7702.

If you have additional questions, please call Michael Toney at (919) 541-5247.

cc: Christopher Kirts, Florida DEP  
Lee Page, EPA Region 4  
Mike Toney, EPA/MTG (E143-02)  
David C. Weeden, Buckeye Mill