



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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ATLANTA, GEORGIA 30303-8960

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

4APT-ATMB

David C. Weeden
Environmental Program Manager
Buckeye
One Buckeye Drive
Perry, Florida 32348-7702

Dear Mr. Weeden:

This is in response to your letter dated February 27, 2006, regarding Buckeye's intended use of the Clean Condensate Alternative (CCA) to comply with Phase 2 of the Pulp and Paper Maximum Achievable Control Technology (MACT) standard in 40 C.F.R. 63, Subpart S (i.e., to comply with certain process vent requirements by April 15, 2006). Buckeye is requesting approval of the following two aspects of its CCA proposal:

1. That the emissions reductions achieved as a result of the upgrades to Buckeye's No. 1 Lagoon are creditable for CCA.
2. That the use of fan curves to estimate volumetric flow rates through the fans at the Brownstock Washer hood vents is an acceptable alternative to EPA Reference Methods 1 and 2.

Regarding issue #1, the Environmental Protection Agency's (EPA) Pulp and Paper MACT guidance (EPA memorandum dated April 8, 2004, from Stephen Page, Director, Office of Air Quality Planning and Standards, to the EPA Regional Air Directors) states that hazardous air pollutant (HAP) reductions from efficiency improvements to a control device, such as adding aerators to a wastewater treatment pond, can be used as CCA credit under certain conditions. However, the emission changes have to be verifiable and clearly from additional improvements in technology. Also, if improvements to a control device (such as adding an additional aerator) are required elsewhere to meet effluent guidelines or Phase 1 of the MACT standard (i.e., Mill condensates and certain process vents), then the resulting reductions cannot be claimed.

For compliance with Phase 1 of the MACT (compliance date was April 15, 2001), Buckeye requested, and was granted by its permitting authority, the flexibility to demonstrate compliance with the condensate collection requirements in 40 C.F.R. 63.446(c) by collecting all named streams as required in 63.446(c)(1), or by using the mass collection option (pound per oven dried ton of pulp (lb/ODTP)) as required in 40

C.F.R. 63.446(c)(3). For condensate treatment, Buckeye was granted the flexibility to demonstrate compliance using the 92 percent (%) reduction option as required in 40 C.F.R. 63.446(e)(3), or by using the mass treatment lb/ODTP option as required in 40 C.F.R. 63.446(e)(5). However, in order to meet the 92% condensate treatment option, Buckeye had to make efficiency improvements to the wastewater treatment system, which was accomplished by moving eight of the sixteen aerators in Zone 2 and adding them to the existing seventeen aerators in Zone 1. This change in aerators increased the oxygen availability in Zone 1 and resulted in an increase in the methanol removal rate from 84% to greater than 92%. Since the Phase 1 MACT compliance date of April 15, 2001, Buckeye has used all of their compliance options for demonstrating compliance with the Phase 1 MACT requirements for condensate collection and treatment. However, now Buckeye says that they can show continuous Phase 1 MACT compliance for condensate treatment by using only the lb/ODTP option, and therefore the efficiency improvements made to the wastewater treatment system should be available credit for their CCA use.

Although the wastewater treatment system improvements were made specifically to meet the Phase 1 MACT compliance requirements and would therefore normally prevent any emission reductions from being used as credits for CCA purposes, we believe that the credits could be allowed in this scenario, provided Buckeye can provide the necessary data to satisfactorily demonstrate continuous compliance with the lb/ODTP compliance option for condensate collection and treatment, beginning at the initial compliance date. The documentation should include the amount of HAP mass required in 63.446(c) and (e), plus any amount of HAP mass that is used as a compliance cushion, and/or any amount of HAP mass that was used to demonstrate the need for a longer averaging time. The HAP mass documentation should include sample calculations and a detailed discussion of the calculation methodology, which should address the assumptions made and the source of the data used in the calculations. Finally, the documentation should include a list of modeling input parameters and data that was used prior to the improvements being made, a list of modeling input parameters and data that were used after the improvements were implemented, and a discussion of the variation of the input parameters and data used in modeling to demonstrate the increase of the wastewater treatment system methanol removal rate.

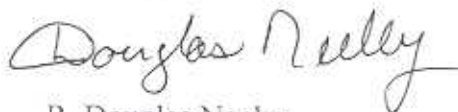
Buckeye must also be able to demonstrate that the wastewater treatment system improvements were not used to over control for the purpose of a compliance cushion for meeting the condensate collection requirements, or used as an operating cushion to gain flexibility in establishing the need for longer treatment standard averaging times or reduced monitoring, reporting, or recordkeeping. All of the information needed to document continuous compliance with the lb/ODTP compliance option for condensate collection and treatment should be supplied, if not already submitted, to your permitting authority for approval, and a copy of the information sent to this office.

Regarding Issue #2, the use of fan curves in-lieu-of EPA test methods for estimating volumetric flow rates through the fans at the washer hood vents is considered a major change to a test method, as described in 63.90. A major change to a test method

is a non-delegable authority to State and local agencies and must be approved or disapproved at the EPA Headquarters Office of Air Quality Planning and Standards. Your request for using fan curves has been forwarded accordingly.

EPA Region 4 coordinated this response with EPA Headquarters. If you have any further questions, please contact Lee Page of the Region 4 staff at (404)562-9131.

Sincerely,

A handwritten signature in black ink that reads "Douglas Neeley". The signature is written in a cursive, flowing style.

R. Douglas Neeley
Acting Director
Air, Pesticides & Toxics
Management Division

cc: Chris Kirts, FDEP