FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic mail – Received Receipt Requested

Buckeye Florida, Limited Partnership
One Buckeye Drive
Perry, Florida 32348

Re: Continuous Oxygen Monitoring System
Facility No. 1230001
Emission Units: 006, 007, 011, 024
ASP: 13-BB-AP

Dear Mr. Drew:

The Office of Permitting and Compliance received Buckeye Florida's request seeking an alternative monitoring procedure approval for the oxygen span requirement of 62-296.404(5)(b)1.g.(iii). The approval would authorize the use of the 25 percent oxygen span requirement of 40 CFR 60.284(a)(2)(ii). Buckeye wishes to deviate from the testing or monitoring requirements set forth in specific permit conditions through a request for an alternative sampling procedure (ASP) per Chapter 62-297.620 F.A.C.

The Total Reduced Sulfur/Oxygen (TRS/O_2) Continuous Emissions Monitoring System (CEMS) for emission units 006(#2 Recovery Boiler), 007(#3 Recovery Boiler), 011(#4Recovery Boiler), and 024(#4 Lime Kiln) were designed and manufactured to meet NSPS Subpart BB requirements which sets the span of the oxygen monitor at 25 percent. Buckeye's Title V Operation Permit 1230001-044-AV contains permit conditions for each emissions unit based on Chapter 62-296.404(5)(b)1.g.(iii):

(b) Continuous determination of total reduced sulfur emissions.
1. A total reduced sulfur continuous emissions monitoring system shall be installed, calibrated, certified and 22 operated pursuant to all of the following provisions:
g. The continuous emissions monitoring system shall have a maximum span value not to exceed:
(i) A total reduced sulfur concentration of 30 ppm for the total reduced sulfur continuous emissions monitoring system on any new design direct-fired kraft recovery furnace that is not direct-fired, new design suspension-burning kraft recovery furnace, incinerator, digester system or multiple effect evaporator system.
(ii) A total reduced sulfur concentration of 50 ppm for the total reduced sulfur continuous emissions monitoring system on any old design kraft recovery furnace, new design kraft recovery furnace that is not direct-fired, new design direct-fired suspension-burning kraft recovery furnace, cross recovery furnace, lime kiln or calciner.
(iii) 20 percent oxygen for the continuous oxygen monitoring system.

In the case of the No. 4 Lime Kiln, Chapter 62-296.404(5)(b)1.g.(iii) requirements conflict with Subpart BB. 40 CFR 60.284(a)(2)(ii) states:

(a) Any owner or operator subject to the provisions of this subpart shall install, calibrate, maintain, and operate the following continuous monitoring systems:
(1) A continuous monitoring system to monitor and record the opacity of the gases discharged into the atmosphere from any recovery furnace. The span of this system shall be set at 70 percent opacity.
(2) Continuous monitoring systems to monitor and record the concentration of TRS emissions on a dry basis and the percent of oxygen by volume on a dry basis in the gases discharged into the atmosphere from any lime kiln, recovery furnace, digester system, brown stock washer system, multiple-effect evaporator system, or

condensate stripper system, except where the provisions of §60.283(a)(1) (iii) or (iv) apply. These systems shall be located downstream of the control device(s) and the spans of these continuous monitoring system(s) shall be set:

(i) At a TRS concentration of 30 ppm for the TRS continuous monitoring system, except that for any cross recovery furnace the span shall be set at 50 ppm.

(ii) At 25 percent oxygen for the continuous oxygen monitoring system.

The 20 percent oxygen span requirement based on Chapter 62-296 is inconsistent with the department approved Emission Units 006 and 007 CEMS Operation Plan for the carbon monoxide/nitrogen oxide CEMS that share a common continuous oxygen monitoring system with the TRS CEMS.

The petitioner wishes to alleviate conflicting oxygen span values by using 40 CFR 60.284(a)(2)(ii) Subpart BB span value of 25 percent for Emission Units 006, 007, 011, and 024. The requested alternative monitoring procedure (25% span O_2) will be used in lieu of the department approved CEMS Operation Plan and will supersede the requirements of Chapter 62-296.404(5)(b)1.g.(iii).

The department has reasonable assurance an increase of the oxygen span will not negatively impact the quality of monitoring data, but merly eliminate multiple oxygen monitors and/or eliminate plant record keeping and reporting redundancies. The department will grant the use of the 25 percent oxygen span requirement of 40 CFR 60.284(a)(2)(ii) for Buckeye's oxygen CEMS for Emission Units 006, 007, 011, and 024. Furthermore, the affected specific conditions of 1230001-004-AV: D.19.g.(iii); E.19.g.(iii); F.16.g.(iii); and K.27.b.(ii) may be changed to reflect the alternative monitoring approval.

Please call Leigh-Ann Pell at 850/717-9033 if you have any questions regarding this determination.

The Department's proposed agency action shall become final unless a petition for an administrative hearing is timely under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition set forth below. On the filing of a timely petition, this action will not be final and effective until further order of the Department or the petition has been dismissed or withdrawn. Because the administrative hearing process is designed to formulate final agency action, the hearing process may result in a modification of the agency action or even reversal of the agency action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline.

The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's

proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Once this decision becomes final, any party to this order has the right to seek judicial review by the filing of a Notice of Appeal pursuant to Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida, 32399-3000, Agency.Clerk@dep.state.fl.us; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this action is filed with the Agency Clerk.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

Syed Arif

Digitally signed by Syed Arif
Date: 2013.12.06 12:22:45 -05'00'

Syed Arif, Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this letter of authorization for an alternate sampling procedure was sent by electronic mail with received receipt requested before the close of business on the date indicated below to the following persons.

Howard Drew, Buckeye Florida, Limited Partnership: howard_drew@bkitech.com
Michael Perry, Air Systems Coordinator, Buckeye Florida LP: Michael.Perry3@gapac.com
Richard Rachal, FLDEP NED: Richard.Rachal@dep.state.fl.us
Rita Felton-Smith, FLDEP NED: Rita.Fleton-Smith@dep.state.fl.us
David McNeal, EPA Region 4: mcneal.dave@epa.gov
Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce
2013.12.06 13:03:17 -05'00'